KARATZAS & PARTNERS

Data Protection, AI & Cybersecurity

Brief

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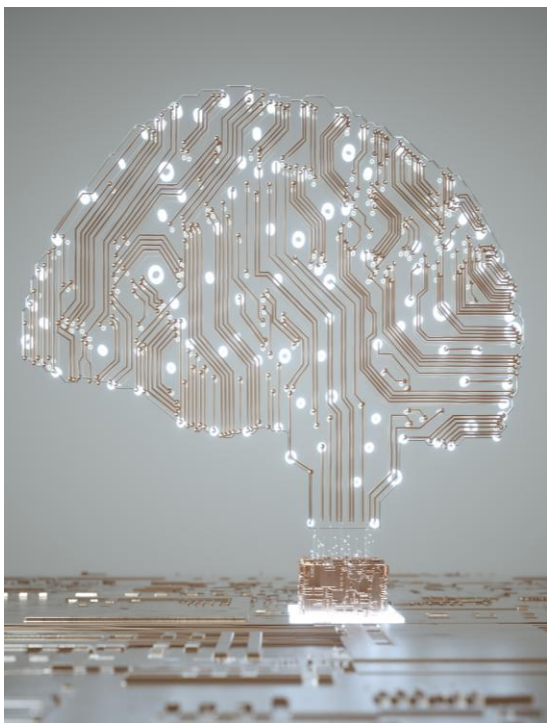
Greece Adopts National Law Implementing the EU AI Act

Greece has enacted its national AI Act implementation framework through Law 5321/2026, titled “Measures for the Implementation of Regulation (EU) 2024/1689 on Artificial Intelligence (AI Act) – Amendment of Law 4961/2022 and other provisions.” Published in July 2026, the law establishes the national governance structure for the application and enforcement of the EU AI Act.

Key elements include the designation of the HDPA as the market surveillance authority for prohibited AI systems, high-risk AI systems listed in Annex III of the AI Act, and AI systems subject to transparency obligations, as well as national single point of contact under the AI Act, the establishment of an AI Regulatory Sandbox and the establishment of an AI Coordination and Expertise Center within the Hellenic Telecommunications and Post Commission (EETT).

Why it matters: The adoption of Law 5321/2026 marks a significant milestone in Greece's AI regulatory landscape, providing legal certainty for organizations developing or deploying AI systems and reinforcing the principles of transparency, accountability, safety, and trustworthy AI in line with the EU AI Act.



EDPB Sheds Light on Anonymisation and Web Scraping for Generative AI and adopts final version of guidelines on blockchain

On **8 July 2026**, the European Data Protection Board (EDPB) adopted guidelines on anonymisation and guidelines on web scraping in the context of generative AI. The anonymisation guidelines establish a three-criteria test for determining when personal data has been properly anonymised under the GDPR (no record isolation, no linkage, and no inference). The web scraping guidelines address the GDPR's application to web scraping for generative AI training, including the legal basis for such activities and the conditions under which special categories of data can be processed in this context, as well as the purpose limitation and transparency principles.

The EDPB also adopted the final version of its guidelines on blockchain technologies.

Why it matters: These guidelines reinforce that GDPR compliance must be built into system design through data minimisation, transparency, risk assessments, and effective safeguards for data subjects' rights.

The guidance also highlights growing regulatory scrutiny of web scraping, the limits of blockchain immutability when personal data is involved, and the need for robust, evidence-based anonymisation. For businesses, these developments raise the compliance bar and make early privacy-by-design decisions increasingly important.

Commission Preliminarily Finds the Addictive Design of Instagram and Facebook in Breach of the Digital Services Act

On 10 July 2026, the European Commission preliminarily found Meta in breach of the Digital Services Act (DSA) for the addictive design of Instagram and Facebook. The investigation focuses on features such as infinite scroll, autoplay, push notifications, and the platforms' highly personalised recommender systems. The Commission found that Meta did not adequately assess the risks of its addictive design on the physical and mental wellbeing of users, including minors and vulnerable adults.

Meta's current mitigation measures, including time management tools and parental controls, were found insufficient. The Commission considers that Meta needs to implement design changes, such as disabling autoplay and infinite scroll by default, implementing effective screen time breaks, and adapting its recommender system to make it less engagement oriented. Meta now has the possibility to exercise its right to defence and it can reply in writing to the Commission's preliminary findings.

In parallel, the European Board for Digital Services will be consulted.

Why it matters: The preliminary finding signals the Commission's determination to enforce the DSA's systemic risk obligations against major platforms. If confirmed, it could lead to fines capped at 6% of the total worldwide annual turnover of the provider and would require fundamental redesign of core platform features. Organisations operating online platforms should review their own risk assessment and mitigation practices in light of this enforcement precedent, particularly regarding addictive design patterns and the protection of minors.

HDPA Issues Three Advisory Opinions on Draft Legislation

The HDPA recently issued three advisory opinions on draft legislation:

(1) Opinion 6/2026 on a draft provision by the Ministry of Digital Governance and Artificial Intelligence concerning the Unified Digital Payments Gateway ("Ενιαία Ψηφιακή Πύλη Πληρωμών").

(2) Opinion 7/2026 on a draft Joint Ministerial Decision by the Ministry of Education, Religion and Sports concerning the establishment of the framework for the licensing of places of worship and matters concerning religious ministers of recognized religions.

(3) Opinion 8/2026 on a draft provision titled "Supporting the audit work of the National Transparency Authority through the use of an artificial intelligence system".

Why it matters: These opinions demonstrate the HDPA's proactive engagement with legislative and regulatory initiatives involving the processing of personal data. Covering areas such as digital governance, religious affairs, and public accountability, they illustrate the growing integration of data protection requirements into emerging regulatory and technological initiatives in Greece.

HDPA Decision 8/2026: HDPA Fines Energy Provider and Bank for GDPR Violations

In HDPA Decision 8/2026, the HDPA examined two complaints by the same individual against an energy provider and a bank concerning the violation of the right of access under Article 15 GDPR. The dispute involved standing orders for three electricity accounts, two of which the complainant denied authorising.

The HDPA found that errors by the energy provider's data processor led to inaccurate records of the complainant's preferences, while supporting documents were not retained in line with the applicable retention policy. As a result, standing orders were set up for two additional accounts beyond the one authorised by the complainant.

The energy provider failed to respond with sufficient clarity and completeness to the access request. The HDPA found violations of the accuracy principle, in conjunction with its obligations related to the right of access and processor obligations, imposing administrative fines on both the energy provider (100.000€) and the bank (10.000€).

Why it matters: This decision underscores the importance of maintaining accurate personal data and responding promptly and completely to data subject access requests. It also highlights the obligations of data controllers when engaging data processors. Organisations should review their data processor agreements and ensure that supporting records are preserved in line with their retention policies.

HDPA Decision 10/2026: HDPA Fines Two Companies for CCTV-Related GDPR Violations

In Decision 10/2026, the HDPA examined complaints against an exhibition centre operator and a retail supermarket chain concerning the unlawful processing of personal data through CCTV systems, the disclosure of CCTV footage to third parties without prior notification to the data subject, and the failure to adequately satisfy the right of access under Article 15 GDPR.

The HDPA found that both companies obstructed the exercise of the complainant's right of access by requesting clarifications instead of responding substantively. Both had also disclosed CCTV footage, including images of the complainant's vehicle, to judicial authorities without informing the data subject and without a proper legal basis for this further processing. The Authority identified violations of the principles of lawfulness, transparency, the right of access, and additional breaches including failure to communicate DPO contact details and failure to cooperate with the supervisory authority.

Administrative fines of a total of 160.000€ were imposed on the two companies.

Why it matters: The decision reinforces that any disclosure of CCTV data for purposes beyond those originally communicated to data subjects, such as use in legal proceedings, requires prior notification. Organisations operating CCTV systems should ensure their information notices comply with Articles 12 and 13 GDPR, including second-layer notices, and should implement procedures to respond promptly and fully to data access requests.

Modernised EU Design Legal Framework Fully Applicable from 1 July 2026

As of 1 July 2026, the new EU design legal framework is fully applicable and operational, marking the completion of a significant comprehensive reform of the EU design protection regime. The reform, delivered through the new codified European Union Design Regulation (EUDR), the new delegated regulation (EUDDR) and the new implementing regulation (EUDIR), introduces significant changes:

(a) Modern design representation: protection may now be obtained through dynamic 3D representations and animated representations, and up to 10 static views may be submitted.

(b) Streamlined filing: all communication is 100% electronic, filing date requirements have been simplified, and the unity of class requirement for multiple applications has been abolished.

(c) Stronger exclusive rights: design protection now explicitly extends to 3D printing, covering the creation, copying, and distribution of infringing 3D-printed products.

(d) New limitations: acts carried out for purposes of comment, critique, and parody are now expressly permitted; a harmonised EU-wide repair clause confirms that parts used solely to restore a product's original appearance are excluded from design protection.

(e) The new Ⓓ design registration symbol may now be used by registered EU design holders.

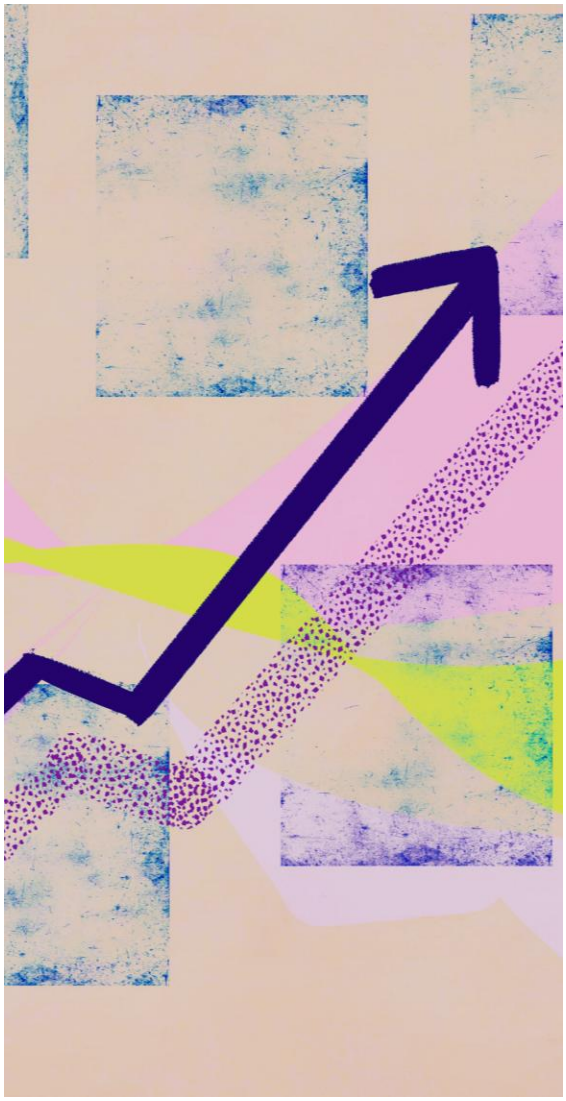
Why it matters: The reform modernises the EU design protection system, making it better suited to the digital era. Design owners, IP practitioners, and businesses involved in product development, 3D printing, and digital interfaces should familiarise themselves with the new framework.

EU Trademarks Push IP Filings to a Record High in the First Half of 2026

On **7 July 2026**, the European Union Intellectual Property Office (EUIPO) reported that IP filings reached record levels in the first half of 2026, with total EU trademark and EU design applications reaching 166,214; up 4.7% on the same period in 2025.

The milestone reflects growing demand for IP protection across the EU single market. The increase was driven primarily by EU trademark applications, indicating continued confidence in the EU IP system and the strategic importance businesses place on brand protection.

Why it matters: The record filing levels underscore the increasing importance of intellectual property as a competitive tool for businesses operating in the EU. Companies and brand owners should consider reviewing and strengthening their IP portfolios to ensure comprehensive protection.



KARATZAS & PARTNERS

About Us

Dimitra Karampela, Senior Associate
d.karampela@karatza-partners.gr

Panagiotis Kontizas, Associate
p.kontizas@karatza-partners.gr

Georgia Patiri, Associate
g.patiri@karatza-partners.gr

Contact Us

The Orbit-5th floor, 115 Kifissias Ave.11524 Athens, Greece

+30 210 371 3600

mail@karatza-partners.gr

dataprotection@karatza-partners.gr