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glg Global Legal Group

Introductory Chapter

1

A Tale of Two Worlds

Quirino Mancini, International Masters of Gaming Law

Q&A Chapters

3

Argentina

Tomás Enrique García Botta & Agustín Díaz Funes,
MF Estudio — Abogados

9

Australia

Julian Hoskins, Daniel Lovecek, Bree Ryan &
Alexander Norrish, SENET

19

Austria

Thomas Talos & Nicholas Aquilina, BRANDL TALOS

26

Belgium

Pieter Paepe & Lucas Falco, EDSON Legal

33

Brazil

Luiz Felipe Maia & Flavio Augusto Picchi,
Maia Yoshiyasu Advogados

40

Czech Republic

Robert Skalina, WH Partners

49

Denmark

Nina Henningsen, Mazanti-Andersen

57

Estonia

Karolina Ullman, Triin Kaurson, Henrik Link &
Linell Raud, NJORD Law Firm

62

Finland

Minna Ripatti & Antti Koivula,
Legal Gaming Attorneys at Law

67

France

Alexandre Rudoni & Emmanuelle Sarlangue,
Allen Overy Shearman Sterling LLP

72

Germany

Dr. Joerg Hofmann, Dr. Matthias Spitz &
Michelle Hembury, Melchers Law Firm

80

Greece

Maria Tranoudi & Dimitris Emvalomenos,
Bahas, Gramatidis & Partners LLP

86

Hong Kong

Vincent Law, Raymond Chan & Johnson Ng,
Mayer Brown

92

Hungary

Viktor Radics, Dániel Élő & András Nemescsói,
DLA Piper Hungary

99

India

Ranjana Adhikari, Sarthak Doshi &
Shashi Shekhar Misra, IndusLaw

114

Ireland

Barry Fagan, Natalie Quinlivan & Ciara McGuinness,
Fieldfisher Ireland LLP

120

Isle of Man

Claire Milne & Sophia Howell Evans,
Appleby (Isle of Man) LLC

127

Israel

Jacob (Koby) Sarov & Ido Nahon, Firon Law Firm

132

Japan

Masayuki Fukuda, Nagashima Ohno & Tsunematsu

139

Macau

Pedro Cortés, Lektou

147

Malta

Reuben Portanier & Dr. Terence Cassar, GTG

153

Mexico

Carlos Portilla Robertson & Ricardo Valdivia González,
Portilla, Ruy-Díaz y Aguilar, S.C.

159

Netherlands

Dr. Alan Littler & Joris Crone, Kalff Katz & Franssen

166

Nigeria

Chiamaka Ogbonnaya-Osibie, Deborah Dada &
Chinaza Eneh, The Trusted Advisors

172

Norway

Alexander Mollan & Brede A. Haglund,
Brækhus Advokatfirma

177

Poland

Ewa Lejman, WH Partners

185

Portugal

Alexandra Courela & Ricardo Henriques,
Abreu Advogados

191

Romania

Mihai Fifoiu, Lucian Barbu & Laurentiu Neacsu,
Nestor Nestor Diculescu Kingston Petersen (NNDKP)

202

South Africa

Garron Whitesman, Whitesmans

209

Spain

Patricia Lalanda Ordóñez, Fernando A. Martín Martín &
Cristina Romero de Alba, LOYRA Abogados

Q&A Chapters Continued

216

Sweden

Maria McDonald, Elvin Sababi &
Karl-Oskar Hokkanen, Nordic Gambling

224

Switzerland

Dr. Andreas Glarner & Stefan Keller,
MME Legal | Tax | Compliance

230

United Kingdom

Chris Elliott & Rawa Kaftan, Wiggin LLP

236

USA – Illinois

Paul T. Jenson, Erin Lynch Cordier, Anne Kremer &
Alexandra Van Dusen, Taft Stettinius & Hollister LLP

244

USA – Mississippi

Scott E. Address, Balch & Bingham LLP

250

USA – Nevada

Karl F. Rutledge & Glenn J. Light, Lewis Roca

256

USA – New Jersey

Jeremy Kleiman & Ariana LoGiudice, Saiber LLC

262

USA – Virginia

Jason C. Hicks & Ian Dickinson,
Womble Bond Dickinson



Greece



Maria Tranoudi



Dimitris Emvalomenos

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1 Relevant Authorities and Legislation

1.1 Which entities regulate what type of gambling and social/skill gaming activity in your jurisdiction?

Relevant Product		Who regulates it in online form?	Who regulates it in land-based form?
Gaming	Casino gaming (including slots and casino table games such as roulette & blackjack)	The Hellenic Gaming Commission (“HGC”).	
	Poker		
	Bingo		
Betting	Betting	The HGC.	
	Sports/horse race betting (if regulated separately to other forms of betting)		
	Fantasy betting (payment to back a ‘league’ or ‘portfolio’ selection over a period of time, for example in relation to sport)		
Lotteries	Lotteries	The HGC.	
Social/Skill arrangements	“Social” gaming with no prize in money or money’s worth	The HGC. ¹	
	Skill games and competitions with no element of chance		

1.2 Specify: (i) the law and regulation that applies to the Relevant Products in your jurisdiction; and (ii) – in broad terms – whether it permits or prohibits the offer of Relevant Products to persons located in your jurisdiction.

The law governing and authorising the offer of the Relevant Products in Greece is principally Law 4002/2011 “Regulating the Gaming Market” (“Law”) as well as Law 2206/1994 and Law 4512/2018 on casinos. In addition, several decisions and regulations issued by the Minister of Finance or the HGC supplement the Greek legal gaming regime with respect to the Relevant Products – some of which are listed below.

Ministerial Decisions

- T/6736/2003 – “Regulation on Administrative Control and Supervision of the Operation of Casinos”.
- 79835 EE 2020/2020 – “Enactment of Gaming Regulation on Organizing and Conducting Online Games of Chance”.²
- 79314 EE 2020/2020 – “Enactment of Gaming Regulation on Conducting Games of Chance via Video Lottery Terminal (VLT)”.
- 132934 EE 2022/2022 – “Enactment of Gaming Regulation – General Regulation for the Organization and Conduct of State Lotteries”.
- 79292 EE 2020/2020 – “Enactment of Gaming Regulation on Commercial Communication Regarding Games of Chance”.
- 79305/27.7.2020 – “Enactment of Gaming Regulation on Suitability of Persons”.

HGC Decisions

- 509/1/11.09.2020/2020 – “Regulating the Issuance of Suitability Permit for Affiliates of Online Gaming Promotion Activities and Registration in the Register of Affiliates”.
- 331/3/07.06.2018 – “Regulating the Conduct and Control of Games of Chance Conducted Through VLT-type Gaming Machines”.
- 253/3/30.03.2017 – “Regulating the Conduct and Control of Electronic Technical Amusement Games With Gaming Machines”.

2 Application for a Licence and Licence Restrictions

2.1 What regulatory licences, permits, authorisations or other official approvals (collectively, "Licences") are required for the lawful offer of the Relevant Products to persons located in your jurisdiction?

The Law regulates electronic amusement skill games³ and games of chance⁴ that are conducted by means of gaming machines or via the internet; consequently, the offer of the Relevant Products whether land-based or online requires prior licensing.

No licence is required for the offer of the rest of the amusement skill games, provided that all legal conditions are met.

The operation of video lottery terminals ("VLTs") has been exclusively granted to OPAP, a leading Greek gaming company, for a maximum of 25,000 VLTs.

2.2 Where Licences are available, please outline the structure of the relevant licensing regime.

In relation to electronic amusement skill games played on gaming machines, they are permitted only to operators holding the necessary operating licence and only for certified games installed on certified gaming machines operating in certified venues.

For the lawful offer of games of chance⁵ via the internet or by means of gaming machines (land-based), the prior issuance of an administrative licence is required in accordance with the Law⁶.

In relation to the conduct of games of chance via the internet, two types of licences are provided by the Law: a licence for conducting online betting; and a licence for other online games including casino and poker.

Licences also exist in relation to affiliates⁷ cooperating with the licence holder (B2B) of the Relevant Products.

In relation to casinos, there are two types of licences: a simple casino licence; and a licence to operate a "wide-range" casino.

Casinos of the simple type may have gaming rooms (and ancillary facilities) and accommodation of at least four stars or three keys classification, in accordance with the provisions of Law 4276/2014, as well as shops, catering, leisure, entertainment or other activities related to the leisure industry.

Casinos with a wide range of activities may have gaming rooms and ancillary facilities, combined with hotel accommodation of at least five stars, shops, catering facilities, recreation, entertainment or other activities related to the leisure industry and at least one special tourism infrastructure facility (such as a conference centre, golf course, thalassotherapy centre, tourist port, ski resort, theme park, sports tourism training centre, hydrotherapy centre, water park, sports tourism centre or other leisure facility).

2.3 What is the process of applying for a Licence for a Relevant Product?

Generally, all licence applicants must submit their application and supporting evidence to the HGC.

For the online gaming licence, applicants must submit to the HGC an application including the type of licence they wish to obtain and the type of online gaming they intend to conduct. The application must be accompanied by the supporting documents referred to in Article 46 of the Law and a fee of €10,000 for participation in the procedure. Each candidate may be granted both types of licences, which are personal and may not be transferred or assigned in any way, in whole or in part.

An online gaming licence is granted by a decision of the HGC, which is issued within two months from the submission to it of an application, in accordance with the procedure set forth in the Law. Failure of the HGC to issue a decision within the abovementioned deadline shall constitute an implicit rejection of the application.

2.4 Are any restrictions placed upon licensees in your jurisdiction?

The Law places several restrictions upon licensees in Greece, such as:

- The conduct of games of chance via gaming machines must be carried out exclusively through terminals connected via a network to central computer systems, as well as systems and subsystems, connected to the computerised monitoring and control system ("CMCS"), to which the HGC has access. Online games of chance must be conducted exclusively through systems and subsystems connected to the CMCS. The licence holder must retain the data received from the systems and subsystems of the games of chance it conducts for at least 10 years on secure media that allow the accurate reproduction of all stored monitoring and control data.
- Betting of any type in financial instruments traded in an organised market operating in Greece is prohibited.
- It is prohibited to operate a bookmaker.
- The conduct, within Greece, of games of chance via other audiovisual and electromagnetic media is permitted only after the issue of a special licence granted by the HGC.
- Licence holders are prohibited from allowing natural persons under 21 years old and non-registered players to participate in the games of chance offered via their websites. Before the creation of a player's account for participation in any online game of chance, the player must agree to the terms of the game contract.
- All payments of participation amounts and payouts from participation in online gaming must be performed through credit institutions or payment institutions established and lawfully operating in Greece or in any other Member State of the European Union or the Economic European Area.
- Licence holders are subject to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation ("GDPR")), Law 4624/2019 (implementation measures of the GDPR) and Law 2472/1997 (on personal data). Thus, licence holders must take appropriate precautionary measures to ensure that players cannot be identified by technical or other means that can reasonably be used by third parties.
- The gaming machines that minors are allowed to use shall be installed in discrete areas and supervised by an operations manager.
- Licence holders, gaming operators, stores' operations managers and employees, as well as persons who permanently or provisionally exercise supervision in venues where gaming machines are in operation, are obliged to deny entry into and stay in the stores/venues of persons under the age of 21 and self-excluded persons. They must also post signs of prohibition of entrance regarding such persons, both inside and outside the stores/venues.
- Before a player can participate in games of chance conducted through gaming machines or online, licence holders must issue to the player an individual player's card in accordance with the process and terms specified by the HGC.

2.5 Please give a summary of the following features of any Licences: (i) duration; (ii) vulnerability to review, suspension or revocation.

Online games of chance licences have a seven-year term from their award and include the specific terms governing the games of chance for which they are issued. At least one year prior to expiry of a valid licence, the licence holder may, following an application to the HGC, request its extension for an equal period.

The term of validity of the licence to operate a simple casino business is 15 years and for a “wide-range” casino, 30 years.

The HGC has the power and authority to issue, suspend and revoke licences and certifications, and to supervise and control the conduct and operation of games of chance.

2.6 By Relevant Product, what are the key limits on providing services to customers? Please include in this answer any material promotion and advertising restrictions.

As per Article 32 of the Law:

- Only natural persons who are 21 years old or older are permitted to participate in games of chance, which must be previously validated by the CMCS through any appropriate electronic or other means.
- The minimum amount of participation in games of chance via gaming machines must be €0.10 and the maximum must be €2. The conduct of games of chance via gaming machines shall be carried out only by the insertion of coins or banknotes, by reinvestment of winning units or by the use of a prepaid card, in such a way as to ensure the identification of the player.
- Conducting games of chance of any kind on credit and providing a discount on the cost of participation are both prohibited.
- It is prohibited to conduct games of chance where in any given participation, a player can lose an amount higher than their participation amount in that game.

Gaming-related commercial communication is also subject to restrictions. In any commercial communication, there must be a mandatory reference to persons prohibited from playing games of chance, as well as references to helplines and services for offering support to treat gaming addiction.

Furthermore, it is prohibited to include in a commercial communication the offer of credit to players for participating in games of chance.

The content of any type of commercial communication must be consistent with the principles set out in the Regulation of Games of Chance and the Regulation on Commercial Communication Regarding Games of Chance of the HGC.

2.7 What are the tax and other compulsory levies?

Tax obligations are imposed on both the game operators and the players.

Profit generated from operation of the games regulated by the Law are taxed according to the general income tax provisions.

For all games of chance, 35% of the gross profit regarding amounts generated from the licence holder's activity is due to the Greek State. For horse racing betting, 30% of the gross profit generated is due to the Greek State.

Players' winnings are also subject to tax on a progressive scale.

For winnings from online games of chance:

- 0% tax for a player's net profit of up to €100;
- 15% tax for a player's net profit of €100.01–€500; and
- 20% tax for a player's net profit of €500.01 or more.

For winnings from betting (per betting slip):

- 0% tax for a player's net profit of up to €100;
- 2.5% tax for a player's net profit of €100.01–€200;
- 5% tax for a player's net profit of €200.01–€500; and
- 7.5 % tax for a player's net profit of €500.01 or more.

2.8 What are the broad social responsibility requirements?

The Law as well as the HGC's Decision 163/5/09.07.2015 on “Principles of Responsible Gaming” place particular emphasis on responsible gaming by ensuring that all activities in the gaming sector are conducted in a socially responsible manner, in order to minimise the negative consequences that may result from inappropriate participation in gaming. The general requirements are as follows:

- The prohibition of gambling to minors and self-excluded players.
- The provision of game guides for each certified game of chance, responsible gaming information sheets and self-exclusion procedure forms.
- The operation of a telephone helpline for responsible gaming, player support and vulnerable persons.

2.9 How do any AML, financial services regulations or payment restrictions restrict or impact on entities supplying gambling? Does your jurisdiction permit virtual currencies to be used for gambling and are they separately regulated?

Pursuant to Law 4557/2018 (on AML), entities supplying gambling services are obliged to apply customer due diligence measures upon the collection of winnings, the wagering of a stake, or both, when carrying out transactions amounting to €2,000 or more, whether the transaction is carried out in a single operation or in several operations that appear to be linked.

Also, through Decision 554/5/21.04.2021, the HGC obliges entities supplying gambling services to, among other things, appoint a compliance officer who is responsible for taking every measure needed to prevent money laundering activity and to report such activity to the competent authorities.

Furthermore, according to the Law:

- Profits from games of chance played online must be deposited in an account kept by the player at a credit institution or payment institution, established and lawfully operating in Greece or in any other Member State of the European Union or the European Economic Area.
- The payment of the price for participation in an online game of chance must be made exclusively to a licence holder, without the intervention of any third party, except credit institutions or payment institutions established and lawfully operating in Greece or in any other Member State of the European Union or the Economic European Area, in a manner that ensures the players' identification.

Virtual currencies cannot be used for gambling.

3 Online Gambling

3.1 How does local law/regulation affect the provision of the Relevant Products online, both from: (i) operators located inside your jurisdiction; and (ii) operators located outside your jurisdiction?

The provision of the Relevant Products is permitted only to legal entities that have their registered office or permanent establishment in Greece or in another Member State of the European Union or the European Economic Area and a paid-up capital of at least €200,000. The members of the Board of Directors, the partners and the persons exercising the administration and management of the legal person applying for the licence must not have been convicted by final judgment of a felony or sentenced to any penalty for theft, embezzlement, fraud, dishonesty, receiving and disposing of the proceeds of crime, extortion, forgery, active or passive bribery, dangerous or grievous bodily harm, concealment of a crime, coin crime, common dangerous crime, crime against personal liberty, crime against sexual freedom, crime of economic exploitation of sexual life, or a crime provided for by the legislation on drugs, weapons, explosives and tax evasion.

The provision of online games of chance can only be implemented through websites that carry a domain name with the suffix “.gr”. Each website may exclusively host up to one licence of each type.

Candidate licence holders that have their registered seat outside Greece are required to physically install a safe server (security server) in Greece that is linked to the HGC, in accordance with the provisions of the Law.

3.2 What other restrictions have an impact on Relevant Products supplied online?

Credit institutions or payment institutions established and lawfully operating in Greece are prohibited from making payments of participation amounts and of payouts from online games of chance into accounts kept by illegal online gaming providers specified in the relevant blacklist kept by the HGC.

4 Enforcement Powers/Sanctions

4.1 Who is liable under local law/regulation?

The operator/provider, supplier, importer, affiliate and the player(s).

4.2 What form does enforcement action take in your jurisdiction?

Administrative fines and criminal sanctions.

4.3 What appetite for and track record of enforcement does your local regulatory authority have? Have fines, licence revocations or other sanctions been enforced in your jurisdiction?

The HGC's appetite for enforcement has gotten stronger over the years. This is evident from the latest blacklist issued on 26.07.2024 that lists all of the non-licensed gaming providers (land-based and online). In this 41st edition of the blacklist,

and within three months from the previous edition, 758 new illegal providers were added to the approximately 8,000 already on the list.

The HGC's appetite for enforcement can also be seen in the very recent (09.08.2024) revocation of the licences (online betting and other online games of chance) of a company providing online games of chance.

5 Anticipated Reforms

5.1 What (if any) intended changes to the gambling law/regulations are being discussed currently?

Currently, the HGC is considering changes to the way in which players' online account balances are being held. Players' account balances are currently being held in company accounts, but it is now being considered that separate accounts should be set up to hold players' account balances.

Endnotes

- 1 Arrangements whose outcome depends on luck or on technical and intellectual ability, but without the participants having any direct or indirect pecuniary burden, regardless of whether they are likely to obtain a pecuniary benefit from their participation, are not considered games of chance under Greek law, and are thus not regulated.
- 2 According to the Law, online games of chance comprise online betting as well as casino, poker and its variants provided online and conducted either live or using a random number generator.
- 3 Amusement skill games according to the Law are games whose outcome depends exclusively or mainly on the technical or intellectual skills of the player, and which are conducted at a public place, solely for amusement purposes. It is prohibited for the outcome of such games to be considered a wager placed between any persons or to provide the player with any form of financial gain. Amusement skill games are not permitted to have a system to calculate, record and pay out financial gains to a player. Depending on the manner in which they are conducted, amusement skill games are divided into three types: (i) mechanical games – games requiring only mechanical means, as well the contribution of the player's muscle power; (ii) electromechanical games – games requiring electrically or electronically assisted mechanisms; and (iii) electronic games – games that, apart from electronically assisted and other mechanisms, also require other hardware as well as gaming software, integrated or installed therein, containing all information, instructions and other data concerning the use and conduct of the game.
- 4 For a game to be characterised as a game of chance, the following conditions must apply cumulatively: (i) chance must be one of the factors influencing, even partially, the outcome of the game; and (ii) there must be a financial wager, defined as the player's option to assume the risk of investing any sum of money or other assets, irrespective of the value of said asset, in the outcome of the game, in order to seek a direct or indirect financial gain from the outcome of the game. The concept of a financial wager shall also include participation in games of chance offered for free (bonus, free bets, etc.) and is linked to the financial wager of a sum of money or other asset that has preceded and/or follows.
- 5 The Law regulates only games of chance such as betting, casino, lotteries, poker and its variants; all other games of chance are prohibited.

- 6 Mechanical and electromechanical games do not require licensing.
- 7 All entities cooperating with a licence holder for promoting the conduct of games and attracting clients to the games via websites, and whose remuneration reflects the number, participation and the general gaming activity of the players attracted, fall under the definition of affiliate of promotional activities with respect to games of chance of Article 45A of the Law. In order to provide their services to a licence holder, they must have an affiliate licence and be in the register of affiliates kept by the HGC.



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Dimitris has worked as Managing Partner and Deputy Managing Partner at BGP since 2017, before which he was a Partner at Bahas, Gramatidis & Associates in Athens since 1990 and at BGP since 2002. His professional associations and memberships include: the Piraeus Bar; the Greek Commercial Lawyers' Association; the Greek Association of Law and Economics; the Hellenic Association for Financial Law; the International Bar Association ("IBA"); the International Association of Defense Counsel ("IADC"); the European Justice Forum ("EJF") (Brussels: Correspondent for Greece); DRI Europe (Country Chair – Greece); CEDR (MyCEDR Member); the Chartered Institute of Arbitrators ("CIArb") (Associate); the Athens Mediation and Arbitration Organization ("EODID"); and the Hellenic Union of Mediators ("EED").

Dimitris is the author of numerous articles; please see at BGP's site (www.bahagram.com), including an indicative list of his latest publications.

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BGP traces its origins to Law Office Marios Bahas in 1970. In 1988, the original firm merged with Law Office Yanos Gramatidis. In 1990 it was named Bahas, Gramatidis & Associates with the participation of Dimitris Emvalomenos. Finally, in 2002, Bahas, Gramatidis & Associates merged with Law Office of Athanasios Felonis & Associates and Law Office Spyros Alexandris & Associates to form BGP.

At the core of BGP's practice is the representation of all types of legal entities – corporations, financial institutions, investment banks and non-profit entities – and individuals in complex corporate, business and financial transactions, as well as ADR/litigation. Headquartered in the city of Athens, the firm has associated offices in more than 105 countries worldwide.

BGP's commercial/business law team advises all types of legal entities and individuals on all aspects of carrying business in Greece, including commercial transactions, provision of services and regulatory compliance.

BGP represents a good number of multinational companies being leaders in their own business areas in complex advisory work and ADR/litigation. BGP is part of established worldwide networks promoting, among other topics, product liability and related issues, such as EJF, DRI Europe, IADC, World Law Group and the International Society of Primerus Law Firms.

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The **International Comparative Legal Guides** (ICLG) series brings key cross-border insights to legal practitioners worldwide, covering 58 practice areas.

Gambling 2025 features 38 Q&A jurisdiction chapters covering key issues, including:

- Relevant Authorities and Legislation
- Application for a Licence and Licence Restrictions
- Online Gambling
- Enforcement Powers/Sanctions
- Anticipated Reforms