



THIRD EDITION

Advertising Law: A Global Legal Perspective





Advertising Law: A Global Legal Perspective

THIRD EDITION

This publication provides general guidance only. It does not provide legal advice.
Please consult your attorney for legal advice.

©2024 Global Advertising Lawyers Alliance, Inc.

ABOUT GALA

The Global Advertising Lawyers Alliance (GALA) is the leading network of advertising lawyers in the world. With firms representing more than 90 countries, each member has the local expertise and experience in advertising, marketing and promotion law that will help your campaign achieve its objectives, and navigate the legal minefield successfully. GALA is a uniquely sensitive global resource whose members maintain frequent contact with each other to maximize the effectiveness of their collaborative efforts for their shared clients. GALA provides the premier worldwide resource to advertisers and agencies seeking solutions to problems involving the complex legal issues affecting today's marketplace.

For further information about GALA, please contact the relevant member directly or alternatively GALA's Executive Director, Stacy Bess at:

Global Advertising Lawyers Alliance

28 Liberty Street, 35th Floor, New York, NY 10005

Tel: 212.705.4895 | Fax: 347.438.2185

Email: sbess@galalaw.com

www.galalaw.com

 GREECE 

1 ADVERTISING FRAMEWORK

1.1 How is advertising regulated in Greece?

Advertising in Greece is regulated by both public law and industry self-regulation.

The main statutes on advertising law are the following:

- Consumer Protection Law (Law No 2251/1994) (which has transposed EU Directives on Consumer Protection into Greek law);
- Unfair Competition Law (Law No 146/1914), protecting competitors from illegal advertising;
- Audiovisual Media Law (Law No 4779/2021) (which has transposed the EU Audiovisual Media Services Directive into Greek Law);
- Laws on protection of personal data and e-privacy: namely, the EU General Data Protection Regulation ('GDPR') and Law No 4624/2019 implementing certain provisions of the GDPR and the e-Privacy Law (Law No 3471/2006) (which has transposed the EU e-Privacy Directive into Greek Law);
- IP Laws that impact upon comparative advertising: namely, the Copyright Law (Law No 2121/1993) and the Trademarks Law (Law No 4679/2020).

These primary statutes are supplemented by a great number of special provisions which regulate advertising of specific products and services (tobacco, alcohol, credit products, gambling etc).

Advertising self regulation has gained much importance in recent years. The main self-regulation organization in Greece is the Advertising Self-Regulation Council ('SEE') (see question 2.1 below).

1.2 What types of communications are considered to be 'advertising'? How is this determined?

A definition of 'advertising' is provided in the Consumer Protection Law, by which advertising means 'the making of a communication in any form in connection with a trade, business, craft or profession in order to promote the supply of goods or services, including immovable property, rights and obligations'.

1.3 What is the basic regulatory framework for advertising regulation?

In Greece, there is both a legal and a self-regulatory system. The latter is based on the Hellenic Code of Advertising and Communication Practice ('HCACP'), the structure and content of which is almost identical to the ICC Consolidated Code of Advertising and Communication Practice. The HCACP covers both non-broadcast and broadcast advertising, including online advertising and social media and it is enforced by the SEE. See question 2.2 below.

1.4 Are there certain types of advertising practices that are specifically regulated (eg, text message advertising)?

- (a) The Audiovisual Media Law sets out specific rules with regard to certain advertising practices such as telemarketing, sponsorship and product placement when offered in audiovisual media.

- (b) Direct marketing communications (through text messages, emails etc) are heavily regulated in Greece:
- (i) According to the e-Privacy Law, email/text message communications may only be allowed in respect of consumers who have given their express prior consent (opt-in system). All communications should provide an easy way to ‘unsubscribe’ from further emails/messages. As an exception to the above strict ‘opt-in’ rule, in cases where email addresses have been legally obtained in the context of a purchase of products or services to customers, the customers’ emails may be used for direct marketing of similar products or services, under certain conditions. Most importantly, in order for this ‘soft opt-in’ rule to apply, the customers need to be clearly informed (as per the GDPR) when their email is first collected about the trader’s intention to use it for marketing purposes and also the customers need to be clearly provided with a free and easy way to object (‘opt-out’) to receiving such marketing emails. The opt-out possibility needs to be provided both at the moment when the email address is first collected as well as within every marketing communication that will be sent.
- (ii) In relation to direct marketing through phone calls (telemarketing), there are also specific rules:
- For calls without human intervention (automated calls) it is necessary to have the express prior consent of the called persons (‘opt-in’ system).
 - For calls with human intervention, the ‘opt-out’ system applies, and advertisers should make sure that the called persons have not objected to receive such phone-calls. Consumers/phone subscribers may opt-out either by declaring to their phone provider that they wish to opt-out from all advertising /marketing calls in general, from any promoter (each Greek telecommunications provider holds an ‘opt-out registry’ for this purpose which they advertisers shall take into account) or by declaring directly to the calling advertiser that they do not wish to receive further promotional phone calls from them.
- In cases where direct marketing communications use harassment or involve persistent and undesirable communications with customers, they qualify as aggressive commercial practices and fall within the provisions of the Consumer Protection Law.
- (c) The advertising tool of promotional contests, which is excessively used in Greece, is subject to specific rules aiming to prevent misleading practices.

1.5 Are there certain industries whose advertising practices are specifically regulated (eg, drug advertising)?

- (a) **Alcohol:** Advertising of alcoholic beverages in audiovisual media and radio (including teleshopping) must not:
- be aimed specifically at minors;
 - depict minors consuming alcohol;
 - link the consumption of alcohol to enhanced physical performance or to driving;
 - create the impression that alcohol consumption contributes towards social or sexual success.

- imply that alcoholic beverages have therapeutic properties or that they act as stimulants, tranquilizers or sedatives,
- encourage immoderate consumption of alcoholic beverages or show abstinence from their consumption or their moderate consumption in a negative manner, or
- highlight the high alcohol content as a positive attribute of beverages.

In the field of self-regulation, the Hellenic Association of Drinks Distributors ('ENEAP') has voluntarily adopted similar commitments which apply across all media and can be found in the HCACP. The basic commitments are that alcohol advertisements should only be placed in media for which at least 70% of the audience is reasonably expected to be 18 years or older and that all alcohol advertisements should include the tag line 'enjoy responsibly'.

- (b) **Tobacco:** All forms of tobacco advertising (including e-cigarette advertising) are prohibited, except from advertisements inside tobacco stores.
- (c) **Medicines:** It is illegal to advertise medicines which are available on medical prescription only. Advertisements of over-the-counter medicines is, in principle, permitted, but certain restrictions apply—eg they must disseminate particular minimum information, along with the warning message: 'The Ministry of Health and the National Organization for Medicines advise you to read carefully the instructions and consult your doctor or pharmacist'.
- (d) **Food/Food supplements:** EU Regulation 1924/2006 on nutrition and health claims made on foods is applicable in Greece and introduces specific restrictions on the advertising, presentation and labelling of food and beverages (eg, that the advertisements concerned should not induce excessive consumption of food, that nutrition and health claims must be based on and substantiated by generally-accepted scientific evidence, etc). Furthermore, certain restrictions are also imposed on advertising nutritional supplements and food products intended for use in energy-restricted diets for weight reduction.
- (e) **Gambling:** Under Law No 4002/2011, the advertising of gambling services in Greece is permitted only to entities licensed by the Hellenic Gaming Commission ('HGC'). This Law and the Guidelines of HGC set out the general principle of responsible advertising along with a number of specific restrictions safeguarding a high level of consumer protection (eg, these advertisements should include a warning message on gambling harm, etc).
- (f) **Plant protection products (pesticides):** EU Regulation 1107/2009 concerning the placing of plant protection products on the market imposes certain rules and restrictions on the advertising of authorized pesticides. For example, all such advertisements should include the warning notice 'Use plant protection products safely. Always read the label and product information before use'.
- (g) **Cosmetics:** Advertising claims on cosmetic products must comply both with EU Regulation 655/2013 and with Annex VII of the HCACP which incorporates the 'Guiding Principles on Responsible Advertising and Marketing Communication' issued by Cosmetics Europe.

Professional Codes of Conduct, such as those of attorneys, doctors etc, also impose restrictions on advertising of the services of respected professionals.

1.6 Are any government pre-approvals required?

Pre-clearance of advertisements by the government or sector-specific government agencies is not obligatory in Greece, with some exceptions:

- (a) Advertising of over-the-counter medicines must be submitted to the Hellenic Organization for Medicines for monitoring before publication or broadcast.

- (b) Television advertisements for plant protection products (pesticides) must also be submitted to the competent Directorate of the Ministry of Agricultural Development and Food prior to broadcast.
- (c) Every commercial communication for gambling services must be submitted for prior approval to the Hellenic Gaming Commission.

In addition, advertising of specific products or services (eg, over the counter medicines, credit or financial products, investments etc) must contain pre-approved warning messages and/or particular information. For example, any advertisement of a credit agreement that indicates an interest rate must include information such as the total amount of credit, the annual percentage rate of charge etc.

1.7 Does the media pre-clear advertising?

The Greek media do not have a mechanism of pre-clearing advertisements. Advertisers/advertising agencies, before publication/broadcast of any advertisement may voluntarily seek the advice of the SEE, but this is not common practice in the Greek advertising market. The SEE only has an advisory function, and its pre-clearing opinions are not binding on the applicants, nor on the SEE itself. As a result, the SEE committee may later examine and even uphold a complaint filed by a third party (competitor/consumer) against the advertisement.

1.8 How does the government enforce advertising laws? What are the potential remedies?

The main government agencies which enforce advertising laws in Greece are as follows:

- (a) The Ministry of Economy and Development, through the General Secretariat for Consumers, is the state authority which imposes administrative sanctions on those who infringe the Consumer Protection Law. If the State authority intervenes, either *ex officio* or following a complaint, it may make a recommendation or impose a monetary fine ranging from €5,000 to €1,500,000. Sanctions may get stricter for repeat infringers.
- (b) The Greek National Council for Radio and Television ('NCRTV') is an independent administrative authority which monitors compliance with the specific regulations of advertising in audiovisual media, and is empowered to impose sanctions for infringement, such as making a recommendation or imposing monetary fines (for infringements by a TV channel, the fine ranges from €14,673 to €1,467,351; for radio stations, the fine ranges from €2,935 to €29,350; and for video sharing platforms the fine ranges from €1,000 to €500,000).
- (c) The Hellenic Organization for Medicines is the state authority which has jurisdiction over advertising of medicines/medical devices/nutritional supplements. It may penalize any illegal advertisement of medicines with a monetary fine up to €22,000.
- (d) The Ministry of Agricultural Development and Food, through the Hellenic Food Authority, may impose a fine ranging from €500–€30,000 for any violation of the legislation regarding advertising of food products.
- (e) The Hellenic Capital Market Commission intervenes if the marketing communications of investment firms disseminate misleading information to clients/potential clients. It has the authority to impose a fine up to €5 million.
- (f) The Hellenic Gaming Commission has the authority to impose fines ranging from €5,000–€200,000 for infringements of the legislation regarding the commercial communication of gambling services.

- (g) The Municipal and Regional Health Services, the Municipal Police, and the Coast Guard can impose fines ranging from €500–€10,000 for any infringement of the legislation regarding advertising of tobacco products.

In all these cases, the entity on which a sanction is imposed may file a petition to the body which has issued the decision or to the administrative courts asking for the annulment of the imposed sanction.

1.9 When does a competitor have a right of action? What are the potential remedies?

Competitors may challenge advertising by commencing court proceedings on the basis of the Unfair Competition Law, which prohibits any unfair act among competitors (including unfair advertising) and prohibits misleading statements in the course of competition.

With regard to the remedies available, the courts may:

- issue a cease-and-desist order; or
- award indemnity in case that monetary or moral damage have been caused (For the payment of indemnity, the plaintiff must prove that the infringement occurred by intention or negligence of the infringer; or
- order the publication of the court decision and the publication of a corrective advertisement or corrective declaration.

The main disadvantage of court proceedings is that they may last for a long period of time and usually entail significant costs. In cases of imminent danger, though, the plaintiff may apply for an injunction asking for preliminary measures.

As an alternative to the judicial route, competitors may file a complaint to the SEE (see question 2.3 below).

1.10 When do consumers have a right of action? What are the potential remedies?

In the case of unfair commercial practices, Greek consumer protection law permits any consumer and/or consumer association to request the Court to:

- issue a cease-and-desist order;
- award damages suffered by reason of that practice; and
- order the publication of the court decision.

In addition, consumers may demand, where relevant, a price reduction or the termination of the contract which was concluded as a result of the unfair commercial practice.

Consumer associations that have been registered in the consumer associations' registry for more than a year are entitled to file a class action for the protection of collective interests of consumers.

With regard to class actions, the remedies include:

- a provisional or definitive measure to cease or prohibit an illegal market practice; and
- a request that the consumers concerned are provided with compensation, repair, replacement, price reduction, contract termination or reimbursement of the price paid.

Consumers and/or consumer associations may also file a complaint to the SEE challenging an advertisement for violating HCACP (see question 2.3 below). The filing of a complaint to the SEE does not exclude the possibility of also taking legal action before court.

Finally, in cases of illegal commercial practices, consumers may address a complaint to the Hellenic Consumers' Ombudsman, which is an independent authority of extrajudicial dispute resolution in the area of consumer disputes.

2 SELF-REGULATORY FRAMEWORK

2.1 Does Greece have a primary advertising self-regulation system?

The national system of advertising self regulation is mainly handled by the SEE. The SEE is an independent non-profit association which was created in 2003 by the Hellenic Association of Advertising and Communication Agencies and the Hellenic Advertisers Association, which means that the major advertising agencies and advertisers are part of the self-regulatory system. The SEE is a member of the European Advertising Standards Alliance ('EASA').

SEE may be activated either after an ex officio monitoring or after submission of a written complaint. Both consumers and competitors are entitled to file complaints claiming that a marketing communication (printed or broadcast) breaches the Hellenic Code of Advertising and Communication Practice ('HCACP') (see question 2.2. below).

Charges are imposed on competitors (not consumers) for the examination of their complaints (filed before the SEE committee of first instance) and appeals (filed before the SEE committee of second instance).

SEE closely collaborates with the government agencies that enforce advertising laws (eg, the General Secretariat for Consumers and the Greek National Council for Radio and Television etc).

2.2 Is there a self-regulatory advertising code? What are the key principles?

The HCACP, in its current (2023) version, consists of the following parts:

- (a) The general principles of advertising practice, which apply to all marketing communications:
 - (i) The core principle of the Code is that marketing communication should be legal, decent, honest, truthful and socially responsible.
Other key principles are that:
 - (ii) marketing communications should be clearly distinguishable as such;
 - (iii) advertising claims relating to verifiable facts should be substantiated; and
 - (iv) marketing communications should not make unjustifiable use of the name, initials, logo and/or trademarks of another company.
- (b) Four detailed chapters, which mainly refer to certain advertising methods. More specifically, the Code covers:
 - sales promotion (Chapter A),
 - sponsorship (Chapter B),
 - direct marketing and digital marketing communications (Chapter C),
 - environmental claims in marketing communication (Chapter D).
- (c) Nine Annexes, six of which serve to regulate advertising of specific products (food, beer, other alcoholic drinks, tobacco, food supplements and cosmetics) and the other three relate to advertising directed to minors, green advertising and influencer marketing.

2.3 Does the system have an enforcement or dispute resolution mechanism? How does it work?

The SEE has introduced specific rules relating to the enforcement of the decisions issued by its committees. The decisions of SEE committee of first instance are immediately binding for the parties and enforceable, although there is a right to an appeal before the committee of second instance.

If a complaint is upheld, SEE committees may address a recommendation for the cessation or modification of the advertisement. If the infringer fails or unjustifiably delays to comply with the recommendation, the SEE can enforce the adjudication by requesting in writing that all media sources immediately interrupt the broadcasting or publication of the advertisement in question. If the infringer remains uncooperative, SEE may issue an 'ad-alert', warning the whole advertising market of the infringer's activities.

Adjudications of SEE are reported to the competent government agencies (eg, General Secretariat for Consumers etc); therefore, in cases where both the HCACP and the advertising statutes are violated, the statutory authorities may intervene to enforce the law.

2.4 Is the self-regulation system effective? Is it widely used and followed?

The Greek advertising self regulation system is widely used nowadays, since the advertising agencies and advertisers have understood that the self-regulatory, out-of-court route may offer the swift resolution of the dispute by persons having knowledge of advertising business at a relatively low cost.

The main disadvantages of the system are that:

- the complainant may not seek damages; and
- the decisions of SEE are not legally binding, although they are usually respected by the involved parties.

2.5 Are the self-regulatory system's decisions reported?

The self regulatory system's decisions are rendered in writing and are reported to the SEE website (www.see.gr), but only in the Greek language. In addition, the SEE actively promotes industry and consumer awareness of the HCACP by making it available to the public in printed copies and through its website.

2.6 Are there any key areas of focus, or key principles, that companies should be aware of?

The issues currently creating concern to the SEE committees are:

- the poor substantiation of claims used in foodstuff and food supplement advertising; and
- the fact that a lot of superiority claims (mainly used in advertising of mobile and internet service providers) are found to be misleading.

The SEE has recently focused on modern advertising practices such as influencer marketing and online behavioral (targeted) advertising.

2.7 Are there any other self-regulatory systems that govern advertising practices in Greece?

The Hellenic Bank Association (HBA) is active in the self regulation of the banking sector. Among other self-regulation codes, HBA has issued the Code of practice on the advertising of financial products and services offered by banks. However, the Code does not provide any consequences for non-compliance and it lacks enforcement mechanisms.

3 ADVERTISING LAW BASICS

3.1 What are the basic laws governing advertising claims in Greece (eg, consumer protection laws, IP laws, unfair competition laws)?

The statutes that mainly regulate advertising claims in Greece are the following:

- Consumer Protection Law, which prohibits unfair business-to-consumer commercial practices (such as misleading and aggressive advertising) and is the main legislative tool for the control of advertising claims.
- Unfair Competition Law, which introduces a general clause which prohibits all unfair commercial acts, including unfair advertising, along with a specific provision, according to which any advertisement which misleadingly gives the impression of an especially favorable offer, is prohibited. This provision mainly aims to protect competitors from misleading advertising claims.

Apart from the above general provisions, a great number of special provisions serve to regulate advertising claims in specific media (audiovisual media/radio etc) or introduce restrictions to advertising claims of specific products and services (alcohol, foodstuff, gambling etc).

Finally, in case of advertising claims of a comparative nature, IP laws must be taken into account, particularly the Copyright and Trademarks Laws.

3.2 Is substantiation required for advertising claims?

Substantiation is always required for objective advertising claims. According to the Best Practice Recommendation on Claims Substantiation ('the Recommendation') issued by the SEE, the burden is on the advertiser to prove the truth/accuracy of the advertising claim. Therefore, before publishing/broadcasting an advertisement, the advertiser must have proof supporting evidence available in order to substantiate the objective (verifiable) advertising claims. According to the HCACP, such substantiation should be available without delay and upon request of the SEE Committee, which will examine any complaint challenging the advertisement.

The type of proof required depends on the type of the advertising claim and the characteristics of the advertised product. The Recommendation indicatively stipulates the following means of proof:

- statistical surveys;
- market shares;
- sales data;
- certificates/accreditations issued from competent public authorities; and
- scientific studies and testimonials.

3.3 Are there certain types of advertising messages that do not require substantiation (ie, puffery)?

Under Greek consumer law, the common advertising practice of making statements which obviously exaggerate (puffery) cannot be considered as a misleading commercial practice. Nevertheless, Greek law does not define the criteria under which puffery is distinguished from advertising claims that require substantiation.

Some guidance on this issue can be found in the Recommendation, according to which, advertising claims which can be verified and which the average consumer is likely to regard as objective require substantiation. On the contrary, puffery is a claim that the average consumer cannot treat seriously. An example of this difference is provided in the Recommendation: the claim that a glass cleaning liquid ‘is the most economic in its category’ is verifiable and requires substantiation, while the claim that ‘it makes glass invisible’ is obvious puffery.

3.4 What are the rules governing the use of disclosures in advertising?

Specific industries are obliged by law to include warning messages and other disclosures to their marketing communications (eg, advertisements of over-the-counter medicines, food supplements, credit products etc).

Disclosures voluntarily used by advertisers (such as disclaimers, footnotes etc) are permitted to the extent that they do not mislead the average consumer. They are used to clarify the advertising claim and must not contradict or alter the general impression created by the main body of the advertisement.

Disclosures and any other superimposed text should be legible. A best practice guide has been issued by the SEE in relation to the size and timing of the superimposed text in audiovisual marketing communications.

3.5 What are the rules governing the use of endorsements and testimonials in advertising?

Under Greek law, the use of endorsements and testimonials in advertising is, in principle, permitted, with the exception of advertisements of over-the-counter medicines. In addition, there are certain restrictions in relation to endorsements of food supplements.

According to HCACP guidelines, marketing communication should not contain or refer to any testimonial or endorsement unless it is genuine, verifiable and authorized by the person making the endorsement. Any claim that a trader or a product has been approved, endorsed or authorized by a public authority or private body, when actually they have not been approved, is forbidden, as this is considered misleading advertising practice (under the Consumer Protection Law). Testimonials or endorsements which have become obsolete or misleading through the passage of time should not be used.

Finally, according to the Recommendation, testimonials themselves are not considered substantiation, and impartial evidence is required.

3.6 What are the rules governing the use of product demonstrations in advertising?

No special statutory rules apply to demonstrations of product performance. In the framework of the general principle of truthfulness, any such demonstration must present the actual qualities of the advertised product without exaggerating its performance. In light of this, it is advisable that the demonstration is performed with samples of the product already available to consumers (or prototypes that perform no differently than the actual product) and no mock-ups, modifications or alterations should be employed.

With regard to demonstrations of cosmetics’ performance, specific guidance is provided by the ‘Guiding principles on responsible advertising and marketing communication’ issued by Cosmetics Europe.

3.7 Is comparative advertising permitted? If so, are there any special rules that apply?

Under the Consumer Protection Law, comparative advertising is permitted, provided that:

- it is not misleading
- it objectively compares one or more material, relevant, verifiable and representative features of those goods and services, which may include price;
- it compares goods or services meeting the same needs or intended for the same purpose; and
- (for products with designation of origin) it relates in each case to products with the same designation.

3.8 Are there any special copyright or trademark rules that may impact comparative advertising (eg, whether a competitor’s trademark or products may be used)?

According to the Consumer Protection Law, identifying a competitor by its name or by its trademark in the course of comparative advertising is permitted, provided that any such advertisement:

- does not discredit or denigrate the trademarks, trade names, other distinguishing marks, goods, services, activities, or circumstances of a competitor;
- does not take unfair advantage of the reputation of a trademark, trade name or other distinguishing marks of a competitor or of the designation of origin of competing products;
- does not create confusion between the advertiser and a competitor or between the advertiser’s trademarks, trade names, other distinguishing marks, goods or services and those of a competitor; and
- does not present goods or services as imitations or replicas of goods or services bearing a protected trademark or trade name.

3.9 Are there any special rules that govern claims relating to geographic origin (eg, that the product is ‘made in France’)?

Advertising that includes misleading information regarding the geographic origin of a product is specifically prohibited both by the Consumer Protection Law and by the Unfair Competition Law.

In addition, provisions on the protection of geographical indications and designations of origin for agricultural products and foodstuffs are provided in EU Regulation 1151/2012, which is directly implemented in Greece, as well as in Greek Ministerial Decision No 261611/2007. There are also EU and national provisions related to the geographical indications of alcoholic beverages.

3.10 Are there any special rules governing product packaging?

Specific provisions regarding packaging of various categories of products are included in the Rules for the Handling and Marketing of Products and Services (codified in Ministerial Decision No 91354/2017). In addition, special rules and restrictions for certain categories of products are in force in other legislative texts, such as the Code of Food and Beverages (prepackaged foodstuffs) and Law 4419/2016 (packaging and presentation of tobacco and related products etc).

The use of the term ‘ecologic’ or ‘eco’ in the packaging and advertising of products is permitted only if such products are granted the EU Ecolabel (according to EU Regulation 66/2010).

3.11 Are there any special rules or guidance on the use of ‘dark practices’?

Depending on the circumstances, ‘dark practices’ may be considered to constitute misleading or aggressive commercial practices, which are prohibited by the Consumer Protection Law.

It is also possible that dark practices may violate data protection rules (the GDPR), eg, the privacy ‘by-design’ and ‘by-default’ principles or the rules on legally obtaining the users’ informed consent for the processing of their personal data. Note, also, the European Data Protection Board’s Guidelines 03/2022 on Deceptive design patterns in social media platform interfaces: how to recognize and avoid them (Version 2.0, adopted, 14/02/23).

Moreover, it is noted that the EU Digital Services Act (Regulation 2022/2065) (‘DSA’), which applies from 17 February 2024, includes an article applicable to practices not covered by EU Consumer Protection or Data Protection legislation, in which dark patterns are expressly banned from online platforms, stating: ‘providers of online platforms shall not design, organize or operate their online interfaces in a way that deceives or manipulates the recipients of their service or in a way that otherwise materially distorts or impairs the ability of the recipients of their service to make free and informed decisions’. It also stipulates that the European Commission may issue guidelines regarding how the prohibition shall apply on specific practices, highlighting, in particular:

- giving more prominence to certain choices when asking the user to make a decision, or
- repeatedly requesting users to make a choice even though that choice has already been made, especially by presenting pop-ups that interfere with the user experience, or
- making the process for cancelling a service more difficult than subscribing to it.

3.12 Are there any special rules or guidance on artificial intelligence as it relates to advertising?

Artificial intelligence (‘AI’) is not yet specifically regulated. In any case, all general rules regarding fair and lawful marketing communications apply equally to advertisements created by AI or otherwise related to AI.

It is noted that, given that AI still remains a legal ‘grey area’, advertisers should be cautious in order to ensure that AI-generated content is compliant with all consumer protection, data protection and copyright laws.

4 PRICE ADVERTISING

4.1 What are Greece’s rules regarding price advertising?

According to the Rules for the Handling and Marketing of Products and Services (codified in Ministerial Decision No 91354/2017), communications which include the price of goods are required to indicate both the selling price and the unit price. All price indications must be inclusive of VAT and other taxes (total price) and must be displayed in an unambiguous, easily identifiable and clearly legible way. If additional charges apply (eg, for postage, packaging or delivery of goods), the trader is obliged to inform consumers of these before they commit to buy (this rule is of particular significance in the field of distance sales).

4.2 What are Greece’s rules regarding advertising ‘free’ products?

The claim that something is offered for free/without charge (or similar expressions), is permissible only if the consumer does not have to pay anything other than the unavoidable cost of responding to the commercial practice and of collecting or paying for delivery of the item under the Consumer Protection Law. Advertising a product as offered for free if another one is purchased (‘buy one, get one free’) is accepted only if the consumer will pay nothing for the one item and no more than the regular price for the other.

4.3 What are Greece’s rules regarding sales and special offers?

- (a) Firstly, all communications regarding offers should be simple, clear, truthful and be made in Greek, and optionally in any other additional language, and must not mislead consumers in any way.
- (b) According to Law No 4177/2013, all price reduction communications must include the ‘previous price’ of the product along with the new, discounted price. The ‘previous price’ is the lowest price that was applied during the 30 days before the price reduction. If the price was reduced progressively during the 30 days prior to the price reduction, the ‘previous price’ is the price that was applied before the first of the successive price reductions.
- (c) The Code of Conduct for Communications of Price Reductions, ratified by virtue of Ministerial Decision No 35935/2023, contains detailed guidelines and examples of best and worst practices for the communication of reduced-price offers, in order for such communications to not constitute unfair (misleading or aggressive) commercial practices which are prohibited under the Consumer Protection Law.
- (d) Moreover, the Consumer Protection Law provides that any comparative advertising referring to a special offer must indicate, in a clear and unequivocal way, the date on which the offer ends or, where appropriate, that the special offer is subject to availability of the goods and services. Where the special offer has not yet begun, the advertisement must indicate the date on which the special price or other specific conditions shall start to apply.

4.4 What are Greece’s rules regarding rebates?

No special rules apply to this advertising practice. In view of the general principle of truthful and non-deceptive advertising, rebate promotions must clearly disclose all the information that is likely to affect a consumer’s purchasing decisions, such as the before-rebate cost of the product, the amount of the rebate and any additional terms and conditions (including purchase requirements, additional charges or fees etc), so that the consumer is informed of the actual out-of-pocket cost.

4.5 Are there other key restrictions which advertisers should be aware of regarding retail advertising practices?

Inter alia, the following retail marketing practices are prohibited in all circumstances:

- inviting consumers to purchase a product at a fixed (usually attractive) price without making them aware that there is limited stock/availability (bait advertising); and/or
- inviting consumers to purchase a product at a fixed price, but then refusing to show that product to them, or showing a defective sample of the product with the deliberate intention of promoting a different product (bait and switch advertising).

5 PROHIBITED PRACTICES

5.1 Are there any products or services that may not be advertised, or may not be advertised in certain media? (eg, guns, medicines etc)?

- (a) It is illegal to advertise products and services that are themselves illegal (eg, narcotics) or acts that are forbidden by the law (acts of terrorism, racist acts).
- (b) The following should not be advertised on audiovisual media and radio:
 - any form of tobacco and relevant products (including e-cigarettes);
 - prescription drugs and medical treatments;
 - services of sexual nature between 06.00 am and 01.00 am;
 - alcohol aimed at minors;
 - toys between 07.00 am and 10.00 pm;
 - war toys;
 - online games/bets conducted by non-licensed entities;
 - advertisements linked to religion; and
 - firearms and weapons, with the exception of hunting guns.
- (c) The following should not be advertised on the internet, or in print or outdoor media:
 - any form of tobacco and relevant products (including e-cigarettes);
 - prescription drugs; and
 - online games/bets conducted by non-licensed entities.

5.2 Are there any types of advertising practices that are specifically prohibited (eg, telemarketing to mobile phones)?

- (a) According to the general rule provided in the Consumer Protection Law, unfair (eg, misleading, aggressive etc) advertising practices are prohibited. This principle is supplemented by a blacklist of specific commercial practices that are considered misleading or aggressive under all circumstances, some of which are based on particular advertising practices.
- (b) Under Greek legal theory, subliminal messages, shock tactics, dangerous sounds or visual effects qualify as unfair commercial practices. In addition, subliminal advertising in audiovisual media and radio is expressly forbidden (in the Audiovisual Media Law and the NCRTV Code of TV/radio advertising).
- (c) Finally, the following practices of broadcast advertising are also banned:
 - advertising which encourages behavior prejudicial to health or safety;
 - advertising which encourages behavior grossly prejudicial to the protection of the environment;
 - advertising which plays on consumers' superstitions or fear.
 - telemarketing that incites minors to buy or rent the advertised products and services;
 - advertising which encourages children to buy products by phone order or mail;
 - advertising that encourages minors to convince their parents or other persons to buy products or services or that exploits the trust of minors towards their parents, teachers or other persons; and
 - advertising that may be harmful, mentally or physically, to minors.

5.3 Are there any laws or regulations governing indecency or obscenity that apply?

The general rule is that advertisements must not offend public morals. The Greek Supreme Administrative Court has ruled (Decision 1319/2004) that a nude outdoor advertisement was unfair because it offended the standards of decency prevailing in Greece.

The issue of decency in advertisements offered by audiovisual media and radio is mainly regulated by the Audiovisual Media Law and the NCRTV Code of TV/radio advertising. Broadcast advertisements must respect human dignity and must not discriminate based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation.

6 SPONSOR/ADVERTISER IDENTIFICATION

6.1 Are there special rules requiring that advertising identify who the advertiser/sponsor of the advertising is?

The HCACP states that the identity of the advertiser should be transparent and, where appropriate, marketing communications should include contact information to enable the consumer to get in touch with the advertiser without difficulty.

7 BRANDED CONTENT

7.1 Are there any special rules governing the integration of advertising content and entertainment (or editorial) content?

Under the Greek Consumer Protection Law, which covers all media, the use of editorial content in the media to promote a product, where a trader has paid for the promotion without making that clear in the content or by clearly identifiable images or sounds, is forbidden (ie, disguised advertising). Moreover, hidden commercial communication is prohibited in audiovisual and audio media (TV and radio), according to the Audiovisual Media Law.

According to the HCACP, all marketing communications should be clearly distinguishable as such, whatever the form and medium used. When an advertisement appears in a medium containing news or editorial matter (native advertising), it should be so presented that it is readily recognizable as an advertisement and the identity of the advertiser should be apparent. Also, marketing communications must not mislead the consumers as to their promotional purpose and should not be ‘disguised’ eg, as market research, consumer surveys, user generated content, private social media posts, independent reviews etc.

Regarding commercial sponsorships and product placements, the Audiovisual Media Law sets out a number of restrictions for audiovisual media:

- (a) The basic principle is that the autonomy of the media service provider must be respected. Sponsored/product placed programs must not directly encourage the purchase or rental of goods or services.
- (b) Sponsorship/product placement of cigarettes (or other tobacco products including e-cigarettes) and medicines that are available only on medical prescription is prohibited. Nevertheless, sponsorship of programs by undertakings whose activities include the manufacture or sale of medicines is permitted but it may promote only the name or the image of the undertaking (not specific medicinal products).

- (c) Certain types of programming may not be sponsored/product placed (eg news). Product placement is permitted in cinematographic works, films and series made for audiovisual media services, sports programs and light entertainment programs, with the exception of programs directed to children.

In the field of industry self regulation, the HCACP includes an entire chapter on best practices in Sponsorships (Chapter B).

7.2 Are there any special disclosure or other obligations when integrating advertising content with other content?

Both the Law and self-regulatory rules provide that all marketing communications, in any form and in any medium, should be clearly identifiable as such. Disclosure may be by a variety of means, depending on the type of advertising communication, as long as it is easily and clearly understandable to consumers that the content is an advertisement.

Also, under current legislation on audiovisual media, viewers must be clearly informed of any sponsorship agreement or the existence of product placement.

Sponsored programs must be clearly identified as such by display of the name, logo and/or any other symbol of the sponsor at the beginning, during and/or the end of the programs. However, note that the appearance of a sponsorship logo during children’s programs, documentaries and religious programs is prohibited.

Programs containing product placement must be appropriately identified at the start and the end of the program, and when a program resumes after an advertising break, in order to avoid any confusion on the part of the viewer. Under the NCRTV Guidelines, in cases of product placement, TV channels must show, for a period of ten seconds, the specific disclosure ‘the program which follows contains product placement’ and a special logo. A similar disclosure must be shown at the end of the program.

8 SOCIAL MEDIA

8.1 Are there any special rules governing the use of social media for advertising purposes?

- (a) With regard to online commercial communications, the rule that advertisements should be clearly identifiable as such is stipulated in Presidential Decree No 131/2003, which implemented the European e-Commerce Directive (2000/31) into Greek Law. In addition, the identity of the advertised entity should also be clear in all marketing communications.
- (b) Furthermore, marketing communications via social media are governed by all laws applicable to advertising in general; ie, the provisions of the Consumer Protection Law and the general principles of legal, decent, honest, truthful and socially responsible advertising, as well as legislation on personal data, intellectual and industrial property, unfair competition and any other rules applicable to advertising communications.
- (c) Self-regulatory rules are also directly applicable to advertising in social media. In particular, the HCACP stipulates that all advertising communications, whatever form they take and whatever the medium used, should be clearly identifiable as such and the identity of the promoter should also be clear to consumers. In addition, in December 2017, the SEE

published the Digital Marketing Communications Best Practice Guide (based on EASA's Digital Marketing Communications Best Practice Recommendation). This Best Practice Guide makes clear that marketing communications via social media:

- fall into the scope of self-regulation,
- should respect the principles and general provisions of the HCACP, and
- are subject to the control of SEE.

However, other forms of communication, such as editorial content, independent review websites, and user generated content which has not been distributed or approved by the advertiser, are not, in principle, considered to be marketing communications and, in that case, they would fall outside the remit of self-regulation.

Under the Digital Marketing Communications Best Practice Guide, the distinction in social media between marketing communications and editorial content should be clear. It should be obvious to the consumer that a message constitutes a marketing communication, and such communication must not falsely claim or give the misleading impression that the advertiser is a consumer. The identification of an advertisement as such can result from different elements, such as the lay-out or the content of the webpage, the use of identifiers etc. The rules relating to lawful collection of users' personal data are also applicable in digital marketing communications.

More recently, in November 2023, the SEE also published an annex to the HCACP on Influencer Marketing (based on EASA's Best Practice Recommendation on Influencer Marketing). The Annex clarifies the cases when, depending on the circumstances, specific online content consists of 'influencer marketing' and sets rules on how to clearly indicate that such content consists of advertising material, by using particular 'hashtags' at the beginning of it.

(d) Moreover, it is noted that the DSA, which shall be directly enforceable in Greece, also includes provisions for advertising on online platforms. Indicatively, according to the DSA, online platforms shall:

- clearly and unambiguously label all advertisements as such;
- let the users know who the advertised entity is; and
- inform the users about why they are presented with a specific advertisement.

Also, the DSA prohibits targeted advertising based on profiling of minors and also based on profiling that uses special categories of personal data, such as racial or ethnic origin, political opinions, religion, sexual orientation etc.

8.2 Is an advertiser responsible for advertising claims made in user generated content (eg, statements that a consumer makes on an advertiser's Facebook page)?

User generated content (eg, comments, posts, photos, videos, podcasts etc created by independent users) which has not been commissioned, distributed or later approved or adopted by the advertiser is not, in principle, considered to be marketing communication.

However, under specific conditions, the advertiser may be liable for claims made in user generated content. As provided in the Digital Marketing Best Practice Guide issued by the SEE, if the advertiser has commissioned, adopted, approved, recognized, accepted, distributed or actively promoted the content, the advertiser could be responsible for it. Examples of adopting/approving/accepting the content are 'liking', 'retweeting', 'sharing', or re-using it in other media by the advertiser. Also, if an

advertiser agrees with a user to create content in exchange for any kind of compensation (monetary or other), such content would have to be clearly labelled as marketing communication, and the advertiser would be liable for it.

Of course, it is illegal for the advertiser to post (or to commission another person to post) favorable reviews or endorsements for its products/services pretending to be a consumer (misleading marketing practice).

Moreover, under the Consumer Protection Law it is an unlawful, misleading, commercial practice for advertisers to state that product reviews have been submitted by consumers who really purchased or used that product, when no reasonable and proportionate steps have been taken to ensure that these reviews indeed originate from such consumers. The Law further provides that when the advertiser provides access to consumer reviews, it is of material importance to provide information on whether and how it has ensured that such reviews indeed originate from consumers who have actually used or purchased the product. If no such information is provided, the advertiser may be held liable for an unlawful, misleading, commercial practice.

8.3 Are there any key court or self-regulatory decisions that advertisers should be aware of regarding the use of social media and user generated content?

There are no key court or self-regulatory decisions at this moment, to our knowledge, that specifically concern only issues of advertising via social media. It is worth noting, however, that, since 2016, each decision of the SEE ends with the note that the SEE’s rulings are valid and applicable to all media where each disputed advertisement is present, regardless of whether they are explicitly mentioned in the decision, including digital media and social media channels.

9 RIGHTS OF PRIVACY/PUBLICITY

9.1 What are the rules governing the use of an individual’s name, picture, likeness, voice and identity in advertising?

Under Greek legal theory and jurisprudence, the right of an individual to control any commercial use of their name, image, voice and other aspects of identity (right of publicity) is considered to be an integral part of the general right of personality; therefore, the right of publicity is protected under the Civil Code, which also serves to protect the right of personality.

The right of publicity involves two aspects: a positive one, permitting the person to commercially exploit (eg, license) aspects of their identity, and a negative one, entitling the person to forbid any unauthorized commercial use of their name/image/voice/likeness etc.

Advertisers must be aware that the content of the right of publicity is very broad in Greece; eg, a Greek Court has held that the rights of a famous Greek composer were violated because his well-known lyrics were adapted and used in an advertisement for a car without his authorization.

It is noted that the right of publicity is recognized for everyone (not only famous people). In light of this, the Greek courts have repeatedly held that the use of images of residents of rural Greece (farmers etc) in advertising without their permission constitutes an infringement of their right of publicity.

9.2 Are there situations when permission is not required?

Express permission is always required for the use of an individual's picture etc, in advertising, even when it is a famous person who is depicted.

According to Greek legal theory and jurisprudence, such permission must be specific (ie, a general permission given by a famous person for the publication of their images in the media is not enough). In addition, if permission is given for the use of an image in a specific advertisement, it is not valid for any future use in other advertisements.

Finally, it is noted that obtaining permission from the person depicted in the photograph only prevents a claim for violation of the right of publicity. For any advertising use of a photo, it is necessary in addition to obtain copyright permission from the person who took the photograph (or whoever owns the relevant copyright in the photo).

10 SPECIAL CLEARANCE

10.1 Are there any specific rules governing the types of materials that must be cleared before they may be used in advertising (eg, historic places)?

Under Greek Law, the State has a special right regarding photos, slides and depictions etc of Greek antiquities, that is similar to copyright. As a result, any use of, eg, a photo of a Greek antiquity for advertising purposes is subject to prior license by the Greek Ministry of Culture and payment of the relevant fees.

10.2 Is it permissible to use other companies' recognizable products in advertising (eg, an actor wearing branded training shoes)?

This advertising practice is lawful only when the affected company, in its capacity as the legitimate right holder of trademarks, logos etc, has given its permission (under the Consumer Protection Law).

According to the similar provision of the HCACP, marketing communication should not make unjustifiable use of the name, initials, logo and/or trademarks of another firm, company or institution. Marketing communication should not in any way take undue advantage of another firms, individual's or institution's goodwill in its name, brands or other intellectual property, or take advantage of the goodwill earned by other marketing campaigns without prior consent.

Additionally, if the affected company has registered the logo, the design or the image as a trademark, the unauthorized use of such marks in the advertisement would probably also be a trademark infringement.

11 CULTURAL CONCERNS

11.1 Are there any rules that are particular to the culture of Greece which affect advertising (eg, Swedish gender equality law)?

According to a very little-known law, the national flag must not be used for advertising and commercial purposes. Nevertheless, no advertisement has been banned nor have any criminal charges been pressed against any person for infringing this provision. In fact, the use of the flag is commonplace in advertisements associated with the participation of the Greek national team in significant football competitions, such as the FIFA World Cup/FIFA Euro Cup etc.

11.2 Are there any other cultural norms that should be considered (eg, religious concerns)?

- Advertisers should consider that advertising content which involves discrimination against women is not appreciated by Greek society (eg, advertisements which provide, in a direct or indirect way, stereotypical ideas for the role of woman in society, by either focusing on the traditional role of woman as a mother and housewife or by displaying women as objects of man's desire).
- Religion is another 'sensitive' issue for a significant part of the Greek audience. The Greek Orthodox Church has a strong presence that might affect the appropriateness of certain advertising messages; therefore, religious advertising is not common, and is expressly prohibited in TV and Radio (under the NCRTV Code of TV/radio advertising).

12 MISCELLANEOUS

12.1 Is there any other general advice or cautions you would give to advertisers operating in Greece?

It is advisable for advertisers/advertising agencies coming from abroad to seek local legal advice, due to the fact that Greece lacks a systematic legal framework for advertising.

 LIST OF GALA MEMBERS 

ALGERIA

Dina Eldib & Mohamed Eldib
Eldib & Co.
Citadel Plaza Building 1, Intersection
of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: +2.0.2.2578.6000
E: dina.eldib@eldib.com
E: mohamed.eldib@eldib.com
W: www.eldib.com

ARGENTINA

Dámaso Pardo & Franco Raffinetti
Bruchou & Funes de Rioja
Ing. Enrique Butty 275, 12th Floor
Buenos Aires C1001AFA
T: +54.11.5171.2300
E: damaso.pardo@bruchoufunes.com
E: franco.raffinetti@bruchoufunes.com
W: www.bruchoufunes.com

AUSTRALIA

Peter Le Guay
Thomson Geer
Level 14, 60 Martin Place
Sydney NSW 2000
T: +61.2.8248.5800
E: pleguay@tglaw.com.au
W: www.tglaw.com.au

AUSTRIA

Stefan Kofler & Georg Huber
Greiter, Pegger, Kofler & Partners
Maria-Theresia Strasse 24,
A-6020 Innsbruck
T: +43.512.571.811
E: stefan.kofler@lawfirm.at
E: georg.huber@lawfirm.at
W: www.lawfirm.at

BAHRAIN

Andrew Fawcett
Al Tamimi & Company
Bahrain Financial Harbour, West Tower,
13th floor, Suite 1304, Office 13B,
Building 1459, Block 346
Manama Bahrain
T: + 971.0.2.813.0444
E: a.fawcett@tamimi.com
W: www.tamimi.com

BELGIUM

Jan Ravelingien
*Marx, Van Ranst, Vermeersch
& Partners*
Avenue de Tervueren 270,
1150 Brussels
T: +32.2.285.01.00
E: jan.ravelingien@mvvp.be
W: www.mvvp.be

BOLIVIA

Rodrigo Moreno & Ronald Cortez
Moreno Baldovinos
Torre Pacifico, Piso 8, Av. Sánchez
Bustamante No. 977, esq. Calle 16,
Calacoto, La Paz
T: +591.2.2791554
E: rmorenog@emba.com.bo
W: www.emba.com.bo

BOSNIA & HERZEGOVINA

Mirna Milanović-Lalić &
Jasmina Suljović
*Law Office Mirna Milanović-Lalić and
Jasmina Suljović*
Maršala Tita 50/III Sarajevo 71000
T: +387.33.558.565
E: mirna@bh.legal
E: jasmina@bh.legal
W: www.bh.legal

BRAZIL

Valdir Rocha, Roberta Medina &
Denise Louzano
Veirano Advogados
Av. Bartolomeu Mitre, 770- Leblon
Rio de Janeiro 22431-004 Brazil
T: +55.21.3824.4747
E: valdir.rocha@veirano.com.br
E: roberta.medina@veirano.com.br
E: denise.louzano@veirano.com.br
W: www.veirano.com.br

BULGARIA

Violetta Kunze & Vladislav Antonov
Djingov, Gouginski, Kyutchukov & Velichkov
10 Tsar Osvoboditel Blvd., Sofia 1000
T: +359.2.932.1100
E: violetta.kunze@dgkv.com
E: vladislav.antonov@dgkv.com
E: dgkv@dgkv.com
W: www.dgkv.com

CANADA

Catherine Dennis Brooks & Jaclyne Reive
Miller Thomson LLP
Scotia Plaza, 40 King Street West,
Suite 5800, P.O. Box 1011,
Toronto, Ontario, M5H 3S1
T: 416.595.8567
E: cdennisbrooks@millerthomson.com
E: jreive@millerthomson.com
W: www.millerthomson.com

Kelly Harris

Harris + co.
221-451 Dundas St W
Toronto M5T 1G8
T: 647.632.2907
E: kellyharris@harrisandco.ca
W: www.harrisandco.ca

CARIBBEAN

Karyl D. Bertrand (Dutch)
Bertrand Legal
Castorweg 22-24
Willemstad, Curaçao
T: +5999.461.8183
E: karyl@bertrand-legal.com

Dianne Daley & Marissa Longworth
(English)
Foga Daley
7 Stanton Terrace, Kingston 6,
St. Andrew, Jamaica
T: +876.927.4371
E: daley@fogadaley.com
E: marissa@marissalongworth.com
W: www.fogadaley.com

CHILE

Ariela Agosin & Eugenio Gormáz
Albagli Zaliasnik
Av. El Golf 150, Piso 4, Las Condes
Santiago
T: +56.2.2.445.6000
E: aagosin@az.cl
E: egormaz@az.cl
W: www.az.cl

CHINA

Philip Qu, Karen Hu & Eric Johnson
TransAsia Lawyers
Suite 2218, China World Office 1,
1 Jianguomenwai Avenue,
Beijing 100004
T: +86.10.6505.8188
E: pqu@TransAsiaLawyers.com
E: khu@TransAsiaLawyers.com
E: ejohnson@TransAsiaLawyers.com
W: www.TransAsiaLawyers.com

COLOMBIA

Juan Carlos Uribe & Sandra Ávila
Triana, Uribe & Michelsen
Calle 93B No. 12-48 P. 4,
Bogotá, D.C. 110221
T: +57.601.6019660
E: jcu@tumnet.com
E: sag@tumnet.com
W: www.tumnet.com

COSTA RICA

Uri Weinstok M.
BLP
BLP Building, 4th floor,
Via Lindora Business Center,
San Jose
T: +506.2205.3939
E: uweinstok@blplegal.com
W: www.blplegal.com

CROATIA

Mladen Vukmir
Vukmir & Associates
Gramaca 2L 10 000 Zagreb
T: +385.1.376.0511
E: mladen.vukmir@vukmir.net
W: www.vukmir.net

CYPRUS

Stelios Christofides, Vasilis
Charalambous & Antonia Frangou
George Z. Georgiou & Associates LLC
1 Iras Street, Nicosia 1060
T: +35722763340
E: stelios.christofides@gzg.com.cy
E: vasilis.charalambous@gzg.com.cy
E: antonia.frangou@gzg.com.cy
W: www.gzg.com.cy

CZECH REPUBLIC

Irena Lišková & Ladislav Mádl
Randl Partners
Budějovická 1550/15a
Praha 4.140.00
T: +420.222.755.311
E: liskova@randls.com
E: madl@randls.com
W: www.randls.com

DENMARK

Johan Løje
Løje IP
Øster Allé 42, 6. floor
DK-2100 Copenhagen
T: +45.32.42.05.41
E: jl@loje-ip.dk
W: www.loje-ip.dk

DOMINICAN REPUBLIC

Jaime R. Angeles
AngelesPons
Ave. Roberto Pastoriza 412,
Edificio Altri Tempi, Local 501
Santo Domingo
T: +809.373.9418
E: jangeles@angelespons.com
W: www.angelespons.com

ECUADOR

Carlos Alberto Arroyo Del Río
Falconi Puig Abogados
Av. Amazonas N21-147 y Roca
Edificio Río Amazonas,
Oficina 900, Quito
T: +593.2.256.1808
E: carroyodelrio@falconipuig.com
W: www.falconipuig.com

EGYPT

Dina Eldib & Mohamed Eldib
Eldib & Co
Citadel Plaza Building 1, Intersection
of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: +20.2.2510.2222
E: mohamed.eldib@eldib.com
E: dina.eldib@eldib.com
W: www.eldib.com

EL SALVADOR

Marcela Mancía
IDEAS Trademarks & Patents
Séptima calle Poniente Bis y calle José
Martí, 15-229, Colonia Escalón
San Salvador
T: +503.2566.5260
E: mmancia@ideasips.com
W: www.ideasips.com

ESTONIA

Egon Talur
Cobalt
Kawe Plaza, Pärnu mnt 15,
Tallinn 10141
T: +372.665.1888
E: egon.talur@cobalt.legal
W: www.cobalt.legal

FINLAND

Mikael Segercrantz &
Johanna Flythström
Roschier, Attorneys Ltd.
Kasarmikatu 21A, Helsinki 00130
T: +358.20.506.6000
E: mikael.segercrantz@roschier.com
E: johanna.flythstrom@roschier.com
W: www.roschier.com

FRANCE

Caroline Bouvier
Bernard Hertz Béjot
12 rue Lincoln, Paris 75008
T: +33.1.43.18.8080
E: cbouvier@bhbfrance.com
W: www.bhbfrance.com

GERMANY

Søren Pietzcker (Hamburg Office),
Dominik Eickemeier (Cologne Office),
& Thorsten Wieland (Frankfurt Office)
Heuking Kühn Lüer Wojtek
Neuer Wall 63, Hamburg
T: +49.40.355.280.53
E: s.pietzcker@heuking.de
E: d.eickemeier@heuking.de
E: t.wieland@heuking.de
W: www.heuking.de

GHANA

Olusola Ogundimu & Esohe Olajide
Integrated Legal Consultants
12, Nii Amaah Ollenu Street, Airport West
GA-193-5159, P.M.B. 52, Kanda, Accra
T: +233.302.770.496
E: olusola@integratedlegalconsultants.com
E: esohe@integratedlegalconsultants.com
W: www.integratedlegalconsultants.com

GREECE

Asterios (Aris) Syssilas & Elena Nikolarea
A. & K. Metaxopoulos & Partners Law Firm
54 Vasilissis Sofias Av., 11528 Athens
T: +30.210.7257614
E: asyssilas@metaxopouloslaw.gr
E: enikolarea@metaxopouloslaw.gr
W: www.metaxopouloslaw.gr

GUATEMALA

Marco Antonio Palacios &
Hilda Monterroso
Palacios Abogados
Diagonal 6, 12-42, zone 10,
Edificio Design Center, Torre 1,
Oficina 301, 01010, Guatemala City
T: +502.2231.8500
E: mapalacios@sercomi.com.gt
E: hmonterroso@sercomi.com.gt
W: www.palacios.com.gt

HONDURAS

José M. Álvarez & Fernando Godoy
BLP
Torre BLP, 7mo nivel, Colonia
Matamoros, Calle Venecia,
No. 2423, Tegucigalpa
T: 504.2269.1217
E: jalvarez@blplegal.com
E: fgodoy@blplegal.com
W: www.blplegal.com

HONG KONG

Angus Forsyth
Angus Forsyth & Co.
16A, Hillier Commercial Building,
65-67 Bonham Strand Sheung Wan
T: +852.2638.9099
E: angus@angfor.hk
W: www.angfor.hk

HUNGARY

Anikó Keller
Szecskey Attorneys at Law
H-1055 Budapest, Kossuth Lajos
tér 16-17
T: +36.1.472.3000
E: aniko.keller@szecskey.com
W: www.szecskey.com

INDIA

Sharad Vadehra, Kanu Priya
& Aakriti Vadehra
Kan and Krishme
KNK House, A-11 Shubham Enclave
Paschim Vihar, New Delhi-110063
T: +91.11.4377.66 66
E: knk@kankrishme.com
E: kanupriya@kankrishme.com
E: av@kankrishme.com
W: www.kankrishme.com

IRELAND

Conor Griffin
Duncan Grehan & Partners Solicitors
26 Fitzwilliam Street Upper, Dublin 2
T: +353.1677.9078
E: cgriffin@duncangrehan.com
W: www.duncangrehan.com

ISRAEL

David Wolberg
Kuperschmit, Goldstein & Co.
Kefar Netter Industrial Park,
P.O. Box 3726, Kefar Netter 4059300
T: +972.9.835.6122
E: dwolberg@kgcolaw.com
W: www.kgcolaw.com

ITALY

Ernesto Apa, Donata Cordone
& Livia Petrucci
Portolano Cavallo
Via Rasella 155
Rome 00187
T: + 39.06.696.661
E: eapa@portolano.it
E: dcordone@portolano.it
E: lpetrucci@portolano.it
W: www.portolano.it

JAPAN

Chie Kasahara
Atsumi & Sakai
Fukoku Seimei Bldg.,
Reception: 16th Floor
2-2-2 Uchisaiwaicho, Chiyoda-ku,
Tokyo 100-0011
T: +81.3.5501.2438 (Direct)
E: chie.kasahara@aplaw.jp
W: www.aplaw.jp/en/

KENYA

John Syekei, Vallarie Yiega & Daniel Mwathe
Bowmans
5th Floor, ICEA Lion Centre,
Riverside Park, Chiromo Road
Nairobi
T: +254.20.289.9000
E: john.syekei@bowmanslaw.com
E: vallarie.yiega@bowmanslaw.com
E: daniel.mwathe@bowmanslaw.com
W: www.bowmanslaw.com

KUWAIT

Andrew Fawcett
Al Tamimi & Company (Kuwait)
Burj Alshaya, 11th Floor,
Al Mirqab, Al Sour Street, Safat
T: +971.0.2.813.0444
E: a.fawcett@tamimi.com
W: www.tamimi.com

LATVIA

Indrikis Liepa & Kristine Patmalniece
Cobalt
Marijas iela 13 K-2, Riga 1050
T: +371.6720.1800
E: Indrikis.liepa@cobalt.legal
E: kristine.ravina@cobalt.legal
W: www.cobalt.legal

LIBYA

Mohamed Eldib & Dina Eldib
Eldib & Co.
Citadel Plaza Building 1, Intersection
Of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: + 218.21.444.5400
E: mohamed.eldib@eldib.com
E: dina.eldib@eldib.com
W: www.eldib.com

LITHUANIA

Žilvinas Kvietkus & Renata Vasiliauskienė
Cobalt
Lvovo 25, Vilnius 09320
T: + 370.5250.0800
E: zilvinas.kvietkus@cobalt.legal
W: www.cobalt.legal

LUXEMBOURG

Michel Molitor & Virginie Liebermann
MOLITOR Avocats à la Cour
8, rue Sainte - Zithe, B.P.690, L-2016
T: +352.297.298/1
E: michel.molitor@molitorlegal.lu
E: virginie.liebermann@molitorlegal.lu
W: www.molitorlegal.lu

MALAYSIA

Patrick Mirandah
Mirandah Asia
Suite 3B-19-3 Plaza Sentral,
Jalan Stesen Sentral 5
50470 Kuala Lumpur
T: +603.2278.86.86
E: malaysia@mirandah.com
W: www.mirandah.com

MALTA

Georg Sapiano
Aequitas Legal
Valletta Buildings, South Street
Valletta, 1103
T: +356.21.234085
E: gsapiano@aequitas.com.mt
W: www.aequitas.com.mt

MEXICO

Roberto Arochi & José Antonio Arochi
Arochi & Lindner
Insurgentes Sur 1605, 20th Floor
San José Insurgentes, Mexico City,
03900
T: +52.55.50.95.2050
E: rarochi@arochilindner.com
E: jarochi@arochilindner.com
W: www.arochilindner.com

MOROCCO

Mohamed Eldib & Dina Eldib
Eldib & Co.
Citadel Plaza Building 1,
Intersection
of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: +2.0.2.2578.6000
E: mohamed.eldib@eldib.com
E: dina.eldib@eldib.com
W: www.eldib.com

NETHERLANDS

Daniël Haije, Lisa Peek, Myrna Teeuw
& Luna Snellenberg
Hoogenraad & Haak
Cruquiusweg 109-B,
1019 AG Amsterdam
T: +31.20.305.3066
E: dh@hoogenhaak.nl
E: lisa.peek@hoogenhaak.nl
E: myrna.teeuw@hoogenhaak.nl
E: luna.snellenberg@hoogenhaak.nl
W: www.hoogenhaak.nl

NEW ZEALAND

Erich Bachmann & Julika Wahlmann-Smith
Hesketh Henry
Level 14, 188 Quay Street,
Auckland 1010
T: +64.9.375.8709
E: erich.bachmann@heskethhenry.co.nz
E: julika.wahlmann-smith@heskethhenry.co.nz
W: www.heskethhenry.co.nz

NICARAGUA

Julián J. Bendaña-Aragón &
Ana Jeanssy Fornos
*Guy José Bendaña-Guerrero &
Asociados*
PO Box 3140, Managua 00005
T: +505.2266.5662
E: julian.bendana@guybendana.com.ni
W: www.guybendana.com.ni

NIGERIA

Lara Kayode
O. Kayode & Co.
21 Olanrewaju Street Of Billingsway
Oregun Lagos
T: +234.1.291.2412
E: lara@okayode.com
W: www.okayode.com
1258

NORTH MACEDONIA

Aleksandar Kchev, Jasmina Brezovska
& Mishko Radosavljevik
Bona Fide Law Firm
Jordan Hadzikonstantinov-Dzinot 3
Skopje 1000
T: +47.23.01.01.01
E: akcev@bonafide.mk
E: jbrezovska@bonafide.mk
E: mradosavljevik@bonafide.mk
W: www.bonafide.mk

NORWAY

Lisa Digernes & Rune Nordengen
Bull & Co Advokatfirma AS
Postboks 2583 Solli, N-0203 Oslo
T: +47.23.01.01.01
E: ld@bull.no
E: rn@bull.no
W: www.bullco.no

OMAN

Andrew Fawcett
Al Tamimi & Company
Al Assalah Towers, Building 223,
Block 237, Office 409, Street 3701,
Ghubrah South Muscat
T: + 971.0.2.813.0444
E: a.fawcett@tamimi.com
W: www.tamimi.com

PANAMA

Ramón R Benedetti A.
Estudio Benedetti
Samuel Lewis Avenue, Comosa Building,
19th Floor, PO Box 823-00183
T: + 507.321.5100
E: ramon@estudiobenedetti.com
W: www.estudiobenedetti.com

PARAGUAY

Hugo Mersan, Lorena Mersan
& Liliana Nolan
MERSAN
Fulgencio R. Moreno No. 509 –
Edificio De La Colina 3° Piso
Casilla de Correos 693 – Asunción
T: + 595.21.447.739
E: hugo@mersanlaw.com
E: loenamersan@mersanlaw.com
E: liliananolan@mersanlaw.com
W: www.mersanlaw.com

PERU

Jorge Allende & Magali Garcia
Allende & Garcia Abogados
Av. del Pinar 180 Of. 504,
Chacarilla, Lima 33
T: +51.1.372.0395
E: jorge@allendegarcia.com.pe
E: magali@allendegarcia.com.pe
W: www.allendegarcia.com.pe

POLAND

Ewa Skrzydło-Tefelska & Jacek Myszko
Softysinski Kawecki & Szlezak
Legal Advisors
ul. Jasna 26, 00-054 Warsaw
T: +48.22.608.70.47
E: ewa.tefelska@skslegal.pl
E: jacek.myszko@skslegal.pl
W: www.skslegal.pl

PORTUGAL

César Bessa Monteiro & Ricardo Henriques
Abreu Advogados
Av. Infante D. Henrique, 26
Lisbon 1149-096
T: +351.217.231.800
E: bessa.monteiro@abreuvadogados.com
E: ricardo.henriques@abreuvadogados.com
W: www.abreuvadogados.com

PUERTO RICO

Eugenio Torres
Ferraiuoli LLC
221 Ponce de León Avenue, 5th Floor
Hato Rey, Puerto Rico 00917
T: +787.766.7000
E: etorres@ferraiuoli.com
W: www.ferraiuoli.com

QATAR

Andrew Fawcett
Al Tamimi & Company
Tornado Tower, 19th Floor,
Majlis Al Taawon Street,
West Bay, Doha
T: +971.0.2.813.0444
E: a.fawcett@tamimi.com
W: www.tamimi.com

ROMANIA

Elena Stan
Stratulat Albulescu Attorneys at Law
One Herastrau Office
30-32 Daniel Danielopolu Street,
District 1, Bucharest, 014134
T: +40.21.316.87.49
E: estan@saa.ro
W: www.saa.ro

SAUDI ARABIA

Nick O'Connell
Al Tamimi & Company
Level 8, Tadawul Tower, Financial Plaza,
Area 1, King Abdullah Financial District
(KAFD), Riyadh
T: +966114169666
E: n.oconnell@tamimi.com
W: www.tamimi.com

SERBIA

Slobodan Kremenjak, Nebojša
Samardžić & Kruna Savović
Živković Samardžić
Makedonska 30/II
Belgrade 11000
T: +381.11.2636636
E: slobodan.kremenjak@zslaw.rs
E: nebojsa.samardzic@zslaw.rs
E: kruna.savovic@zslaw.rs
W: www.zslaw.rs

SINGAPORE

Denise Mirandah
Mirandah Asia
1 Coleman Street, #07 - 08
The Adelphi, 179803
T: +65.63369696
E: denise@mirandah.com
W: www.mirandah.com

SLOVAKIA

Dušan Nitschneider & Peter Marciš
NITSCHNEIDER & PARTNERS
Lazaretská 12, 811 08 Bratislava
T: +421.2.2092.1213
E: nitschneider@nitschneider.com
E: marcis@nitschneider.com
W: www.nitschneider.com

SOUTH AFRICA

Kelly Thompson & Jenny Pienaar
Adams & Adams
P O Box 1014, Pretoria, 0001
T: +27.12.432.6000
E: kelly.thompson@adams.africa
E: jenny.pienaar@adams.africa
W: www.adams.africa

SPAIN

Ignacio Temiño Ceniceros,
Rubén Canales Quinto &
Carolina Montero Peralta
Abril Abogados
Calle Zurbano, 76
Madrid 28010
T: +34.91.7020331
E: ignaciot@abrilabogados.com
E: rcanales@abrilabogados.com
E: cmontero@abrilabogados.com
W: www.abrilabogados.com

SUDAN

Dina Eldib & Mohamed Eldib
Eldib & Co.
Citadel Plaza Building 1, Intersection
Of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: +2.0.2.2578.6000
E: dina.eldib@eldib.com
E: mohamed.eldib@eldib.com
W: www.eldib.com

SWEDEN

Richard Wessman
Advokatfirman Vinge KB
Smålandsgatan 20
Stockholm 11146
T: +46.0.70.886.04.04
E: richard.wessman@vinge.se
W: www.vinge.se

SWITZERLAND

Dr. Rolf Auf der Maur, Jonas Gassmann
& Sven Hintermann
VISCHER AG
Schuetzengasse 1, P.O. Box,
CH-8021 Zurich
T: +41.58.211.34.00
E: ram@vischer.com
E: jgassmann@vischer.com
E: shintermann@vischer.com
W: www.vischer.com

TRINIDAD AND TOBAGO

Mandisa Regrello
*Fitzwilliam Stone Furness-
Smith & Morgan*
48-50 Sackville Street
Port of Spain
T: +868.623.1618
E: mregrello@fitzwilliamstone.com
W: www.fitzwilliamstone.com

TUNISIA

Mohamed Eldib & Dina Eldib
Eldib & Co. (Tunisia)
Citadel Plaza Building 1, Intersection
of Mokattam Road & Autostrade,
Mokattam, Cairo 11411
T: + 20.2.2578.6000
E: mohamed.eldib@eldib.com
E: dina.eldib@eldib.com
W: www.eldib.com

TURKEY

Ugur Aktekin, Hande Hançer &
Baran Güney
Gün + Partners Avukatlık Bürosu
Kore Sehitleri Cad. No: 17,
Zincirlikuyu 34394, Istanbul
T: +90.212.3540000
E: ugur.aktekin@gun.av.tr
E: hande.hancer@gun.av.tr
E: baran.guney@gun.av.tr
W: www.gun.av.tr

UGANDA

Paul Asiimwe
Sipi Law Associates
Jocasa House, Unit 5, 3rd Floor
Plot 14 Nakasero Rd, #4180, Kampala
T: +256.414.235391/312.272921
E: paul@sipilawuganda.com
W: www.sipilawuganda.com

UKRAINE

Oleg Klymchuk, Anastasiia Finko
& Viktoriia Posvystak
Sayenko Kharenko
32/2 Kniaziv Ostrozkykh Street,
Kyiv 01001
T: +380.44.499.6000
E: okl@sk.ua
W: www.sk.ua

UNITED ARAB EMIRATES

Andrew Fawcett
Al Tamimi & Company
26th Floor, Al Sila Tower,
Global Market Square,
Al Maryah Island, PO Box 44046,
Abu Dhabi
T: +971.0.4.364.1641
E: a.fawcett@tamimi.com
W: www.tamimi.com

UNITED KINGDOM

Brinsley Dresden
Lewis Silkin LLP
5 Chancery Lane, Clifford's Inn,
London EC4A 1BL
T: +44.0.20.7074.8069
E: brinsley.dresden@lewissilkin.com
W: www.lewissilkin.com

UNITED STATES OF AMERICA

Allison Fitzpatrick, Paavana Kumar
& Louis DiLorenzo
Davis+Gilbert LLP
1675 Broadway, New York, NY 10019
T: +1.212.468.4800
E: afitzpatrick@dglaw.com
E: pkumar@dglaw.com
E: ldilorenzo@dglaw.com
W: www.dglaw.com

Jeffrey A. Greenbaum
Frankfurt Kurnit Klein & Selz P.C.
28 Liberty Street,
New York, New York 10005
T: +1.212.980.0120
E: jgreenbaum@fkks.com
W: www.fkks.com

Melissa Landau Steinman
Venable LLP
600 Massachusetts Avenue NW
Washington D.C. 20001
T: +1.202.344.4000
E: mlsteinman@venable.com
W: www.venable.com

URUGUAY

Alejandro Alterwain
Ferrere Abogados
Juncal 1392, Ferrere Tower,
11.000 Montevideo
T: +598.2.900.1000
E: aalterwain@ferrere.com
W: www.ferrere.com

VENEZUELA

Ricardo Alberto Antequera
Antequera Parilli & Rodriguez
Edificio Centro COINASA, PH-B, Avenida
San Felipe, La Castellana, Caracas 1060
T: +58.212.263.9944
E: ricardoalberto@antequera.legal
W: www.antequera.legal

ZIMBABWE

Brenda M. Wood Kahari
B.W. Kahari
Baronage House, 24 Lanark Road
Belgravia/Avondale, Harare
T: +263.242.250994/5 or 253941
E: brendak@bwkahari.com
W: www.lawyersforafrica.com



28 Liberty Street, 35th Floor, New York, NY 10005

Tel: 212.705.4895 | Fax: 347.438.2185 | Email: sbess@galalaw.com

www.galalaw.com