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Greece Introduces National Framework for the EU AI Act

Greek Law 5321/2026 has been published in the Government Gazette, establishing the national framework for the implementation of the **EU AI Act (Regulation (EU) 2024/1689)** and amending the earlier AI governance provisions of Law 4961/2022. The new legislation aims to ensure the effective application of the EU AI Act at national level while balancing the protection of fundamental rights, transparency, accountability and innovation.



It designates the competent authorities responsible for market surveillance, introduces mechanisms for regulatory coordination, creates a regulatory sandbox for AI innovation, and establishes new obligations for public sector bodies using AI systems. Businesses developing, deploying or using AI systems should assess their compliance frameworks, governance policies, transparency measures and AI literacy programmes in light of both the EU AI Act and the new Greek implementing legislation.

Key Highlights

1. HDPDA designated as the principal AI regulator: The **Hellenic Data Protection Authority (HDPDA)** has been designated as the market surveillance authority for prohibited AI practices, high-risk AI systems under Annex III of the AI Act, and AI systems subject to transparency obligations. It also serves as Greece's single point of contact with the European Commission and the EU AI Office, operates a centralised AI complaints mechanism, and acts as the notified body for conformity assessments of certain high-risk AI systems used in law enforcement, migration, and asylum.

2. New AI governance structures: The law also establishes new AI governance structures, including an **AI Coordination and Expertise Centre** within the Hellenic Telecommunications



and Post Commission (EETT) to support supervisory authorities and provide technical support, guidance and training, facilitate the development of AI codes of conduct, and promote innovation, particularly for SMEs and start-ups. It further introduces a **national AI Regulatory Sandbox**, jointly operated by the HDPa and EETT, to support the testing and development of innovative AI systems, while strengthening cooperation between supervisory authorities and other innovation actors, including the **Pharos AI Factory**, the **Hellenic Center for Defence Innovation (ELKAK)**, and the **European Digital Innovation Hubs (EDIHs)**.

3. Enforcement and sanctions: Competent authorities are empowered to issue warnings and compliance orders, impose administrative sanctions and fines in accordance with the AI Act, publish enforcement decisions, and recover investigation and supervision costs from non-compliant operators. The law also extends the protections of Greece's whistleblower framework (Law 4990/2022) to individuals reporting infringements of AI legislation.

4. Public sector AI registry: A **National Registry of Artificial Intelligence Systems** is established within the Ministry of Digital Governance. Public sector entities using AI systems will be required to register them and provide information regarding their purpose and functionality, the categories of data used or generated, their technical characteristics and operating parameters, applicable risk assessments and mitigation measures, the system's classification under the EU AI Act, any required fundamental rights impact assessments, and, where applicable, data protection impact assessments. An **Artificial Intelligence Observatory** is also created to monitor AI deployment and support the implementation of Greece's national AI strategy. Public authorities already using AI systems will be required to register them no later than 31 December 2026.

5. Deepfakes and transparency: The law introduces specific provisions aimed at protecting transparency in AI-generated content. The removal or manipulation of mandatory disclosures or labels identifying **AI-generated or AI-manipulated content (deepfakes)** may result in criminal sanctions, reinforcing the transparency requirements of Article 50 of the AI Act.



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