

Commercial - Corporate

↳ **The electronic set-up of SAs, LTDs, Private Partnerships and General Partnerships with the use of NEW model statutes for each legal form via the e-One-Stop-Shop is now applicable under the specific provisions of L.4441/2016 (fully implemented).** According to relevant information shared by the Ministry of Development, in the upcoming months, L.4441/2016 will be revised, so that sole proprietors and cooperatives can also duly start their business using the e-platform of the e-One-Stop-Shop.

Tax Law Updates

↳ Directors and administrators of legal entities, who can legally be held co-liable for tax liabilities of the legal entity, have an opportunity to submit an application for relief under the provisions of Law 4646/2019, which has introduced a more lenient regime for co-liability. Deadline expires on 12.03.2020. Under the new provisions liability presupposes negligence on the part of directors for the failure of the legal entity to meet its tax obligations and is confined only to obligations, which have arisen during the term in office of the director concerned.

↳ **Interconnection of the GSIS (TAXIS) platform with Municipal Authorities for the e-submission of changes in real estate properties located within a relevant Municipali-**

ty. The changes will relate to property characteristics (property's surface, use etc.) that are crucial for the purpose of charging of municipal fees on the respective properties.

↳ **By virtue of a decision issued in January 2020 by the General Secretary of Information Systems in Public Administration, operation of the Central Beneficial Owner Register (CBOR) has been suspended for a period of forty (40) calendar days, commencing on 20.01.2020 and ending on 28.02.2020.** Following the above suspension, the respective deadlines for registration concerning the specific categories of legal entities included in L. 4577/2018 have been extended accordingly. The new suspension period was decided, so that crucial legal issues in relation to the obligation and the registration method of certain legal entities as well as problems of technical interconnection of Beneficial Owners Registers at European level could be discussed and finalized in the meantime.

↳ **By virtue of a circular issued in late January 2020 clarifications were provided on the statutory (under L. 4646/2019, art.39 par.1) suspension of VAT imposition on the transfer of new buildings until 31.12.2022.** The suspension decision is issued by the Head of the competent Tax Office after examination of the relevant application filed by the seller/constructor. The latter is obliged to submit together with the application a list of all unsold real estate properties it owns. Provided such

list is submitted, the Head of the competent Tax Office is obliged to grant the VAT suspension. The deadline for the filing of VAT suspension applications with regard to building permits issued until the entry into force of the relevant provisions of L.4646/2019 ends six (6) months from the date of the entry into force of the aforementioned provisions (that is until 12.06.2020), whereas the deadline with regard to permits issued after 12.12.2019 ends six (6) months from the date of issue of the relevant building permit.

Civil Procedure Law Updates

↳ **The Civil Court of First Instance in Patras ruled in a decision issued in February 2020 that the compulsory advance collection of a levy imposed on civil actions for the judicial recognition of claims (*αναγνωριστικές αγωγές*), not finally adjudicated, under L.4640/2019 (art.42) is unconstitutional;** more specifically, according to the aforementioned court decision, the provision of art.42 of L.4640/2019 is contrary to the principles of the rule of law and violates the individual's right to full and effective judicial protection, under the respective provisions of the Greek Constitution (art.20 par.1, 26 par.3) and the ECHR (art.6 par.1).

Social Security Updates

↳ **A new Social Security law “Insurance reform and digital transformation of the National Agency of Social Insurance (e-EFKA)” has been recently enacted.** The draft law was accompanied by a detailed actuarial study by the National Actuarial Authority and a report by the University of Athens, when introduced to the Parliament for voting. The social security reform aims at the digitalization of the Na-

tional Social Security System through the introduction of digital pensions, issued at a large scale (85% according to relevant remarks by the Greek Labor and Social Affairs Minister) by the end of 2021. The new law will also unify all pension-granting and one-off pension bonus agencies under EFKA.

GDPR

↳ **The Greek DPA has imposed a fine of €15,000 on a maritime company due to illegal installation and operation of a CCTV system and a violation of the employee's right of access to his personal data.** The DPA has found that although the maritime company had complied with GDPR provisions (art.5 par.1 and 6 par.1 lit. [f]), the collection and use of visual material containing personal data through the company's CCTV system violated the provisions of art.9A and 19 par.3 of the Greek Constitution. Further, the DPA has found that the company did not satisfy its employee's right of access to his personal data saved in the company's PC used by the said employee (data subject).