

*Legal questionnaire completed by Norton Rose Fulbright • September 2025*

This document contains responses from the law firm listed above to a questionnaire distributed by NCMEC (questions are in **bold text**). Responses to the questionnaire may be limited to officially enacted legislation; it is possible that actual practice or enforcement of the law varies, and relevant court rulings or case law may also differ from legislative text. Responses have been reformatted and may have been slightly edited for clarity. Furthermore, responses may include commentary, paraphrasing, and unofficial translations of source material (e.g., national legislation) originally produced in other languages. Only official source documents in official languages should be relied upon as legally binding. This document serves to inform further research and does not constitute legal advice from NCMEC or the listed law firm.

**Is this jurisdiction a European Union (EU) Member State or otherwise subject to EU laws/regulations (such as an overseas territory or department of an EU Member State)?**

Yes

**1. What laws and regulations contain legal definitions of the following terms or corresponding terms in your local jurisdiction (links to existing U.S. legal definitions are included, where relevant, as background for comparison – please include definitions of any corresponding terms in your jurisdiction):**

**a. child or minor (18 U.S.C. 2256(1), <https://www.law.cornell.edu/uscode/text/18/2256>)**

Greek law contains no explicit statutory definition of "minor." Instead, Greece adheres to the UN Convention on the Rights of the Child (ratified by Law 2101/1992), which defines a child as any person under 18. Article 1 of the Convention on the Rights of the Child (CRC) and stipulates that:

*"For the purposes of the present Convention, a child means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier."*

The CRC has been ratified under Greek law by Law No. 2101/1992.

Article 127 of the Greek Civil Code states that (Unofficial English Translation): "*Any person who has reached the age of eighteen (adult) is capable of entering into any legal transaction,*", implying that a minor is any person who has not yet reached the age of eighteen.

The Greek Civil Code further provides age-based capacity rules: children under the age of 10 lack legal capacity; minors aged 14–18 have limited capacity. More specifically, article 135 of the Greek Civil Code provides that a minor who has reached the age of fourteen may freely dispose of everything they earn from his personal work or that was given to them for their use or to freely dispose of, and article 136 of the Greek Civil Code provides that a minor who has reached the age of 15 may, with the general consent of the persons exercising their custody, enter into an employment contract as an employee.



For criminal purposes, the Greek Penal Code treats those aged 12–15 and 15–18 as separate minor categories:

**Article 121 – Definition of Minors** (Unofficial English Translation)

1. For the purposes of this Chapter, the term minor refers to individuals who, at the time of the commission of the act, are at least 12 years old but not yet 18 years old.
2. Minors shall be subject to reformatory or therapeutic measures, or to detention in a special juvenile detention facility, in accordance with the provisions of the following articles.

**Article 126 – Criminal Treatment of Minors** (Unofficial English Translation)

1. A punishable act committed by a minor aged between 12 and 15 years shall not be attributed to them. The court may impose reformatory or therapeutic measures.
2. A minor who has committed a punishable act and is at least 15 years old shall also be subject to reformatory or therapeutic measures, unless it is deemed necessary to impose detention in a special juvenile detention facility, pursuant to the following article.

**Citations:**

- “Convention on the Rights of the Child”, Adopted by United Nations General Assembly Resolution 44/25 on 20 November 1989, Entered into force on 2 September 1990, in accordance with Article 49: <https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf>
- Law No. 2101/1992 “Ratification of the Convention on the Rights of the Child” Government Gazette 192/A/02.12.1992: <https://www.hellenicparliament.gr/UserFiles/67715b2c-ec81-4f0c-ad6a-476a34d732bd/7143273.pdf>
- Article 127 of the Greek Civil Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/astikos-kodikas/arthro-127-astikos-kodikas-enilikos>
- Article 128 of the Greek Civil Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/astikos-kodikas/arthro-128-astikos-kodikas-anikanoi-gia-dikaiopraxia>
- Article 135 of the Greek Civil Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/astikos-kodikas/arthro-135-astikos-kodikas-anilikos-poy-symplirose>
- Article 136 of the Greek Civil Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/astikos-kodikas/arthro-136-astikos-kodikas-anilikos-poy-symplirose>
- Article 121 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/pk/arthro-121-poinikos-kodikas-orismoι>
- Article 126 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-126-poinikos-kodikas-nomos-4619-2019-poiniki>

- b. child sexual exploitation (Missing Children’s Assistance Act of 2023, Section 2, (a)(1)(9), <https://www.congress.gov/118/bills/s2051/BILLS-118s2051es.pdf>)

There is no standalone definition of "child sexual exploitation" under Greek law. Instead, Greek law criminalizes various exploitative acts.



**Article 342 – Abuse of Minors (Unofficial English Translation)**

1. An adult who engages in sexual acts with a minor entrusted to them for supervision or custody, even temporarily, shall be punished as follows:
  - a) If the victim is under 14 years of age, with imprisonment of at least 10 years and a monetary penalty,
  - b) If the victim is 14 years of age or older, with imprisonment and a monetary penalty.

The commission of the act described in paragraph 1 constitutes an aggravating circumstance when committed:

- a) by a relative,
  - b) by a person residing with the minor or maintaining friendly relations with the minor's relatives,
  - c) by a teacher, educator, coach, or any other person providing instruction to the minor,
  - d) by a person receiving services from the minor, e) by a cleric with whom the minor maintains a spiritual relationship,
  - f) by a psychologist, doctor, nurse, or other specialist providing services to the minor,
  - g) by a person who exploits the minor's intellectual or physical disability.
2. The adult who makes gestures, proposals, or narrates, depicts, or presents acts of a sexual nature to a minor entrusted to them for supervision or custody, even temporarily, shall be punished with imprisonment of at least six months.

**Article 349 – Pimping (Unofficial English Translation)**

1. Whoever, in order to serve the debauchery of others, promotes or induces a minor into prostitution or incites or coerces or facilitates or participates in the prostitution of minors, shall be punished by imprisonment for up to 10 years and a monetary penalty.
2. The perpetrator shall be punished with imprisonment and a monetary penalty if the offense was committed:
  - a) against a person under 15 years of age;
  - b) through deceptive means;
  - c) by an ascendant relative by blood or marriage, or by an adoptive parent, spouse, guardian, or any other person entrusted with the minor's upbringing, education, supervision, or custody, even temporarily;
  - d) by a public official who commits or participates in the act in any manner during the exercise of their duties or by taking advantage of their position,
  - e) through the use of electronic means of communication; or
  - f) by offering or promising payment of money or any other form of compensation.
3. Except in the cases provided for in Article 323A, any person who professionally or for profit promotes, incites, or coerces another into prostitution, or exploits the proceeds of another's prostitution, shall be punished with imprisonment of at least 18 months and a monetary penalty. If the offense is committed by a public official, who commits or participates in the act in any manner during the exercise of their duties or by taking advantage of their position, constitutes an aggravating circumstance.

**Article 351A – Sexual Act with a Minor in Exchange for Remuneration (Unofficial English Translation)**

1. A sexual act with a minor committed by an adult in exchange for remuneration or other material benefits, or a sexual act between minors instigated by an adult in the



- same manner and carried out in the presence of said adult or another adult, shall be punished as follows:
- a) If the victim is under 12 years of age, with imprisonment of at least 10 years and a monetary penalty,
  - b) If the victim is 12 years of age but not yet 15 years old, with imprisonment and a monetary penalty, and
  - c) If the victim is 15 years of age or older, with imprisonment of at least three years and a monetary penalty.
2. If the act described in paragraph 1 results in the death of the victim, life imprisonment shall be imposed.

A principal form of child sexual exploitation is procurement for prostitution, which is defined in Article 349 of the Greek Penal Code. Punishable is any person who promotes or incites a minor into prostitution, or harbors, coerces, facilitates, or participates in the prostitution of minors. Aggravating circumstances include, indicatively, cases where the minor victim is under fifteen years of age, or where the perpetrator is the parent, grandparent (ascendant relative), adoptive parent, guardian, or another person entrusted with the minor's upbringing, education, supervision, or custody.

**Citations:**

- Article 342 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plitirofories/nomothesia/n-4619-2019/arthro-342-poinikos-kodikas-nomos-4619-2019-katahrisi>
- Article 349 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plitirofories/nomothesia/pk/arthro-349-poinikos-kodikas-mastropeia>
- Article 351A of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plitirofories/nomothesia/pk/arthro-351a-poinikos-kodikas-aselgeia-me-aniliko-enanti-amovis>

**c. sexually explicit conduct (18 U.S.C. 2256(2), <https://www.law.cornell.edu/uscode/text/18/2256>)**

Greek criminal law does not use the term "sexually explicit conduct," but related concepts are defined.

Paragraph 1 of Article 336 of the Greek Penal Code establishes the offense of rape, defined as the commission of a sexual act without the victim's consent, punishable by a minimum of ten years' imprisonment.

Article 336, paragraph 2 of the Greek Penal Code defines a "sexual act" as "*intercourse and acts of equal gravity thereto*" (Unofficial English Translation). As stated in the Explanatory Report of the Greek Penal Code, the term "*sexual act*" carries the meaning defined by jurisprudence and legal scholarship. According to the Greek Supreme Court Decision No. 216/2023, it refers to intercourse and other acts of equal gravity in terms of violating the legally protected good of sexual freedom without constituting intercourse.

Gestures of "*sexual nature*" are understood to be acts of lesser gravity which nonetheless offend sexual dignity, such as gestures, fondling, or touching of the body, when they do not



amount to a sexual act. Acts of a sexual nature are behaviours or gestures which, according to common perception, imply, indicate, or incite sexual acts.

Suggestive insinuations may be made explicitly or through gestures, which must pertain to the performance of sexual acts and do not require physical contact (Greek Supreme Court Decision No. 409/2017). Therefore, sexual harassment through direct or implicit suggestions—without contact involving genital organs—is also covered.

Furthermore, Article 337 of the Greek Penal Code criminalizes sexual harassment and insults to dignity: e.g., any person who, by obscene gestures, explicit proposals, or exposure of genitals, grossly offends another's sexual dignity is punishable by up to one year's imprisonment. Recently, a new paragraph has been added to Article 337 to address cases where such violation occurs via the internet (see Article 337(5) below).

**Article 337 – Violation of Sexual Dignity** (Unofficial English Translation)

1. Any person who, through gestures of a sexual nature, proposals concerning sexual acts, sexual acts performed in the presence of another, or by exposing their genital organs, grossly offends the dignity of another, shall be punished with imprisonment of up to one year or a monetary penalty. Criminal prosecution requires a complaint, unless the victim is a minor.
2. The act described in the preceding paragraph shall be punished with imprisonment of up to two years or a monetary penalty if the victim is under 12 years of age.
3. An adult who, via the internet or other means or information technologies, establishes contact with a person under 15 years of age and, through gestures or proposals, offends the minor's dignity in the sphere of their sexual life, shall be punished with imprisonment of at least two years. If a meeting follows, the adult shall be punished with imprisonment of at least three years.
4. Any person who makes gestures of a sexual nature or formulates proposals for the performance of sexual acts towards a person who is dependent on them in an employment context, or exploits their position in relation to a person engaged in a job-seeking process, shall be punished with imprisonment of up to three years.
5. Any person who, without the recipient's consent, shares or sends to another—by any means or through the use of information and communication technologies—a real or fabricated image, or visual or audiovisual material recorded on an electronic or other medium, depicting genital organs in a manner likely to cause fear, distress, or serious psychological harm to the recipient, shall be punished with imprisonment of up to three years.

If the offense described in the previous paragraph is committed against a minor, or against a person who holds the status of a public representative, journalist, or human rights defender, or if the perpetrator is in a hierarchical or dependent relationship with the victim, this constitutes a particularly aggravating circumstance.

Finally, pursuant to Article 339 (Sexual Acts Involving or in the Presence of Minors), which provision criminalises sexual acts involving minors under the age of 15, with penalties scaled according to the age of the victim, and the nature of the act.



Pursuant to Article 339, paragraph 1, any person who engages in a sexual act with a person under the age of 15, or deceives such a person into performing or undergoing a sexual act, unless the act is punishable under more severe provisions (e.g., Articles 342 or 351A). The penalties are as follows:

- a) If the victim is under 12 years of age: imprisonment of at least 10 years.
- b) If the victim is between 12 and 15 years of age: imprisonment (no minimum specified, but subject to judicial discretion).

With Paragraph 2 a protective and rehabilitative approach to consensual sexual activity between minors is introduced. It provides that sexual acts between minors under 15 years of age are not punishable, unless the age difference exceeds three years, and in such cases, only reformatory or therapeutic measures may be imposed, reflecting the juvenile justice system's emphasis on education and rehabilitation rather than punishment.

Paragraph 3 of the aforementioned Article penalises the act of inducing or persuading a minor under 15 years of age to witness a sexual act, either in person or via information and communication technologies, without participating in it. The penalties vary based on the age of the minor: More specifically, if the minor is under 14: imprisonment of at least two years and a monetary fine, and if the minor is 14 or older: imprisonment of up to three years or a monetary fine.

#### **Citations:**

- Article 337 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-337-poinikos-kodikas-nomos-4619-2019-prosvoli-tis>
- Article 336 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-336-poinikos-kodikas-nomos-4619-2019-viasmos>
- Article 339 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/pk/arthro-339-poinikos-kodikas-apoplanisi-paidion>
- Explanatory Report of Law No. 4619/2019 – Greek Penal Code: [https://ministryofjustice.gr/wp-content/uploads/2019/08/2bNomos\\_%CE%91%CE%99%CE%A4%CE%99%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%9A%CE%97-%CE%95%CE%9A%CE%98%CE%95%CE%A3%CE%97-N.-4619\\_2019-%CE%A0.%CE%9A-1.pdf](https://ministryofjustice.gr/wp-content/uploads/2019/08/2bNomos_%CE%91%CE%99%CE%A4%CE%99%CE%9F%CE%9B%CE%9F%CE%93%CE%99%CE%9A%CE%97-%CE%95%CE%9A%CE%98%CE%95%CE%A3%CE%97-N.-4619_2019-%CE%A0.%CE%9A-1.pdf)
- Greek Supreme Court Decision No. 216/2023: (Unofficial English Translation - [https://www.areiospagos.gr/nomologia/apofaseis\\_DISPLAY.asp?cd=UBTXCV9HAGI10DP0S656Y3C0GMSPIG&apof=216\\_2023&info=%D0%CF%C9%CD%C9%CA%C5%D3%20-%20%20C6#](https://www.areiospagos.gr/nomologia/apofaseis_DISPLAY.asp?cd=UBTXCV9HAGI10DP0S656Y3C0GMSPIG&apof=216_2023&info=%D0%CF%C9%CD%C9%CA%C5%D3%20-%20%20C6#)
- Greek Supreme Court Decision No. 409/2017: (Unofficial English Translation - [https://www.areiospagos.gr/nomologia/apofaseis\\_DISPLAY.asp?cd=2EMQQJSIO46E5M7W4EZIT6EBBYF9K8&apof=409\\_2017&info=%D0%CF%C9%CD%C9%CA%C5%D3%20-%20%20C5](https://www.areiospagos.gr/nomologia/apofaseis_DISPLAY.asp?cd=2EMQQJSIO46E5M7W4EZIT6EBBYF9K8&apof=409_2017&info=%D0%CF%C9%CD%C9%CA%C5%D3%20-%20%20C5)



d. **child sexual abuse (18 U.S.C. 2243(a), <https://www.law.cornell.edu/uscode/text/18/2243>)**

Sexual abuse, in general, is defined in Article 2 of Law 3896/2010 as: "*Any form of unwanted verbal, psychological, or physical behavior of a sexual nature, resulting in the violation of a person's dignity, particularly through the creation of an intimidating, hostile, degrading, humiliating, or offensive environment around them. Provisions that prescribe sanctions for the demonstration of such behavior shall apply as in force*" (Unofficial English Translation). This law incorporates the provisions of the European Union (EU) Directive 2006/54/EC into Greek national law.

"Child sexual abuse" is not a defined term in Greek law. Rather, Greek law addresses the underlying conduct. Namely, Article 336 of the Greek Penal Code (Rape), punishes any non-consensual sexual act by violence or threat; importantly, paragraph 3 provides life imprisonment if the victim is a minor or the act results in death (see below). In practice, "enticement, grooming, or sextortion" of children would fall under these and other provisions (e.g., Articles 342, 348B, 348C, etc.) as addressed above.

**Article 336 – Rape** (Unofficial English Translation)

1. Any person who, through physical violence or threat of serious and imminent danger to life or physical integrity, coerces another into performing or tolerating a sexual act shall be punished with imprisonment of at least 10 years.
2. A sexual act is defined as intercourse and acts of equal gravity thereto.
3. If the act described in paragraph 1 is committed by two or more perpetrators acting jointly, or results in the death of the victim, or if the victim is a minor, life imprisonment shall be imposed.
4. Any person who, apart from the case described in paragraph 1, performs a sexual act without the consent of the victim, shall be punished with imprisonment of up to 10 years.

**Citations:**

- Law 3896/2010, Government Gazette A' 207/08.12.2010 "Implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation – Harmonisation of the applicable legislation with Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 and other related provisions": <https://search.et.gr/el/fek/?fekId=427611>
- Article 336 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-pliροφοries/nomothesia/n-4619-2019/arthro-336-poinikos-kodikas-nomos-4619-2019-viasmos>

e. **child pornography or child sexual abuse material (CSAM) (18 U.S.C. 2256(8), <https://www.law.cornell.edu/uscode/text/18/2256>)**

The definition of child pornography and child pornographic material is provided in the Greek Penal Code, as amended by Law 4267/2014 (Government Gazette 137/A/12-6-2014). Specifically, Article 348A applies to persons under 18 and outlaws production, distribution, publication, display, etc., of "*child pornography material*", to including any depiction actual or simulated.



**Article 348A Child Pornography (Unofficial English Translation)**

1. Whoever, with intent, produces, distributes, publishes, displays, imports into or exports from the territory, transports, offers, sells, or otherwise makes available, purchases, procures, acquires, or possesses child pornography material, or disseminates or transmits information regarding the commission of any of the aforementioned acts, shall be punished with imprisonment of at least one year and a monetary fine.
2. Whoever, with intent, produces, offers, sells, or in any way makes available, distributes, transmits, purchases, procures, or possesses child pornography material, or disseminates information regarding the commission of the aforementioned acts through information systems, shall be punished with imprisonment of at least two years and a monetary fine.
3. For the purposes of paragraphs 1 and 2, child pornography material shall mean the depiction or actual or simulated representation, in electronic or other material form, of the genitals or the body in general of a minor or a person appearing to be a minor, in a manner that clearly provokes sexual arousal, as well as the actual or simulated sexual act performed by or with a minor or a person appearing to be a minor.
4. The acts referred to in paragraphs 1 and 2 shall be punishable by imprisonment and a monetary fine:
  - a) if committed professionally,
  - b) if the production of child pornography material is associated with the exploitation of the minor's need, mental or intellectual illness, or physical disability due to organic disease, or with the use or threat of violence against the minor, or with the use of a minor under the age of 15, or if the production of such material exposed the minor's life to serious danger
  - c) if the perpetrator of the production of child pornography material is a person entrusted with the supervision or custody of the minor, even temporarily.
5. If the production of child pornography material involves the use of a minor under the age of 12, a sentence of at least 10 years of imprisonment and a monetary fine shall be imposed. The same penalty shall apply if the acts referred to in points (b) and (c) of the previous paragraph result in serious bodily harm to the victim; if they result in death, life imprisonment shall be imposed.
6. Whoever knowingly gains access to child pornography material through information systems shall be punished with imprisonment of up to three years or a monetary fine.

**Citations:**

- Law 4267/2014, Government Gazette 137/A/12-6-2014:  
<https://search.et.gr/el/fek/?fekId=513101>
  - Article 348A of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plitirofories/nomothesia/n-4619-2019/arthro-348a-poinikos-kodikas-nomos-4619-2019-pornografia>
- f. **computer-generated images or videos of child pornography or CSAM (created by artificial intelligence or morphed) (18 U.S.C. 2256(8) & (9), <https://www.law.cornell.edu/uscode/text/18/2256>)**

Greek law has no separate provision for AI-generated or morphed images. Such material is treated as "simulated" child pornography criminalised under Article 348A(3). The provision criminalises all forms of virtual or artificially created content of child pornography. This



paragraph covers cases where a non-minor appears as a minor, a minor's image is used to fake a sexual act, or images are entirely fabricated. Thus, computer-generated child pornographic images are criminalized under the existing simulated child pornography provisions (see the definition of "child pornography" above).

**Article 348A paragraph 3 – Child Pornography: (Unofficial English Translation)**

For the purposes of paragraphs 1 and 2, child pornography material shall mean the representation or the actual or simulated depiction, in electronic or other tangible medium, of the genitals or the body in general of a minor or of a person appearing to be a minor, in a manner that clearly provokes sexual arousal, as well as the actual or simulated sexual act performed by or with a minor or a person appearing to be a minor.

**Citations:**

- Law 4267/2014, Government Gazette 137/A/12.6.2014, "Combating the Sexual Abuse and Exploitation of Children and Child Pornography and Other Provisions": <https://search.et.gr/el/fek/?fekId=513101>
- Article 348A of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-348a-poinikos-kodikas-nomos-4619-2019-pornografia>

- g. **enticement or grooming (encouraging, persuading, or coercing a child to engage in sexual activity or to create child pornography or CSAM) (18 U.S.C. 2422(b), <https://www.law.cornell.edu/uscode/text/18/2422>)**

There is no single statutory definition of "grooming", but Greek law criminalizes the underlying behaviours:

**Article 339 – Sexual Acts with Minors or in Their Presence (Unofficial English Translation)**

1. Whoever engages in a sexual act with a person under the age of 15, or deceives such person resulting in the performance or submission to such an act, shall be punished — unless a more severe penalty is provided under Articles 342 or 351A — as follows:
  - a) if the victim is not yet 12 years old, with imprisonment of at least 10 years,
  - b) if the victim is at least 12 years old, with imprisonment.
2. Sexual acts between minors under the age of 15 shall not be punishable, unless the age difference between them exceeds three years, in which case only reformatory or therapeutic measures may be imposed.
3. Whoever induces or entices a minor under the age of 15 to observe — through the use of information and communication technology — or to be present during a sexual act between others, without participating in it, shall be punished with imprisonment of at least two years and a monetary fine, if the minor is under 14 years of age, with imprisonment of up to three years or a monetary fine, if the minor is at least 14 years old.

**Article 342 – Abuse of Minors (Unofficial English Translation)**

1. An adult who engages in sexual acts with a minor entrusted to them for supervision or custody, even temporarily, shall be punished as follows: a) If the victim is not yet 14 years old, with imprisonment of at least 10 years and a monetary penalty; b) If the victim is at least 14 years old, with imprisonment and a monetary penalty.



The offense under paragraph 1 is considered aggravated if committed: a) by a relative, b) by a person residing with the minor or maintaining friendly relations with the minor's relatives, c) by a teacher, educator, coach, or any person providing instruction to the minor, d) by a person receiving services from the minor, e) by a cleric with whom the minor maintains a spiritual relationship, f) by a psychologist, physician, nurse, or other specialist providing services to the minor, g) by a person who exploits the minor's intellectual or physical disability.

2. An adult who makes gestures, suggestions, or narrates, depicts, or presents acts of a sexual nature to a minor entrusted to them for supervision or custody, even temporarily, shall be punished with imprisonment of at least six months.

**Article 348 – Facilitation of Offences Against Minors** (Unofficial English Translation)

1. Whoever, professionally or for profit, attempts to facilitate — even covertly — a sexual act with a minor, by publishing an advertisement, image, telephone number, by transmitting electronic messages, or by any other means, shall be punished with imprisonment of at least three years and a monetary fine.
2. Whoever organizes, finances, directs, supervises, advertises, or intermediates by any means or method in the conduct of travel with the purpose that participants therein commit sexual acts against a minor, shall be punished with imprisonment of up to ten years. Whoever, with the above intent, participates in such travel shall be punished with imprisonment of at least one year, irrespective of any liability for the commission of other criminal offences.

**Article 351A – Sexual Acts with a Minor in Exchange for Remuneration** (Unofficial English Translation)

1. A sexual act with a minor committed by an adult in exchange for remuneration or other material consideration, or a sexual act between minors induced by an adult in the same manner and performed in the presence of that adult or another adult, shall be punished:
  - a) if the victim is under 12 years old, with imprisonment of at least 10 years and a monetary fine;
  - b) if the victim is at least 12 years old, but not yet 15 years old, with imprisonment and a monetary fine;
  - c) if the victim is at least 15 years old, with imprisonment of at least three years and a monetary fine.
2. If the act described in the first paragraph results in the death of the victim, a sentence of life imprisonment shall be imposed.

In fact, when the internet — and more specifically "information systems" — is used, the Greek legislator criminalizes the phenomenon of "online grooming" of children under Article 348B of the Greek Penal Code.

**Article 348B – Solicitation of Children for Sexual Purposes** (Unofficial English Translation)

Whoever, intentionally and through the use of information systems, proposes to a minor who is not yet 15 years old to meet with them or with a third party, for the purpose of committing against the minor any of the offences provided for in Article 339(1) and (2) or Article 348A, and such proposal is followed by further acts leading to such a meeting, shall be punished with imprisonment of at least two years and a monetary fine.



Finally, Article 348C penalizes the inducement or enticement of minors to participate in pornographic performances. It applies to individuals who induce or entice minors to take part in such performances of a pornographic nature, as well as those who organize or attend them.

**Article 348C – Pornographic Performances Involving Minors (Unofficial English Translation)**

1. Whoever induces or entices a minor to participate in pornographic content, or organizes such performances, shall be punished as follows:
  - a) if the victim is not yet 12 years old, with imprisonment,
  - b) if the victim is at least 12 years old but not yet 14 years old, with imprisonment of up to 10 years,
  - c) if the victim is at least 14 years old, with imprisonment of at least two years.Whoever, knowingly, attends a pornographic performance involving minors shall be punished under cases (a) and (b) above, with imprisonment of at least two years, under case (c), with imprisonment of at least one year.
2. If the acts referred to in the previous paragraph are committed through the use of violence or threat, in order to compel a minor to participate in pornographic performances, or with the intent of obtaining financial gain from such performances, the following penalties shall apply:
  - a) in case (a) of the previous paragraph, imprisonment of at least 10 years,
  - b) in case (b), imprisonment,
  - c) in case (c), imprisonment of up to 10 years.
3. For the purposes of the preceding paragraphs, a pornographic content shall mean an organised live presentation intended for viewing or listening, including through the use of information and communication technologies:
  - a) involving a minor engaging in an actual or simulated act of a sexual nature; or
  - b) involving the genitals or the body in general of a minor, in a manner that clearly provokes sexual arousal.

**Citations:**

- Article 339 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-339-poinikos-kodikas-nomos-4619-2019-genetisies>
- Article 342 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-342-poinikos-kodikas-nomos-4619-2019-katahrisi>
- Article 348 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-348-poinikos-kodikas-nomos-4619-2019-dieykolynsi>
- Article 351A of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-351a-poinikos-kodikas-nomos-4619-2019-genetisia>
- Article 348B of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-348v-poinikos-kodikas-nomos-4619-2019-proselkysi>
- Article 348C of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-348g-poinikos-kodikas-nomos-4619-2019>



**h. legal age of consent for sexual activity – are there laws and regulations, if so, what ages are specified?**

Pursuant to paragraph 1 of Article 339 of the Greek Penal Code the legal age of consent for sexual activity is 15 years (Unofficial English Translation).

1. Whoever engages in a sexual act with a person under the age of 15, or deceives such person resulting in the performance or submission to such an act, shall be punished — unless a more severe penalty is provided under Articles 261 and 262 — as follows:
  - a) if the victim is not yet 12 years old, with imprisonment from 10 to 15 years,
  - b) if the victim is 12 years old but not yet 14 years old, with imprisonment of up to 10 years and if the victim is 14 years old, with imprisonment from two to five years and a monetary fine.
2. Sexual acts between minors under the age of 15 shall not be punishable, unless the age difference between them exceeds three years, in which case only reformatory or therapeutic measures may be imposed.
3. Whoever incites or entices a minor under the age of 15 to observe, through the use of information and communication technology, or to be present during a sexual act involving others, without participating in it, shall be punished with imprisonment of at least two years and a monetary fine if the minor is under 14 years of age, and with imprisonment of up to three years or a monetary fine if the minor has reached the age of 14.

As presented above, Article 339(1) penalizes sexual intercourse with a person under 15 (with penalties varying by age: 10–15 years' imprisonment if victim is under 12; up to 10 years if age 12–14; 2–5 years with fine if age 14–15). Sexual acts between two minors under 15 are not criminal unless their age difference exceeds three years. Article 339(3) also punishes an adult who entices (via ICT) a minor under 15 to a sexual act, with at least 2 years' imprisonment if the minor is under 14 (up to 3 years if the minor is 14). Thus, the statutory consent age is 15 in Greece.

**Citation:**

- Article 339 of the Greek Penal Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-339-poinikos-kodikas-nomos-4619-2019-genetisies>

**i. Sextortion (extorting money or sexual favors from a child by threatening to share sexually explicit, child pornography or CSAM images of the child) (Missing Children's Assistance Act of 2023, Section 2, (a)(1)(8), <https://www.congress.gov/118/bills/s2051/BILLS-118s2051es.pdf>)**

In the Greek legal order, the term "sextortion" is not explicitly defined as distinct offense; however, it may fall within the scope of the felony offence of trafficking in child pornography material under Article 384A of the Greek Penal Code (Unofficial English Translation):

1. Whoever, intentionally, produces, distributes, publishes, displays, imports into or exports from the territory, transports, offers, sells, or otherwise makes available, purchases, procures, acquires, or possesses child pornography material, or disseminates or transmits information regarding the commission of the aforementioned acts, shall be punished with imprisonment of at least one year and a



monetary fine.

2. Whoever, intentionally, produces, offers, sells, or in any way makes available, distributes, transmits, purchases, procures, or possesses child pornography material, or disseminates information regarding the commission of the aforementioned acts, through information systems, shall be punished with imprisonment of at least two years and a monetary fine.

Furthermore, the offence of "sextortion" may also fall within the scope of the misdemeanor of violation of sexual dignity, as provided under Article 337 paragraph 3 of the Greek Penal Code (Unofficial English Translation):

3. An adult who, through the internet or other means of communication, establishes contact with a person who is not yet 15 years old and, through obscene gestures or proposals, violates the dignity of the minor in the sphere of their sexual life, shall be punished with imprisonment of at least two years.
4. Whoever shares or sends to another person, without their consent, by any means or through the use of information and communication technology, a real or fabricated image or visual or audiovisual material recorded on an electronic or other medium, depicting genital organs in a manner likely to cause fear, distress, or serious psychological harm to the recipient, shall be punished with imprisonment of up to three years. If the offense described above is committed against a minor or a person who is a public representative, journalist, or human rights defender, or if the perpetrator is in a hierarchical or dependent relationship with the victim, a particularly aggravating circumstance shall apply.

Additionally, Article 346 of the Greek Penal Code, which criminalizes revenge pornography (Unofficial English Translation):

1. Any person who, without legal right, discloses to a third party or publicly posts a real, altered, or fabricated image or any kind of visual or audiovisual material depicting a non-public act of another person relating to their sexual life shall be punished with imprisonment of at least three years and a monetary fine.
2. Any person who threatens another with the commission of the acts described in paragraph 1 shall be punished with imprisonment of at least one year. If the perpetrator of the aforementioned act coerces another into an act, omission, or tolerance to which they are not legally obliged, they shall be punished with imprisonment of at least two years.
3. The act described in paragraph 1 shall be punished with imprisonment of up to eight years and a monetary fine if it is committed:
  - a) by posting on the internet or on a social media platform with an indefinite number of recipients,
  - b) by an adult and concerns a minor;
  - c) with the intent of obtaining financial gain for the perpetrator or a third party.

In practice, sextortion – threatening to expose CSAM unless demands are met – could be prosecuted under these provisions (trafficking in child porn, sexual dignity, extortion, or revenge porn laws).

#### **Citations:**

- Article 384A of the Greek Penal Code: (<https://www.lawspot.gr/nomikes-plirofories/nomothesia/pk/arthro-384a-poinikos-kodikas-katastoli-fthoron-poy->

[prokaloy-n-koino](#) )

- Article 346 of the Greek Penal Code: (<https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-346-poinikos-kodikas-nomos-4619-2019-ekdikitiki> )

**2. Please explain any legal or regulatory requirement or recommendation for Online Platforms to undertake any of the following activities on their systems to protect children online from sexual exploitation:**

Greek law currently imposes indirect but significant legal obligations on online platforms regarding Child Sexual Abuse Material (CSAM), primarily through the implementation of the EU Regulation 2022/2065 (the Digital Services Act or DSA) via Law no. 5099/2024 as in force as of April 5th, 2024. Please refer to the EU questionnaire for additional detail on EU-wide legislation.

**a. review, screen, moderate, or detect content to identify child pornography or CSAM content**

The DSA is transposed into Greek law pursuant to Law 5099/2024 with the aim of providing a safe, predictable and trusted online environment'. Consistent with the DSA, Law 5099/2024 does not impose a general obligation to proactively monitor or review content, but it does require platforms to respond effectively and act for illegal content removal (including CSAM), when such content is flagged or ordered for removal by competent authorities.

Pursuant to Article 49 of the DSA, EU member states are required to designate one or more 'competent authorities' responsible for supervising providers of intermediary services and ensuring the enforcement of the DSA. In accordance with Law no. 5099/2024, the Hellenic Telecommunications and Post Commission (**HTPC**) has been appointed as the Digital Services Coordinator for Greece. Additionally, the Greek National Council for Radio and Television and the Digital Services Coordinator are designated as other competent authorities under the same legislative framework. Finally, in accordance with Law no. 5099/2024, the Cyber Crime Division of the Hellenic Police is designated as the competent authority for receiving notifications pursuant to Article 18 of the DSA.

According to Article 18 of the DSA, providers of hosting services who become aware of information that raise reasonable suspicion of the commission or imminent commission of a criminal offence involving a threat to life or safety are under an obligation to promptly notify the Greek Cyber Crime Division.

Pursuant to Law 5099/2024, Online Platforms are obligated to act expeditiously to remove or disable access to illegal content (including CSAM) upon receiving a removal order from Greek authorities and are required to maintain points of contact for authorities and users to report such content, and to publish annual transparency reports detailing content moderation actions.

**b. review, screen, moderate, or detect content to identify enticement, grooming, or sextortion of a child**

This issue is regulated at the EU level under the DSA and there are no notable deviations



from the DSA in this respect in Greece. Please refer to the EU questionnaire for more information on EU-wide legislation.

- c. report child pornography, CSAM, enticement, grooming, or sextortion that they become aware of or are notified about on their systems to a law enforcement or government agency or nongovernmental organization**

Based on the provisions of Law No. 5099/2024 and the DSA, Online Platforms are directly legally mandated to report certain types of illegal content, including CSAM, child pornography, and related offenses such as enticement, grooming, and sextortion, once they become aware of such content.

Under Article 18 of the DSA, which is directly applicable and supplemented by Article 9 of Law 5099/2024, providers of hosting services (including Online Platforms) are required to notify the competent authority when they become aware of information that gives rise to a suspicion of a criminal offense involving a threat to life or safety. The aforementioned includes offenses such as CSAM, grooming, enticement, and sextortion.

The Cyber Crime Division of the Hellenic Police is designated by Law 5099/2024 as the competent authority for receiving such notifications in Greece. Platforms must report directly to this division when the triggering condition is met.

The obligation applies to hosting service providers, which includes platforms that store user-generated content (e.g., social media, cloud services, forums). The obligation is not limited to CSAM alone, but extends to any content that suggests a criminal threat to life or safety, which includes grooming and sextortion.

Platforms are not explicitly mandated by Greek law to report CSAM or grooming to law enforcement or non-governmental organizations (**NGOs**) (e.g., Safeline or INHOPE hotlines), although platforms may choose to coordinate with authorities voluntarily. The legal obligation enforced by the DSA and the Law 5099/2024, is strictly to notify law enforcement, specifically the Cyber Crime Division.

- d. remove or take down any child pornography, CSAM, enticement, grooming, or sextortion that they identify, become aware of, or are notified about**

This issue is regulated at the EU level under the DSA and there are no notable deviations from the DSA in this respect in Greece. Please refer to the EU questionnaire for more information on EU-wide legislation.

- e. review content by human moderators to screen or moderate for child pornography or CSAM**

The Greek Data Protection Authority has issued guidance emphasizing the protection of children's data and identities, especially in CSAM cases. While this reflects a strong stance on privacy and victim protection, it does not impose specific obligations on platforms regarding moderation methods.



Currently, in practice many online platforms operating in Greece voluntarily use automated tools to detect CSAM, often in cooperation with international organizations like NCMEC. Human moderation may be used in conjunction with these tools, but it is not currently a legal requirement under Greek law.

There is no legislation in Greece explicitly requiring platforms to employ human moderation for child pornography or CSAM. The DSA encourages platforms to have content moderation systems, but does not specify human or automated. Greek domestic law contains no separate moderation mandate.

- f. remove child pornography, CSAM, enticement, grooming, or sextortion from their systems when notified of its presence by a victim, nongovernmental organization, law enforcement, or government agency**

This issue is regulated at the EU level under the DSA and there are no notable deviations from the DSA in this respect in Greece. Please refer to the EU questionnaire for more information on EU-wide legislation.

- g. use any specific technology to detect, remove, block, or take down any child pornography, CSAM, enticement, grooming, or sextortion, including:**

- i. **“Hashing technology”** (<https://www.thorn.org/blog/hashing-detect-child-sex-abuse-imagery/>). Many Online Platforms hash and tag images and videos of child pornography or CSAM and then use hashing technology to scan content on their systems to detect the distribution of child pornography or CSAM online so it can be removed.

Greek law does not directly mandate use of hashing systems (like PhotoDNA) to detect CSAM. However, industry best practice—endorsed by EU Commission proposals—is to use hashing (e.g. PhotoDNA) to detect known CSAM. Greece does not require it statutorily.

- ii. **Artificial intelligence or machine learning tools to detect the presence of child pornography, CSAM, enticement, grooming, or sextortion.**

Similarly Greek law imposes no binding requirement for AI/ML detection tools. Greece currently imposes no specific obligations to deploy AI/ML detection. Platforms may choose to use AI/ML tools to improve detection, but this is voluntary at present.

- h. if the applicable laws or regulations require some, but not all, Online Platforms to perform any of the above activities, describe how the differing requirements apply. For example, are differences based on the number of online users, types of services offered, etc.?**

This issue is regulated at the EU level under the DSA and there are no notable deviations from the DSA in this respect in Greece. Please refer to the EU questionnaire for more information on EU-wide legislation.

**Citations:**

- Digital Services Act, (Regulation (EU) 2022/2065): <http://data.europa.eu/eli/reg/2022/2065/oj>

- Law no. 5099/2024, Government Gazette 48/A/05.04.2024, “Adopting measures for the implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (‘Digital Services Act’) and other provisions.”: <https://search.et.gr/el/fek/?fekId=763445>

### **3. Are Online Platforms legally required or recommended to implement any method to verify the age of a user before allowing access to an online platform?**

Greece imposes no specific nationwide age-verification scheme for all online platforms beyond existing EU rules. Article 8 of the General Data Protection Regulation (GDPR) (implemented in Greece through Greek Law 4624/2019) requires parental consent for processing children's data under 15 but does not mandate how platforms verify age.

Law 4954/2022 introduced a voluntary a special electronic application named "KidsWallet" to assist age verification. Article 80A(5) of Law 4954/2022 states that KidsWallet provides functionality to verify a minor's age in either the physical or digital environment, and that this electronic verification is equivalent to proving age with an official ID.

However, use of KidsWallet by platforms is not mandatory; it merely offers a secure way for parents or minors to verify age. In practice, platforms targeting children under 15 must obtain verifiable parental consent (as per the GDPR), but Greek law does not impose additional technology or process requirements for age verification in addition to the requirements of the GDPR.

#### **Citations:**

- General Data Protection Regulation (Regulation (EU) 2016/679): <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>
- Greek Law 4624/2019, Government Gazette 137/A/29.08.2019, “Hellenic Data Protection Authority, Implementation Measures of Regulation (EU) 2016/679 and Incorporation of Directive (EU) 2016/680”: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/nomos-4624-2019>
- Law 4954/2022, Government Gazette 136/A/09.07.2022, “Supplementary Measures for the Implementation of Regulation (EU) 2019/788 on the European Citizens’ Initiative and Implementing Regulation (EU) 2019/1799”, Article 80A: <https://search.et.gr/el/fek/?fekId=767085>

### **4. Are Online Platforms legally required or recommended to implement any method to obtain parental consent before a child uses the services of such Online Platforms?**

Please refer to the EU questionnaire for EU-wide legislation in respect of the GDPR for the conditions regarding the consent of children with regard to information society services.

Article 8 of the GDPR (and implementing Greek Law 4624/2019) requires that children under 15 obtain verifiable parental consent for data processing in direct offers of online services. Greek law adopts this threshold. Therefore, if a platform offers information society services directly to children under 15, it must obtain parental consent before processing the child's personal data. For children aged 15–17, the child's own consent is sufficient.

In addition, the "KidsWallet" app may additionally assist in managing parental control and consent under, as Article 80A of Law 4954/2022.

Article 80A(4) of Law 4954/2022 provides that parents using KidsWallet have digital tools to monitor and restrict their minor child's device usage (including access to specific apps or websites). Thus, while the GDPR sets the age and consent framework, the KidsWallet app offers an optional means to facilitate parental consent and control. No additional platform-specific consent mechanism is mandated by Greek law.

Article 80 paragraph 4 (Unofficial English Translation):

The special electronic application "KidsWallet" provides the person exercising parental responsibility or, as the case may be, custody or actual care of minors, with functionalities for parental control over the use of the device on which it is installed. Parental control functionalities are understood to mean digital features that allow for the restriction or monitoring of minors' access to online communication services and digital content, particularly with regard to specific applications or websites.

### **Citations:**

- General Data Protection Regulation (Regulation (EU) 2016/679): <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>
- Greek Law 4624/2019, Government Gazette 137/A/29.8.2019, "Hellenic Data Protection Authority, Implementation Measures of Regulation (EU) 2016/679 and Incorporation of Directive (EU) 2016/680": <https://www.lawspot.gr/nomikes-plirofories/nomothesia/nomos-4624-2019>
- Law 4954/2022, Government Gazette 136/A/09.07.2022, "Supplementary Measures for the Implementation of Regulation (EU) 2019/788 on the European Citizens' Initiative and Implementing Regulation (EU) 2019/1799", Article 80A: <https://search.et.gr/el/fek/?fekId=767085>

**5. Are there legal remedies for children who have been victimized by online child sexual exploitation? This may include children who are victimized by the distribution of child pornography or CSAM imagery in which they are depicted, or children victimized by enticement, grooming or sextortion. If such legal remedies exist, do they include:**

**a. The ability to stop the publication of the pornography or CSAM imagery by the Online Platform?**

Greek legislation follows the EU's GDPR, specifically Article 17, as well as the DSA, and does not provide any additional provisions regarding the deletion of such content. Please refer to the EU questionnaire for more information on EU-wide legislation.

Under Article 18 of Law 4954/2022 (on combating child sexual abuse), which contains the Greek legislative mechanisms available when CSAM or pornographic content involving minors is identified, a public prosecutor can order the termination or blocking of websites hosting child pornography.

Law 4954/2022, **Article 18** (Unofficial English Translation)

1. By order of the competent public prosecutor of first instance, or the appellate prosecutor if the case is pending before the court of appeal, the termination of a website hosted in Greece that contains or disseminates child pornography material shall be ordered. This order must be specifically and fully reasoned, shall be served to the hosting service provider of the said website, and shall be executed immediately.
2. By order of the competent public prosecutor of first instance, or the appellate prosecutor if the case is pending before the court of appeal, the temporary



- deactivation of the domain name shall be ordered for a period of two months, in cases where it cannot be determined whether the website containing or disseminating child pornography material is hosted within or outside Greece, and the domain or subdomain has been assigned in Greece. Within the same period, the domain name holder may file an appeal before the head of the public prosecutor's office of first instance or the head of the appellate prosecutor's office, respectively, who shall decide within two months on the permanent termination or reactivation of the domain name. If this deadline lapses without action, the domain name shall be terminated. The above orders must be specifically and fully reasoned, shall be served to the domain name holder and to the Hellenic Telecommunications and Post Commission (EETT), and shall be executed immediately.
3. By order of the competent public prosecutor of first instance, or the appellate prosecutor if the case is pending before the court of appeal, access to a website that contains or disseminates child pornography material shall be blocked, where the website is not hosted in Greece and does not belong to a domain or subdomain assigned in Greece. The website owner may file an appeal before the head of the public prosecutor's office of first instance or the head of the appellate prosecutor's office, respectively, within a period of two months. The head of the competent prosecutor's office shall decide within the same period. Prosecutorial orders must be specifically and fully reasoned and shall be served to the website owner, if identified, and to the EETT. The EETT shall forward the above orders to internet access service providers and request their immediate implementation and the notification of users. Internet access service providers are understood to mean all entities registered in the Registry of Network and Electronic Communications Service Providers maintained by the EETT, pursuant to Law 4070/2012 (Government Gazette A' 82), as in force.

In addition, the Cyber Crime Division, upon initiation of criminal prosecution for the offense of child pornography, may act in accordance with the following provisions:

#### **Department for Online Child Protection and Digital Investigation**

The responsibilities of the Department for Online Child Protection and Digital Investigation (as published by the Hellenic Police) include:

- a) The investigation and prosecution of offenses committed against minors through the use of the internet and other means of electronic or digital communication and storage,
- b) The investigation of cases involving online or electronic harassment (cyberbullying) and racism,
- c) The provision of assistance to competent state authorities for the prevention of suicides announced via the internet, as well as to authorities investigating offenses committed online in accordance with applicable legislation.

Accordingly, the deletion of website content is also included in the responsibilities of this department. The Cyber Crime Division cooperates with online platforms to identify and remove illegal content and may request the deletion of such material from the platforms.

Separately, a minor has a GDPR-based right to erasure: Article 56 of Law 4624/2019 (reflecting GDPR Art. 17) allows a data subject (including a minor) to request deletion of personal data when there is no legal basis to keep it. Thus, a victim can ask the platform (as data controller) to delete explicit images of them under data protection law:



**Article 56 – Right to Rectification or Erasure of Personal Data and Restrictions on Processing (Article 17 of the Directive) (Unofficial English Translation)**

1. The data subject has the right to request from the controller the rectification without delay of inaccurate personal data concerning them. In particular, in the case of statements or decisions, the issue of accuracy is irrelevant to the content of the statement or decision. If the accuracy or inaccuracy of the personal data cannot be verified, the controller shall restrict processing instead of erasing the data. In such cases, the controller shall inform the data subject before lifting the restriction. The data subject may also request the completion of incomplete personal data, if this is reasonable in view of the purposes of the processing.
2. The data subject has the right to request from the controller the erasure of personal data concerning them without delay, where the processing violates the provisions of this Chapter, the data are no longer necessary for the performance of duties, or the data must be erased in order for the controller to comply with a legal obligation.

However, beyond the aforementioned mechanisms, Greek law does not provide a new civil remedy requiring the Online Platform to take down content.

**b. An obligation on the part of the Online Platform to take active steps to remove the pornography or other imagery from their servers?**

Other than as described in question 5, there is no additional statutory obligation on platforms beyond compliance with removal orders under the laws noted. Online Platforms must follow public prosecutors' orders, but there is no separate self-executing duty in Greek civil law; removal is achieved via the criminal/judicial processes described above in question 5.a.

**c. An ability to get an injunction or other court order against the Online Platform to stop them from publishing the pornography or imagery?**

Pursuant to the Greek Code of Civil Procedure, it is possible to seek injunctive relief against an Online Platform to prevent the publication or continued dissemination of unlawful content, including pornography or imagery that violates legal rights.

The court may issue a temporary injunction to protect victims. This procedure is governed by interim measures, specifically: Article 682 et seq. of the Greek Code of Civil Procedure, which allows Greek courts to order interim measures to secure or preserve a right or to regulate a situation in urgent cases or to avert imminent danger, and additionally, Article 691A provides for the issuance of a temporary order, which may be granted even before the hearing of the application for interim measures, offering immediate protection.

The aforementioned Articles may be used to prohibit the publication of pornographic material by the online platform:

**Article 682 – Interim Measures (Unofficial English Translation)**

1. Under the special procedure governed by Articles 683 to 703, the courts may, in urgent cases or in order to avert imminent danger, order interim measures to secure or preserve a right or to regulate a situation. The court may also amend or revoke such measures. The right in question may be subject to a condition or time limit, or



- may concern a future claim.
2. Interim measures may also be ordered during the proceedings concerning the principal action.

Pursuant to the above cited Articles the court may temporarily order measures to safeguard rights – for example, ordering a platform to cease publishing specific content – until a final decision is reached. Such interim orders are recorded either on the application or in the hearing minutes. The hearing on the request must be held within two days; if not, the injunction automatically lapses. In practice, a victim can petition the court under Articles 682, 686 and 688, to quickly restrain the platform from republishing CSAM, pending the outcome of the main proceedings.

**d. A protective order or other court order that prohibits the person who posts the pornography or imagery from doing so in the future on the same or other Online Platform?**

Under Greek law, a person whose right to personality has been unlawfully infringed—such as through the publication of pornographic or non-consensual imagery—has the right to seek judicial protection to both terminate the violation and prevent its recurrence.

This right is established under Article 57 of the Greek Civil Code, which provides that (Unofficial English Translation):

*"Anyone whose personality is unlawfully infringed may demand the cessation of the infringement and its non-repetition in the future."*

This includes the ability to request a court order prohibiting the infringing party from reposting or redistributing the material, whether on the same or other online platforms.

These remedies may be pursued either independently or in conjunction with a main action for damages under the law of torts, as explicitly permitted by Article 57 in conjunction with Article 914 et seq. of the Greek Civil Code.

Furthermore, according to the Greek Code of Civil Procedure, the interim measures procedure serves to protect the victim prior to the main trial against the perpetrator of a crime. Article 682 of the Greek Code of Civil Procedure (special procedure) allows courts to order urgent interim measures to preserve rights or prevent imminent harm. Under this procedure, a court may order various precautions, potentially including directing an offender not to distribute content or barring them from certain activities pending trial. These measures can be issued *ex parte* if necessary and later confirmed at a hearing. In summary, while there is no specific "no-post" protective order in statute, the courts can impose such restrictions via Article 682 interim relief to protect the victim from further dissemination. Therefore, a minor victim of child pornography may be protected through this mechanism, so that the pornographic content or images of child sexual abuse are not published by the online platform:

**Article 682** (Unofficial English Translation)

1. Under the special procedure set out in Articles 683 to 703, courts may, in urgent cases or to prevent imminent danger, order interim measures to safeguard or preserve a right or to regulate a situation. These measures may be modified or revoked. The right in question may be subject to a condition or time limit, or may

- concern a future claim.
2. Interim measures may also be ordered during the proceedings concerning the main case.
- e. the ability to seek financial damages or any sort of monetary recovery from an offender who has shared the child's image or video, either in a civil or a criminal proceeding?**

Under Greek law, the unlawful dissemination of a child's image or video may give rise to civil claims for monetary compensation, as well as participation in criminal proceedings to support prosecution.

In the civil context, the injured party may pursue moral damages under Article 59 of the Greek Civil Code, as a consequence of the violation of right to personality protected by Article 57 (cited above), which entitles the victim to demand cessation of the infringement and its non-repetition, and compensation for pecuniary and non-pecuniary loss under Articles 914 and 919 of the Greek Civil Code, which govern liability for torts, including intentional or negligent acts that cause harm.

These provisions allow the victim (or their legal representatives) to initiate a main civil action seeking financial redress for the harm suffered.

In the criminal context, Greek law permits victims to claim compensation from perpetrators. Under Article 63 of the Code of Criminal Procedure, victims (or their representatives) may join the criminal proceedings as civil claimants to seek damages for harm caused by the crime. A minor or their legal guardian can bring such a civil action for restitution or moral damages at any stage of the criminal trial (after paying a small court fee). The criminal court then determines compensation as part of its judgment.

#### **Article 63 – Code of Criminal Procedure - Legal Standing (Active Legitimation) (Unofficial English Translation)**

Persons entitled under the Greek Civil Code to claim compensation or restitution for harm caused by a criminal offense, or to claim monetary satisfaction for moral damage or emotional distress—even in cases where, by virtue of a legal provision, the obligation to provide restitution or satisfaction is limited exclusively to a third party—may appear before the criminal court to support the prosecution. The fee for such appearance, under penalty of inadmissibility, is set at 40 euros, payable once via a public revenue stamp either during the preliminary investigation or the main proceedings. This fee covers the appearance until the issuance of a final decision. The amount of the above fee may be adjusted by joint decision of the Ministers of Finance and Justice, Transparency and Human Rights Persons entitled to legal aid, as defined in Article 1 of Law 3226/2004, are exempt from the obligation to pay the fee.

Additionally, Law 4216/2013 (transposing the EU Victims' Directive) ensures victims have rights to legal aid and compensation. Article 15 of that law guarantees victims' access to information and remedies and affirms their right to be compensated by offenders. While Art.15 mainly addresses trafficking victims, it reflects the general principle that perpetrators must compensate victims. Thus, both during criminal trials and potentially in separate civil suits, children can obtain monetary damages from offenders.



**Article 15 – Compensation and Legal Remedies (Unofficial English Translation)**

1. Each Party shall ensure that victims have access, from their first contact with the competent authorities, to information regarding relevant judicial and administrative procedures, in a language they can understand.
2. Each Party shall provide for the right of victims to legal assistance and free legal aid, under the conditions established by its national legislation.
3. Each Party shall provide in its national legislation for the right of victims to be compensated by the perpetrators of trafficking in human beings.
4. Each Party shall take the necessary legislative or other measures to ensure that victims are compensated, in accordance with the conditions provided by its national legislation, for example through the establishment of a compensation fund for victims or through measures or programs for social assistance and social integration of victims, which may be financed from the proceeds derived from the implementation of the measures provided for in Article 23.

**f. the ability to seek any other forms of victim compensation/recovery/services provided for under the law and/or by a government-funded source?**

For victims of intentional violent crimes— including severe sexual offenses —Law 3811/2009 (Article 3) provides for the possibility of compensation from the Greek State, provided specific conditions are met. This compensation covers expenses, such as medical and psychological care, lost income, relocation costs, etc. Compensation is available when the offender has no means or cannot be identified (usually after a final conviction or case closure) (Article 8 of Law 3811/2009). In short, a child victim can apply to the national victims' compensation scheme for financial relief for injuries and other losses related to the crime.

**Article 3 – Liability for Compensation (Unofficial English Translation)**

1. Victims of intentional violent crimes committed within the territory of Greece, who reside or habitually live either in Greece or in the territory of another European Union Member State, are entitled, upon application, to reasonable and appropriate compensation from the Greek State.
2. The right to compensation arises: a) when the perpetrator of the crime lacks the necessary financial means, from the issuance of a final and irrevocable conviction, b) when the identity of the perpetrator cannot be established, from the filing of the case in the archive of unknown perpetrators, c) when the perpetrator cannot be prosecuted or sentenced, from the filing of the case in the archive by order of the competent public prosecutor, or from the issuance of a final and irrevocable acquittal or dismissal, or from any other form of definitive closure of the case.
3. In cases (a) and (c) above, a prerequisite for submitting a compensation claim is the victim's inability to satisfy their claim against the perpetrator by any means, as determined by a final judicial decision.
4. For the purposes of this law, a violent crime is defined as: a) any intentional criminal act committed through the use of physical violence or the threat of physical violence, resulting in the death or serious physical or mental injury of the victim, b) any intentional criminal act committed through the use of physical violence or the threat of physical violence and punishable by imprisonment.

**g. notification to a victim when an offender is arrested for distributing child pornography or CSAM in which the child is depicted?**



Greek law contains no specific requirement that a victim must be notified upon an offender's arrest in such cases. There is no statutory provision obliging law enforcement to inform victims of arrests or prosecutions. Any such notification would be a matter of police or prosecutorial practice (or EU Victims' Directive obligations generally to inform victims), but it is not mandated by Greek law.

**Citations:**

- General Data Protection Regulation (Regulation (EU) 2016/679): <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>
- Digital Services Act, (Regulation (EU) 2022/2065): <http://data.europa.eu/eli/reg/2022/2065/oj>
- Greek Law 4954/2022, Government Gazette 136/A/09.07.2022, "Supplementary Measures for the Implementation of Regulation (EU) 2019/788 on the European Citizens' Initiative and Implementing Regulation (EU) 2019/1799";: <https://search.et.gr/el/fek/?fekId=767085>
- Greek Law 4070/2012, Government Gazette 82/A/10.04.2012, "Regulations on Electronic Communications, Transport, Public Works and Other Provisions": <https://search.et.gr/el/fek/?fekId=473837>
- Greece, Ministry of Citizen Protection, Hellenic Police, "Operation and responsibilities of the departments of the Cybercrime Prosecution Directorate", online: <https://www.astynomia.gr/2015/06/05/leitourgia-kai-armodiotites-ton-tmimaton-tis-dieftnhsis-dioxis-ilektronikou-egklimatos/>
- Greek Law 4624/2019, Government Gazette 137/A/29.8.2019, "Hellenic Data Protection Authority, Implementation Measures of Regulation (EU) 2016/679 and Incorporation of Directive (EU) 2016/680": <https://www.lawspot.gr/nomikes-plirofories/nomothesia/nomos-4624-2019>
- Greek Code of Civil Procedure: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/kodikas-politikis-dikonomias>
- Greek Code of Civil Procedure, Article 682: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/kpold/arthro-682-kodikas-politikis-dikonomias>
- Greek Civil Code: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/astikos-kodikas>
- Law 3226/2004, Government Gazette 24/A/04.02.2004, "Provision of legal aid to low-income individuals and other provisions": <https://www.lawspot.gr/nomikes-plirofories/nomothesia/nomos-3226-2004>
- Article 63 of the Greek Code of Criminal Procedure: <https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4620-2019/arthro-63-kodikas-poinikis-dikonomias-nomos-4620-2019>
- Law 4216/2013, Government Gazette 266/A/10.12.2013, "Ratification of the Council of Europe Convention on Action against Human Trafficking": <https://search.et.gr/el/fek/?fekId=490503>
- Law 3811/2009, Government Gazette 231/A/18.12.2009, "Compensation of Victims of Intentional Violent Crimes and Other Provisions": <https://www.lawspot.gr/nomikes-plirofories/nomothesia/nomos-3811-2009>

6. "Safety by Design" is defined as tools or processes that are built into an Online Platform to protect children by making it easier for the relevant Online Platform to detect or prevent the distribution of child pornography or CSAM.

**a. Are Online Platforms legally required to incorporate “Safety by Design” into their systems?**

Although there is currently no specific Greek legislative provision mandating the implementation of "Safety by Design" measures specifically for the detection of CSAM or child pornography, compliance with the applicable European regulations — namely the Digital Services Act (DSA) and the General Data Protection Regulation (GDPR), and Directive (EU) 2016/680 — is required. Please refer to the EU questionnaire for more information on EU-wide legislation. There are no notable deviations from the DSA in this respect in Greece.

- i. If so, must these steps be taken before the launch of an Online Platform?**
- ii. If so, if an Online Platform has already been in public use, when must they have incorporated “Safety by Design” measures?**
- iii. For each of 6(a)(i) or (ii) above, please describe the legal requirement or recommendation.**

**b. Please include information about the parameters for monitoring, management, and enforcement of any legal or regulatory requirements for the Online Platform’s incorporation of “Safety by Design”?**

This issue is regulated at the EU level under the DSA and the GDPR. Please refer to the EU questionnaire for more information on EU-wide legislation. There are no notable deviations from the DSA or the GDPR in this respect in Greece.

**Citations:**

- Digital Services Act, (Regulation (EU) 2022/2065): <http://data.europa.eu/eli/reg/2022/2065/oj>
- General Data Protection Regulation (Regulation (EU) 2016/679): <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>
- Law 5099/2024, Government Gazette 48/A/05.04.2024, “Measures for the Implementation of Regulation (EU) 2022/2065 on the Digital Services Act and Amendment of Directive 2000/31/EC”: <https://www.lawspot.gr/nomika-nea/praxi-gia-tis-psifiakes-ypiresies-digital-services-act-dimosieythike-o-nomos-5099-2024>