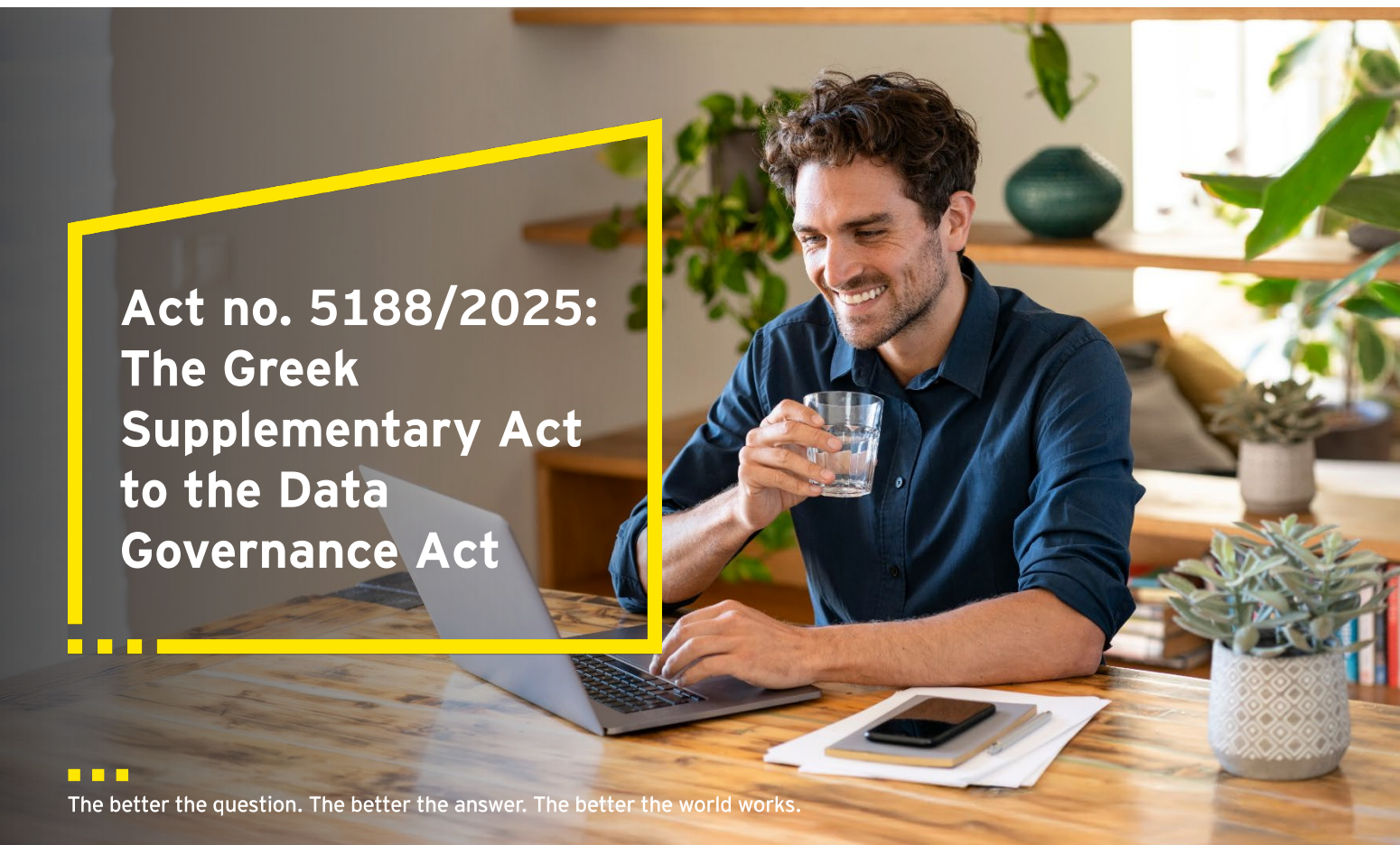




## Platis - Anastassiadis & Associates

The associate law firm of EY Greece



### Act no. 5188/2025: The Greek Supplementary Act to the Data Governance Act

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The better the question. The better the answer. The better the world works.

Articles 1-16 of the Act no. 5188/2025 (Government Gazette 49/A/28-03-2025) establish the measures for the implementation of the Data Governance Act. The new Act sets out the regulatory framework for the re-use of public sector information, designates the competent authorities for data intermediation services and data altruism organisations, and provides for relevant sanctions in case of violation of the Act.

Articles 1 to 16 of Act no. 5188/2025 introduce measures for the implementation of Regulation (EU) 2022/868 ("Data Governance Act" or the "Act") into the Greek legal order (the "Act").

The purpose of the new Act is to establish an effective data governance framework for data held by public sector bodies, to facilitate access to and the sharing of such data, to enhance trust in the voluntary exchange of data for the benefit of businesses and citizens, and to improve the national framework and institutions for the governance of public sector information.

Within this context, the new Act provides for the

following implementation measures of the Act:

- It establishes the regulatory framework governing the re-use of protected public sector information.
- It designates the competent supervisory authority for data intermediation service providers and data altruism organisations.
- It sets out the powers and enforcement competences of the supervisory authority, as well as the legal remedies available to affected individuals.
- It lays down the framework for the adoption and implementation of a national data strategy.

## 1. The Data Governance Act

The Data Governance Act establishes the framework and sets out the conditions for the re-use of data held by public sector bodies that are legally protected, particularly as personal data or data protected by intellectual property rights ("protected data"), by regulating the applicable procedure through a single information point.

Furthermore, the Act provides for the establishment of data intermediation services and data altruism organisations, in order to support and facilitate the provision of data by the data subject or holder (data sharing).

## 2. Provisions on the re-use of Protected public sector information

The Act no. 5188/2025 introduces the following provisions regarding the re-use of protected data held by public sector bodies:

- It establishes the principle of "open access by design and by default", under which public sector bodies are required to create and make their data available in formats and structures that facilitate anonymisation (Article 3).
- It designates the Ministry of Digital Governance as the competent authority to assist public sector bodies that grant or deny access to data for re-use (Article 5).
- It designates the Ministry of Digital Governance as the single information point for the Data Governance Act (Article 6).

Decisions by public sector bodies on requests for access to data for re-use are subject to judicial review before the territorially competent Administrative Court of Appeal (Article 7).

## 3. Provisions on Data Intermediation Services

The Act no. 5188/2025 designates the Ministry of Digital Governance as the competent supervisory authority for data intermediation service providers and data altruism organisations (Articles 8-9).

In case of non-compliance with the provisions of the Data Governance Act, the Ministry of Digital Governance, following a prior hearing, may impose administrative fines ranging from €10,000 to €100,000 (Article 12).

Decisions imposing fines may be challenged through an appeal on the merits before the competent Administrative Court of Appeal.

## 4. Data Use Officer

For the implementation of the Act, the Act introduces the newly established role of the Data Use Officer (DUO), who is appointed at every central government body.

The Data Use Officer must explicitly be a different individual from the Data Protection Officer and the Information and Communication Systems Security Officer.

## 5. National Data Strategy

The Ministry of Digital Governance drafts and updates the National Strategy for public sector information, which determines the core principles, framework, and guidelines for the access and re-use of public sector information, as well as the specific principles governing each horizontal or sectoral initiative serving this purpose.

The National Strategy has a five-year duration and is binding upon all relevant public sector bodies.

A Coordinating Committee for public sector information is established within the Ministry of Digital Governance, serving as the coordinating body for public data management issues.

The Coordinating Committee may set up working groups to address specific topics, which may also include external experts. These working groups submit reports and recommendations to the Committee.

## 6. Significance

The value of the data economy in the European Union is expected to increase from three hundred and one billion euros (€301,000,000,000) in 2018 to eight hundred and twenty-nine billion euros (€829,000,000,000) by the end of 2025.

The Act no. 5188/2025 forms part of an emerging body of a holistic data law, applied in line with the provisions of Regulation (EU) 2016/679 ("GDPR").

The provisions of the new Act promote data sharing and facilitate the re-use of protected public sector information, thereby creating growth opportunities for the Greek data economy.

In the new regulatory environment introduced by the Act, technology enterprises are encouraged to capitalise on data-sharing opportunities and introduce innovative services for the benefit of the economy and society.

The Act no. 5188/2025 is available [here](#).

## About Platis - Anastassiadis & Associates

Platis - Anastassiadis & Associates is part of the EY Law network operating in 90 countries globally and is comprised of 3,500+ people.

We are an independent law office with a core team of 45 lawyers. Our office provides high quality legal services across the full range of commercial and financial transactions.

Especially in our geographical area, we have established an ongoing cooperation with the respective law firms which are associated with EY, in order to offer seamless and consistent regional services to our clients that have cross country operations.

Our experience allows us to better understand our clients' needs and offer them integrated multidisciplinary solutions in the fields of accounting, tax and financial advisory services. Platis -Anastassiadis & Associates law office is solution focused. We work closely with our clients to seek innovative and practical ways of dealing with their issues. Our priority is to help our clients meet their business objectives. Our expertise, commitment and enthusiasm has resulted in the build up of a client base which includes local and international listed, state and private sector companies and financial institutions.

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