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New institutional supervisory architecture

New national framework for the implementation of the AI Act in Greece

The newly published law 5321/2026 establishes the national framework for the implementation of **Regulation (EU) 2024/1689** on Artificial Intelligence (AI Act). The law aims to ensure a high level of protection of health, safety and fundamental rights and also to create conditions promoting innovation and responsible development of AI systems in Greece.

The main provisions of the law are summarized as below:

A key point of the new law is the determination of the national authorities supervising and implementing the AI Act.

The **Hellenic Data Protection Authority (HDPa)** is designated as the main market surveillance authority for issues related to:

- prohibited AI practices;
- high-risk AI systems listed in Annex III;
- transparency obligations.

In parallel, the HDPa assumes the role of the single point of contact for communication with the European Commission and the EU AI governance framework.

The **Hellenic Telecommunications & Post Commission (HTPC)** is designated as the notifying authority, while at the same time it takes over the operation of the Coordination and Know-how Centre for AI, with the responsibility of providing support, training and technical guidance to the competent authorities.

Regulatory sandboxes for supporting innovation

In the context of strengthening technological development and responsible innovation, the establishment of an AI regulatory sandbox is foreseen, under the supervision of HTPC and HDPA.

The sandbox will provide a controlled environment for the development and testing of AI systems, **in particular high-risk**, with the aim of practically assessing their functioning under supervised conditions.

In addition, the **possibility of testing in real-world conditions outside the regulatory sandbox** is introduced, subject **to prior express written permission** from the competent authority. This provision enhances the flexibility of the framework, while attempting to ensure the necessary compliance and safety.

Central Register of AI Systems for the Public Sector

It is worth noting that the law introduces an obligation to register AI systems used by public sector bodies in a **single Central Register of AI Systems**.

Every public sector body must declare each AI system it intends to use, providing information on, inter alia, on:

- the purpose of use of the system;
- its technical characteristics;
- the data it processes;
- risk assessment.

This provision substantially enhances transparency, accountability and traceability in the use of AI by public bodies and is expected to be a key oversight and control tool.

Content transparency and strict approach regarding deepfakes

The new framework establishes strict transparency obligations for AI-generated or modified content, explicitly prohibiting the removal of relevant label, including those related to *deepfakes*.

Violation of this prohibition is dealt particularly strictly, as in addition to administrative fines, it can also result in criminal sanctions, such as imprisonment and a fine.

Supervisory measures, sanctions and judicial protection

The law provides competent authorities with a wide range of tools to enforce compliance.

The measures envisaged include:

- warnings,
- compliance orders;
- reprimands,
- administrative fines.

It is worth noting that the law sets that sanctioning decisions should be published on the websites of the competent authorities, with reference to the nature of the infringement and the identity of the offender. At the same time, the law provides for the power of authorities to charge the audited organization with the costs of investigation in case of detected non compliance.

The abovementioned individual administrative acts and sanctions can be challenged through an application for annulment before the Conseil d'Etat.

Transition period and immediate compliance actions

The law includes transitional arrangements for public sector bodies, that already use AI systems. These are required to complete the submission of the relevant declaration to the Registry **by December 31, 2026**.

This deadline calls for timely action, in particular on:

- mapping of existing AI systems;
- the assessment of their functioning and risk profile;
- the collection and organization of the required documentation,
- strengthening of internal AI governance mechanisms.

The new framework is not limited to theoretical regulation, but creates specific organisational and operational compliance requirements.

Key takeaways

- The new national implementation framework of the AI Act marks an essential step for the institutional integration of Artificial Intelligence rules in Greece.
- The establishment of competent supervisory authorities, the provision of regulatory sandboxes, the creation of a Registry of AI Systems and the introduction of administrative and criminal sanctions reflect the legislator's intention to balance innovation with regulatory compliance and accountability.
- For public sector bodies, in particular, the new framework entails immediate obligations and intensifies the need to prepare in time in view of the registration deadline expiring by the end of 2026.

Let's talk

For a more detailed discussion regarding the above issue, please contact:



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