

Regulating Artificial Intelligence in Greece: Constitutional Principles and Administrative Safeguards Beyond the Impact of the AI Act

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Abstract: *La regolazione dell'intelligenza artificiale in Grecia: principi costituzionali e garanzie amministrative oltre l'impatto dell'AI Act*- This article examines how artificial intelligence and Regulation (EU) 2024/1689 affect the Greek legal order. It argues that the AI Act has not yet significantly reshaped Greek constitutional or legislative architecture, while AI systems already influence public administration, judicial processes, cybersecurity governance, and public-sector capacity. The analysis focuses on constitutional guarantees, Law 4961/2022, access to administrative documents, automated decision-making, accountability, and digital transformation. It concludes that the AI Act chiefly consolidates challenges already arising in practice and that effective governance depends on adapting and rigorously applying existing rule-of-law safeguards.

Keywords: Artificial intelligence; AI Act; Greece; Constitutional law; Administrative law

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1. Introduction

The adoption of EU Regulation No 2024/1689 (the “AI Act”) represents a landmark in the global effort to regulate AI. Yet, at least at present, the AI Act has not significantly reshaped either the constitutional or the legislative architecture of the Greek legal order. No constitutional amendment has followed its adoption, and harmonising legislation remains limited.

Nevertheless, a paradox is already becoming apparent, as AI itself has already begun to substantially influence multiple layers of the domestic legal system. Its integration into public administration, judicial processes, cybersecurity strategy, and national policy planning has triggered renewed reflection on constitutional guarantees and administrative safeguards. The transition from the “Information Society” to an emerging “AI society” raises qualitative concerns: algorithmic opacity, automated decision-making, predictive governance, and direct risks to fundamental rights.

This contribution therefore examines the interaction between AI and the Greek legal order firstly regarding the broader constitutional debate on rights and revision. Second, it analyses existing legislative instruments, notably Law 4961/2022 and other policy initiatives. Third, it considers access to administrative documents and transparency obligations in the context of digitalisation. Fourth, it assesses due process guarantees in automated decision-making. Fifth, it addresses cybersecurity governance and finally, it evaluates public sector capacity and the broader digital

transformation strategy shaping the institutional environment in which AI operates.

The central argument is that the AI Act does not itself constitute a constitutional turning point. Rather, it reflects and systematises challenges that have already materialised through the practical deployment of AI within state functions throughout recent years. The decisive question is, therefore, not whether the AI Act transforms what is prescribed in the Constitution and other legislation, but whether existing provisions can guide the expanding use of AI in a democratic State governed by the rule of law.

2. Constitutional Impact of the EU AI Act

For several decades now, contemporary societies have been living in the era of the “Information Society,” a period in which the widespread availability of information, data and knowledge has fundamentally shaped the way people live, learn and interact. The expansion of the internet has thus far constituted its core; however, emerging technological developments suggest a transition beyond this paradigm. Interestingly, as we are witnessing the rise of the “AI society”, computational capacity and machine intelligence with various levels of autonomy and adaptability, assume greater significance than the mere availability of information.

Following Ariadne's thread that leads to today's AI era in Greece, the foundations of the constitutional recognition of the new digital capabilities lie with the constitutional revision of 2001. Ar.5A par.2 of the Greek Constitution (“the Constitution”), introduced the -then- novel right of “participation in the information society” for everyone, enabling the Constitution to embrace the transition to the first wave of digitisation, enshrining not only the enjoyment of the relevant technological advantages, but also the participation of each individual in the «social, political, cultural, labour, and broader economic landscape that [the Information Society] shaped»¹. In this sense, it complements the rights established in many other constitutional provisions, namely the right to information (Article 5A(1) of the Constitution). While this right is exercised under free market conditions, the State retains the prerogative to impose obligations on those operating commercially in the tech market in order to guarantee the ability of digital services' users to truly enjoy their rights².

To date, although the impact of the AI Act has not yet become apparent at a constitutional and legislative level, the rapid emergence of new technologies (since 2001) has renewed the reflection over the scope, limits, and resilience of existing constitutional provisions, namely those referring to “traditional rights”. Obviously, under the horizontal effect of fundamental rights (Article 25(1) of the Constitution), these concerns are equally relevant for relations between private parties.

¹ E. Venizelos, *Το αναθεωρητικό κεκτημένο*, Athens, 2002, 157-160.

² A. Takis, *Πρόσβαση στην ηλεκτρονική επικοινωνία: Η νομικοπολιτική διάσταση της σύγκλισης των τεχνολογιών*, in T. Papachristou et al. (cur.), *Το δικαίωμα συμμετοχής στην Κοινωνία της Πληροφορίας*, Athens, 2006, 58-60.

What administrative and legislative measures should the State adopt to avert risks arising from AI that may endanger the right to life? Given that health is understood both as a state of physical and mental well-being and as a social right³, and considering that AI applications may equally benefit or harm individuals, where should the limits of their autonomy be drawn? Furthermore, insofar as the right to work—both as an expression of the rule of law and as a precondition for the enjoyment of other social goods—may be placed at risk by AI-driven applications, what specific safeguards should be introduced within the framework of labour law? Finally, in light of the rise of personalised information systems, which in numerous instances have been observed to constrain freedom of expression, the free development of personality, and the right to information, what forms of state intervention may be justified to safeguard these rights, and to what extent might such developments ultimately affect the democratic principle itself? The range of relevant questions is literally inexhaustible, and the foregoing are merely indicative.

In this context, initiatives undertaken by the Greek courts on an administrative level are of particular interest and may affect the right to judicial protection⁴. In particular, the Council of State (the Supreme Administrative Court of Greece) took a decisive step toward the automation of judicial administration through the amendment of Presidential Decree 18/1989 with Law 5119/2024, which governs the procedural rules of the Court. According to the revised Article 20(1) (Article 4 of Law 5119/2024), “The legal remedy, immediately after its filing or submission to the Court, shall be assigned by the Secretariat of the competent Division, under the supervision of the President of the Division, to an Associate Judge or Rapporteur from among those assigned to the Division, for the introduction of the case to the Council, in accordance with paragraph 4 of Article 22. The assignment is made on the basis of an algorithm with equal distribution of cases to each Judge or Rapporteur.” The Explanatory Memorandum accompanying the amendment states that the introduction of algorithmic case allocation seeks to rationalise the distribution of workload within the Court, reduce delays and to limit the scope of discretionary case distribution traditionally exercised by Division Presidents. The legislator nonetheless acknowledges that the President of the competent Division retains ultimate responsibility for the proper functioning of the system, exercising supervisory control to prevent malfunctions and safeguard the fair allocation of cases.

The first area of concern lies with the design, provision and ownership of the algorithm itself. From the standpoint of the separation of powers, it remains unclear who is responsible for developing the system and how this entity is institutionally related to the judiciary. If the algorithm is provided or even maintained by external contractors or state agencies, the possibility of interference—direct or indirect—cannot be ignored. Even when embedded within the Court’s internal infrastructure, such a system

³ E. Venizelos, *Το αναθεωρητικό κεκτημένο*, Athens, 2002, 143.

⁴ *Article 20(1) Greek Constitution*, according to which “Every person shall be entitled to receive legal protection by the courts and may plead before them his views concerning his rights or interests, as specified by law.”

may influence judicial outcomes, particularly as it affects the allocation of Rapporteurs who play a crucial role in shaping the process. By determining which judge prepares and introduces a case to the Court, the algorithm indirectly influences the internal dynamics of judicial reasoning and, by extension, the procedural rights of litigants.

Similar uncertainties remain with respect to the criteria governing the allocation of cases. While the legislation itself provides only general guidance, the Council of State, through a modification of Article 12 of its Internal Regulations, has proposed parameters for allocation such as “relevance,” “subject matter,” and “previous assignment”. Even so, these terms remain ambiguous. It is not clear whether the “relevance” and “subject matter” criteria are assessed in relation to the substantive characteristics of the dispute or the specialisation and previous case assignments of each judge. Depending on these correlations, the system could risk reinforcing patterns of judicial profiling, where certain judges are repeatedly assigned to specific categories of cases, impeding the evolution of case law.

Consequently, this initiative incorporates both the promise and the peril of AI-driven judiciary. On the one hand, algorithmic allocation aims to streamline workflow; on the other, its design and implementation raise crucial questions of accountability, transparency, and institutional independence. Without clear governance structures, public documentation of algorithmic parameters, and effective judicial oversight, the system risks undermining the very principles it seeks to serve.

In light of the above analysis, many tensions may arise depending on the use of AI. The AI Act reflects these same concerns. Its provisions have been shaped on the basis of the risk and potential harm to freedoms and fundamental rights of individuals. This why its logic, echoing principles found in the ECHR, the EU Charter of Fundamental Rights, and the constitutions of the Member States, can also provide a starting point for solutions at a constitutional level. Last but not least, it should be noted at this point that, international and EU law forms an integral part of domestic law under Article 28(1) of the Greek Constitution, enjoying primacy over conflicting national provisions.

It is also worth mentioning that, at the time of writing, a discussion over a constitutional revision has recently begun in Greece⁵. The relevant question is whether the Constitution shall protect individuals expressly from the consequences of AI. On the one hand⁶ constitutional provisions should remain concise, abstract and durable over time, avoiding detailed or technology-specific regulation, given that such excessive specificity risks undermining constitutional longevity. On the other hand, explicit recognition would strengthen both the symbolic and practical protection of

⁵ PM calls for ‘bold’ constitutional changes to tackle modern challenges, in *Kathimerini*, 2-2-2026, www.ekathimerini.com/politics/1294067/pm-calls-for-bold-constitutional-changes-to-tackle-modern-challenges/.

⁶ For an analysis see F. Panagopoulou, *The European Regulation on Artificial Intelligence. A first constitutional-ethical consideration*, Berlin, 2025, 228 ff, www.logos-verlag.com/ebooks/OA/978-3-8325-6016-4.pdf.

rights of individuals against the impacts of AI, as well as ensure its ethical use⁷ Some opinions have emerged:

(a) No specific constitutional reference to AI, relying on existing provisions.

(b) Revision of existing case-specific and outdated provisions in a general and timeless manner.

(c) Introduction of a general provision for protecting individuals from the effects of AI.

(d) A general constitutional provision for a general principle of welfare, to which AI development should be oriented. This approach aligns with broader ethical discussions in AI governance, where policymakers stress that AI should promote individual well-being and not human marginalisation or instrumentalisation. This means that AI should be recognised as a tool that supports and inspires people to improve their quality of life by making use of their unique human capabilities, in the workplace, education, personal relationships, the aesthetic realm, and interaction with the State.

Considering the above, although each option has its merits, the preferable approach under the present circumstances appears to be a comprehensive constitutional revision that modernises outdated provisions⁸ and introduces a general framework addressing the human impact of technology, particularly AI. Detailed enumeration of AI-specific principles should be avoided, while the Constitution affirms the promotion of human well-being⁹ as the guiding objective of AI governance.

3. AI Policy and Regulation at the National Level

In recent years, Greece has made significant progress in terms of digitisation and the adoption of smart solutions based on new technologies, including AI. The progress is significant, both in terms of the public sector services and infrastructure, as well as in terms of initiatives that aim to position Greece as a proportionally notable force in the AI era. Such initiatives include, among others, the establishment of the High-Level Advisory Committee on AI under the Prime Minister, the adoption of National AI Strategy¹⁰ (“A Blueprint for Greece's AI Transformation”), and the “Pharos” AI factory, which hosts the Daedalus supercomputer.

⁷ X. Kontiadis, *Τι πρέπει να αλλάξει στο Σύνταγμα. 40 ερωτήσεις και απαντήσεις για τη νέα συνταγματική αναθεώρηση*, Athens, 2024, 240.

⁸ S. Vlachopoulos, *Η συνταγματική αναθεώρηση στην εποχή της τεχνητής νοημοσύνης*, in *Syntagma Watch*, 1-10-2024, www.syntagmawatch.gr/trending-issues/h-syntagmatikh-anatheorhsh-sthn-epoxh-ths-techniths-nohmosynhs/.

⁹ F. Panagopoulou, *Σύνταγμα και ευτυχία. Μπορεί το Σύνταγμα να εγγυηθεί την ευτυχία*, in *Huffington Post*, 7-7-2025, www.huffingtonpost.gr/politiki/syntagma-kai-eftychia/.

¹⁰ Hellenic Republic, Presidency of the Government, Special Secretariat of Foresight, *A Blueprint for Greece's AI Transformation*, 2024, foresight.gov.gr/en/studies/A-Blueprint-for-Greece-s-AI-Transformation/.

3.1 Law 4961/2022

At the level of legislation, Greece has not yet adopted relevant legislation specifying and implementing the provisions of the AI Act, for which discretion is left to Member States.

In light of the EU's initiatives for the Digital Decade¹¹, the White Paper on AI¹², and the High-level Expert Group on AI¹³, the country had already introduced legislation in 2022 (Law 4961/2022¹⁴) regarding the digital upgrade of public administration and the emergence of advanced technologies, which contains a clear reference to AI and more detailed provisions.

The purpose of said law is explicitly stated as “to create the appropriate institutional framework for the legitimate and safe exploitation of the potential of AI by public and private sector entities and to strengthen the resilience of public administration against threats in cyberspace” (Article 1). Subsequently, Article 4 provides the legal basis for the use of AI systems in the public sector. In particular, public-sector bodies are permitted to use AI systems in the exercise of their competences. This allows the public administration to adopt decisions or issue administrative acts with the use of AI. Notwithstanding the above, the law sets a basic condition: the use of AI applications by public administration bodies must be provided for by a specific legislative provision, which must be explicit and include “appropriate safeguards” to protect the rights of the natural or legal persons concerned.

Furthermore, according to Article 5, it should be highlighted that it is the obligation of the public sector body (which uses AI applications) to carry out an algorithmic impact assessment before using any AI application/system. In paragraph 2 of that article, the information that the competent body should consider when using AI systems is indicatively defined, including the intended purpose of using the application, the categories and types of administrative acts and decisions issued through it, the categories of data processed, the potential risks to the rights and freedoms of individuals, and the expected benefit to society as a whole in light of the potential impacts and risks associated with using such systems. At the same time, public administration bodies bear an obligation of transparency and respect for the fundamental rights of individuals, pursuant to Articles 6 and 7 of Law 4961/2022, as well as to register the AI systems they use in the special register kept by the National Transparency Authority (Article 8).

Although this law represented a groundbreaking attempt to regulate AI even before the AI Act, it has not been implemented in practice. Those of its provisions that remain relevant to date are expected to be incorporated

¹¹ European Commission, *Digital Decade Policy Programme*, digital-strategy.ec.europa.eu/en/policies/digital-decade-policy-programme/.

¹² European Commission, *White Paper on Artificial Intelligence. A European approach to excellence and trust*, in Brussels, 19-2-2020, commission.europa.eu/system/files/2020-02/commission-white-paper-artificial-intelligence-feb2020_en.pdf.

¹³ European Commission, High-Level Expert Group on Artificial Intelligence, digital-strategy.ec.europa.eu/en/policies/expert-group-ai/.

¹⁴ Law 4961/2022, tinyurl.com/pb879y.

into the new legislation when it is eventually enacted, with a view to ensuring more meaningful enforcement.

3.2 Authorities Protecting Fundamental Rights

Although there is still no relevant harmonisation legislation in Greece, as mentioned above, on 12 November 2024, the Ministry of Digital Governance announced¹⁵ the four authorities responsible for supervising and enforcing compliance with the obligations arising from EU law on the protection of fundamental rights in relation to the use of high-risk AI systems in Annex III to the AI Act. The designated authorities retain their existing powers, competences, and independence under national law with regard to the protection of fundamental rights in Greece¹⁶. In addition to the above, and in consultation with the market surveillance authority or authorities that will be appointed, they will be able, from 2 August 2026 onwards, to request or access any documentation related to compliance with the AI Act where this is necessary for the exercise of their mandate.

These authorities are the Hellenic Data Protection Authority, the Ombudsman, the Hellenic Authority for Communication Security and Privacy, and the National Commission for Human Rights.

3.3 National Competent Authorities

Although, admittedly, Greece acted quickly to designate the authorities under Article 77 of the AI Act, the same swiftness has not been observed in designating the market surveillance and notifying authority or authorities. Even though the relevant deadline has passed, it is a fact that several Member States have not yet taken the necessary actions, and differences remain between the approaches taken by those Member States that have already proceeded to making the relevant designation. This is, of course, a natural consequence of the wide discretion left by the AI Act itself. What is expected from these authorities is to strike a balance between protecting autonomy, privacy, and intellectual property and promoting innovation and research, strengthening the market and protecting competition, to supervise and certify AI systems effectively, and to advise the legislator on issues relating to AI¹⁷. In summary, the options that have been supported for Greece are:

¹⁵ Ministry of Digital Governance, *Principles for the protection of fundamental rights, in relation to the use of Artificial Intelligence in Greece*, www.mindigital.gr/archives/6901/.

¹⁶ Homo Digitalis, *List of Fundamental Rights Protection Authorities, 2024, in Greece. Article 77 of the Artificial Intelligence Regulation*, tinyurl.com/5n7azen2.

¹⁷ F. Panagopoulou, *The European Regulation on Artificial Intelligence. A first constitutional-ethical consideration*, Berlin, 2025, 92 ff, www.logos-verlag.com/ebooks/OA/978-3-8325-6016-4.pdf.

a) The Data Protection Authority taking on a primary role, given the volume of personal data that AI systems may process, a position also supported by the former President of the Authority¹⁸.

b) The second option is to merge the DPA and the Authority for the Protection of Privacy and Communications and transform them into a single National Authority for Privacy, Information and Artificial Intelligence, or to establish a new authority with three departments: Privacy, Information, and AI. This model has already been implemented in other Member States.

c) The third option is to create a new dedicated authority exclusively for AI (National AI Authority), consisting of members of the Hellenic Data Protection Authority (HDPa), the National Bioethics and Technoethics Committee, and representatives of innovation, research, the market, and other stakeholders.

Although the country's stance has not yet been made official, and given that fragmenting oversight among multiple authorities may (also) undermine the effectiveness of AI oversight and lead to the imposition of more penalties for the same violation, and thereby increasing the risk of breaching the *ne bis in idem* principle¹⁹, the legislator seems to favour supervision by the Data Protection Authority.

3.4 The High-Level Advisory Committee on AI and the National AI Strategy

The High-Level Advisory Committee on AI under the Prime Minister was established in November 2023 and is coordinated by the Special Secretariat of Foresight of the Presidency of the Government. Its mission was primarily to formulate a national policy for leveraging the capabilities of AI. In 2024, the National AI Strategy was published with the core aim of fostering the development of Greece's economy and society, while also safeguarding against the risks posed by the unregulated use of AI. The areas of priority that have been recognised include, indicatively, preparing citizens for the AI transition; improving public service; promoting the quality of health care for all; democratising access to, and improving the quality of, education; turning Greece into an attractive global destination for AI and high-tech investment; preserving and enriching cultural heritage; climate mitigation and adaptation; and supporting national security. Admittedly, Greece's national AI strategy marks a bold and essential step towards further digital transformation, and global competitiveness and certain aspects have already been translated into concrete actions.

¹⁸ E. Kollia, *Κωνσταντίνος Μενουδάκος: Υπάρχουν Αρχές και Αρχές.*, in *NB Daily*, 25-1-2024, daily.nb.org/sunenteukseis/konstantinos-menoudakos-yparchoun-arches-kai-arches/.

¹⁹ K. Parcharidis, *Οι Ανεξάρτητες Αρχές ως όργανα εποπτείας συστημάτων Τεχνητής Νοημοσύνης (T.N.) στην Ελλάδα: Σύσταση αυτοτελούς Εθνικής Ανεξάρτητης Αρχής εποπτείας της T.N.*, in *Syntagma Watch*, 19-11-2025, [www.syntagmawatch.gr/trending-issues/oi-anexarthtes-arxes-ws-organa-epopteias-tehniths-nohmodynhs-sthn-ellada/](https://www.syntagmawatch.gr/trending-issues/oi-anexarthtes-arxes-ws-organa-epopteias-systimaton-techniths-nohmodynhs-sthn-ellada/).

3.5 The “Pharos” AI Factory

“Pharos”²⁰ is the Greek AI Factory, one of the first AI Factories selected by the European Union²¹. AI Factories aim to create dynamic ecosystems, connect supercomputer infrastructures, data, and skilled human capital, support research, innovation, and the commercial exploitation of AI solutions, as well as provide access to computing power, tools, and training for SMEs, researchers, and the public and private sectors²².

Recently, the Greek Parliament passed the relevant legislation²³ for the official establishment of Pharos, which incorporates this project into the broader strategic plan for AI and ensures that it will comply with the GDPR and the AI Act. Pharos prioritises areas with significant social and economic impact, such as health, Greek language and cultural heritage, and sustainability and environment. Moreover, it hosts and utilises the new high-performance computing infrastructure, namely the national supercomputer “Daedalus”, which is currently under construction.

Among other things, the Greek AI Factory should also be considered a hub linking the wider network of AI Factories and “AI Factory Antennas” throughout the EU. In this context, connected infrastructures are being created in Cyprus, Malta, North Macedonia, and Serbia, thereby expanding the regional AI ecosystem.

3.6 Other Initiatives

In addition to the above flagship initiatives, Greece's emphasis on AI is also evident in other initiatives directly related to the administration or to state-related organisations. In this context, the following can be highlighted:

a) The establishment of a Special Secretariat for AI and Data Governance at the Ministry of Digital Governance²⁴.

b) The report “Generative AI Greece 2030”²⁵, by the National Centre for Social Research and the National Centre for Scientific Research, with the support of the Special Secretariat of Foresight, which examines the future landscape of generative AI in Greece by 2030.

c) The National Commission for Bioethics and Technoethics of Greece has issued two relevant Opinions on “The applications of Artificial Intelligence in Health”²⁶ and on “Artificial Intelligence Applications in

²⁰ Pharos AI Factory, www.pharos-aifactory.eu/.

²¹ European Commission, CORDIS, *Project* 101234269, cordis.europa.eu/project/id/101234269.

²² European Commission, *AI Factories*, digital-strategy.ec.europa.eu/en/policies/ai-factories.

²³ Law 5263/2025, lawnet.gr/wp-content/uploads/2025/12/%CE%9D_5263_2025.pdf.

²⁴ *Joint Ministerial Decision* No. 1961/2025 (Government Gazette B' 3804/17-7-2025), tinyurl.com/5dkf9sfh.

²⁵ National Centre for Social Research (EKKE) & National Centre for Scientific Research “Democritos”, *Generative AI Greece 2030*, Athens, 2023, foresight.gov.gr/wp-content/uploads/2024/04/Gen_AI_Greece_EN_s.pdf.

²⁶ National Commission for Bioethics and Technoethics, *Γνώμη για τις εφαρμογές Τεχνητής Νοημοσύνης στην Υγεία στην Ελλάδα*, 2023,

Greek Schools”²⁷, providing useful thoughts and guidelines on two issues that refer to the enjoyment of AI in two sectors with great prominence, while safeguarding the protection of the fundamental rights concerned.

4. Freedom of Information Acts and Access to Knowledge Acts

In Greece, any interested party has the right, upon written request, to access administrative documents. The right of access to administrative documents is a fundamental expression of the principle of transparency in the actions of administrative bodies and, as such, is closely linked to the principles of democracy and the rule of law.

The right to access public documents is a specific manifestation of the right to information, which is enshrined in Article 5A of the Constitution²⁸, according to which: " All persons have the right to information, as specified by law". Nevertheless, following the 2001 revision, the constitutional basis for the right to access administrative documents is primarily found in paragraph 3 of Article 10 of the Constitution, which states that: «The competent service or authority is obliged to reply to requests for the provision of information and for the supply of documents (...), as specified by law».

Specifically, the obligation consists of providing the requested information and documents within a period not exceeding 60 days. While the Constitution provides for further legislative specification, it is argued that this provision may also be directly applicable²⁹.

Furthermore, this principle guarantees citizens the right to scrutinise administrative actions and constitutes the basic, and most traditional, mechanism for ensuring the principle of transparency³⁰ governing all state activity. In conjunction with Article 20 of the Constitution, it constitutes a necessary and logical prerequisite for the exercise of the rights this article enshrines, namely legal protection and prior hearing, since without access to information held by the administration, the administered cannot effectively exercise those rights³¹.

Beyond the constitutional provisions, in Greek law, this right is also recognised in the Code of Administrative Procedure (CAP – Law 2690/99). In particular, according to Article 5 of the CAP, any interested party has the right, upon written request, to be provided with access to administrative documents, and anyone with a specific legal interest is entitled, upon written

bioethics.gr/api/files/download/2339/OPINION%20AI%20IN%20HEALTH%20GR.pdf?attachment=false.

²⁷ National Commission for Bioethics and Technoethics, *Γνώμη για τις εφαρμογές Τεχνητής Νοημοσύνης στο ελληνικό σχολείο*, 2025, tinyurl.com/4ufystve.

²⁸ E. Prevedourou, *Το δικαίωμα πρόσβασης στα έγγραφα*, 22-11-2015, tinyurl.com/y3uk3ej9.

²⁹ S. Vlachopoulos, K. Chrysogonos, *Ατομικά και Κοινωνικά Δικαιώματα*, Athens, 2017, 247, 453.

³⁰ Hellenic Data Protection Authority, Decision 19/2024, www.dpa.gr/sites/default/files/2023-06/19_2023%20anonym.pdf.

³¹ P. Lazaratos, *Το δικαίωμα πρόσβασης στα διοικητικά στοιχεία*, in *Δίκη*, 1994, 445.

request, to have access to private documents kept by public services that relate to a case pending before them or that has been handled by them.

Relatively recently, this article was replaced by Article 59 of Law 5143/24, according to which every natural person has the right, upon a written request submitted in person or electronically, whether signed or anonymous, to access public documents, both administrative and private. Administrative documents are defined as those drawn up by public services, such as reports, studies, minutes, statistics, circulars, responses from the Administration, opinions, and decisions. In addition, documents that do not originate from public services but were used or taken into account in determining administrative action or forming the opinion or judgment of an administrative body are also considered administrative documents³². Private documents are those drawn up by a private individual but filed and kept by a public body or authority.

Further changes introduced by the new law include the possibility of submitting a request electronically, the possibility of submitting an anonymous request, and a significant broadening of the concept of the *stricto sensu* public body or authority as the recipient of the relevant application, which now includes all bodies exercising public authority, regardless of their legal form. Moreover, the Ombudsman is now able to establish a working group to evaluate the implementation of this article on an annual basis in an effort to further enhance transparency. Last but not least, any natural or legal person is now entitled to exercise this right; however, only persons with reasonable interest may obtain access to documents containing personal data of third parties (Article 5, paragraph 2). The latter provision has been retained from the previous version of the article. In practice, the most significant difficulties in granting access to documents arise because of the administration's invocation of the protection of third parties' personal data. In this respect, it should be noted that since there is no single administrative authority responsible for both the protection of personal data and freedom of information, the right to data protection must be considered in relation to its function in society and balanced against other fundamental rights, in accordance with the principle of proportionality³³.

Where the requested documents contain personal data of third parties, the public body concerned, as the data controller, must assess whether the conditions for their disclosure are met (reasonable interest for ordinary personal data and the relevant conditions for special categories of data), having in mind the GDPR (Article 85) and Article 42 of Law 4624/2019. If any restrictions apply, the administration shall provide access to the requested documents, with the erasure and deletion of the personal data of third parties (Article 5, paragraph 4 of the CAP). This action should be considered “pseudonymisation” and carried out carefully in order to minimise the possibility of pseudonymisation being reversed³⁴.

³² Opinion 436/1992 of the State Legal Service, tinyurl.com/36x7h4bj.

³³ M. Canellopoulou-Botti, F. Panagopoulou, A. Michailaki, M. Nikita, *The right to access information under the GDPR*, in 3(2) *Int. J. Tech. Pol'y & L.* 131, 131-142 (2019).

³⁴ Hellenic Data Protection Authority, *Χορήγηση δημοσίων εγγράφων σε τρίτους*, 1-10-2025, www.dpa.gr/el/enimerwtiko/thematikes_enotites/dimosiostomeas/dimosiadioikhsh/xorigisi_dimosiwn_eggrafwn_se_tritous.

In light of the above, the reality is that there is currently no impact of the AI Act on the right of access to documents. Even so, when viewed from a broader perspective, it becomes clear that technological progress has had a catalytic effect on the expansion of this right. In combination with the related rights and conditions set out in legislation such as the GDPR, a clear framework for enhancing transparency and empowering citizens has been established through the right of access to public documents.

5. Due Process and Accountability

The main purpose of administrative law is to ensure a balance between the functioning of public administration and the protection of citizens' fundamental rights, while adhering to the principle of the rule of law. In doing so, it helps to prevent arbitrariness on the part of the administration and to establish the principle of accountability. In this context, the fundamental principles of administrative law play an essential role, as they ensure the lawful, fair, and effective conduct of the administration, guaranteeing that both administrative acts and administrative procedures, i.e. the actions of the administrative authorities leading to the issuance of an enforceable administrative act³⁵, are predictable, justified, and subject to review³⁶.

The Constitution does not provide for a general provision requiring the administration to follow a specific due process; however, many of the procedural rules laid down in the CAP are linked to constitutional provisions, which they further specify. A typical example is the right to prior hearing, which is enshrined in Article 20(2) of the Constitution³⁷ and elaborated in Article 6 of the CAP³⁸. The latter, together with the principle of legality, the principle of good administration, the obligation to explain decisions in accordance with the requirements of transparency, and finally the emerging principle of accountability, constitute a mesh of provisions that shape the relationship between the administration and the citizen, performing a monitoring function on behalf of society³⁹.

The integration of technology into the administrative due process raises critical legal questions regarding the actions of administrative bodies that result in the issuance of administrative acts containing permission, order, prohibition, or even sanctions.

³⁵ K. Gogou, *Διαδικαστικά σφάλματα και ακύρωση των διοικητικών πράξεων*, Athens, 2017, 27.

³⁶ P. Efstratiou, *Συστηματικά θεμέλια του ελληνικού διοικητικού δικαίου*, Athens, 2013, 97-100.

³⁷ H. Kouvaras, *Άρθρο 20(2) Συντάγματος*, in S. Vlachopoulos, X. Kontiadis, G. Tasopoulos (Eds), *Ερμηνεία κατ'άρθρο του Συντάγματος*, www.syntagmawatch.gr/my-constitution/arthro-20-par-2/.

³⁸ I. Simeonidis, *Η πρόσβαση στα έγγραφα και λοιπά στοιχεία της Διοίκησης*, Athens, 2018, 30.

³⁹ E. Prevedourou, *Η διοικητική διαδικασία ως παράγων ενδυνάμωσης του κράτους δικαίου*, in *ΘΠΔΔ* 6/2023, 601.

5.1 The Principle of Legality

According to the principle of legality, which is a cornerstone of the rule of law, every act of the public administration must be based on the law⁴⁰. The administration is obliged to act only within the limits set by law and to refrain from any action that lacks a legal basis. It is of fundamental importance, as it determines competence, the type of competence, the relevant criteria, and the procedure for exercising competence. Its application in practice is carried out initially through the selection of the rule and subsequently through its application⁴¹. In this regard, algorithmic administrative action must be based on the law and must not be arbitrary. This means that the algorithm itself must be subject to existing legislation.

This finding is emphatically confirmed by the entry into force of the new provision of Article 4 of Law 4961/2022⁴², as analysed earlier, according to which the Greek legislator is now unequivocally in favour of the permissible use of AI in administrative procedures.

The issue that arises, however, is whether we are in a position to control the process and outcome of designing and implementing automated systems in order to ensure that the tools respect the principle of legality⁴³.

5.2 The Principle of Justification of Administrative Acts

The principle of justification of administrative acts is enshrined in Article 17 of the CAP and requires the issuer of the administrative act to state the legal and factual reasons for its issuance⁴⁴. According to paragraph 2 of that article, the reasoning must be clear, specific, and sufficient, and must demonstrate that both the procedure and the content of the decision are lawful and fair. In this context, since the reasoning also relates to the issue of transparency of AI systems, the problem is whether the person making the decision is able to monitor the procedure and justify the decision in cases where an AI system has actually been used⁴⁵.

A milestone in the justification of individual administrative acts issued through automated procedures is Decision 1206/2024 of the Council of State, which was issued following the examination of an administrative appeal filed by a freelancer against the rejection of her application by the administration for financial assistance. The administration justified the rejection by stating that the application was evaluated automatically using a “linear” algorithm based on a mathematical formula and objective criteria. The administration argued that the justification of individual administrative

⁴⁰ D. Corsos, *Διοικητικό Δίκαιο, Γενικό Μέρος*, Athens-Thessaloniki, 2013, 175.

⁴¹ E. Prevedourou, *Η διοικητική διαδικασία ως παράγων ενδυνάμωσης του κράτους δικαίου (Administrative procedure as a factor in strengthening the rule of law)*, ΘΠΔΔ 6/2023, 601.

⁴² D. Batsoulas, *Τεχνητή Νοημοσύνη και Δημόσιο Δίκαιο: Μία συνεχής διάδραση*, 2024, in *Syntagma Watch*, www.syntagmawatch.gr/trending-issues/texniti-nohmosynh-kai-dhmosio-dikaio-mia-diarkhs-allhlepidrasi/.

⁴³ L. Mitrou, *Μπορεί ο αλγόριθμος να διοικεί, in Μπορεί ο αλγόριθμος..*, Heraklion, 2023, 257.

⁴⁴ *Ibidem*, 189.

⁴⁵ *Ibidem*.

acts issued through automated procedures was not necessary, given that these procedures are scientifically valid and indisputable. The Court rejected the above arguments, emphasising the obligation of administrative bodies to justify individual administrative acts, regardless of whether they are issued automatically, in order to ensure the legality and transparency of administrative action⁴⁶.

In particular, in paragraph 15 of the judgment, the Court concludes that the review of the legality of an individual administrative act issued in whole or in part on the basis of an automated electronic procedure is not linked to the technological perfection of the software or hardware used in the procedure for its issuance, but to the overall legality of the administrative act, i.e. the correct interpretation and application of the legal requirements of the rule of law governing its issuance, as well as the principle of justification.

In a broader analysis, this decision is particularly important because, despite the limited practical scope of the matter at issue, it highlights the adaptation of the fundamental concepts and principles of administrative law to the developments they are intended to cover⁴⁷: (a) it highlights the contemporary problem of automation in public administration, (b) it underlines the importance of reasoning for the validity and scrutiny of administrative acts, and (c) it adopts a comparative approach, taking into account the provisions of EU law (in particular Article 22 of the GDPR).

As follows from Article 22(3) of the GDPR with regard to the right to human intervention, and especially in light of the recent case law of the CJEU⁴⁸, which ruled that the data controller (in this case, an administrative authority or service) cannot refuse to fulfil the right of access to information by invoking trade secrets. For this reason, the CJEU has effectively made the competent national courts and national data protection authorities the guardians of the AI mathematical formulas, assigning them the responsibility of deciding what information is appropriate to disclose to the data subject on a case-by-case basis. Consequently, Article 86 of the AI Act establishes the right of high-risk AI system users to an explanation regarding individual decision-making. Compared to the GDPR, this provision is more inclusive (“any affected person” compared to the “data subject” of the GDPR), applying clear criteria (specific harmful effects on health, safety, and fundamental rights).

⁴⁶ P. Soiledakis, *Η τεχνητή νοημοσύνη στο επίκεντρο του συνταγματικού και του διοικητικού δικαίου*, Athens, 2025, 50 ff.

⁴⁷ P. Pavlopoulos, *Ο δικαστικός έλεγχος της νομιμότητας ατομικών διοικητικών πράξεων εκδιδόμενων μέσω ηλεκτρονικώς αυτοματοποιημένης επεξεργασίας δεδομένων. Σχόλια στην απόφαση ΣτΕ 1206/2024*, in *constitutionalism.gr*, 31-8-2024, www.constitutionalism.gr/o-dikastikos-elegxos-tis-nomimotitas-atomikon-dioikitikon-praxeon/.

⁴⁸ CJEU, Case C-634/21, curia.europa.eu/juris/documents.jsf?num=C-634/21; CJEU, Case C-203/22, curia.europa.eu/juris/liste.jsf?num=C-203/22.

5.3 The Principle of Prior Hearing

The principle of prior hearing of the administered is set out in Article 20(2) of the Greek Constitution and Article 6, paragraphs 1 and 2 of the CAP, and consists of the right of the administered to defend their rights or interests and to propose solutions before the imposition of a measure that is harmful to them⁴⁹. In the case of automated administrative acts, the automatically generated document, e.g. the fine, could constitute what German theory refers to as a “provisional” administrative act⁵⁰.

This approach is reflected in Article 6(3) of the CAP: “If the settled situation is subject to change, the administrative authority shall, within a period of fifteen (15) days, invite the interested party to express their views in accordance with the preceding paragraphs, whereupon it shall proceed with any new settlement”.

It is even rightly argued that fully automated administrative acts imposing penalties must be linked to the additional provision for a deferral period, to be stated in the act itself, within which the party concerned has the opportunity to appear before the administrative authority and present arguments in order to exercise their right to a prior hearing. In the same vein, an automated notice could be issued and delivered to the party concerned, informing them that an automated administrative procedure has been initiated against them⁵¹.

5.4 The Framework of Accountability

The concept of accountability is one of the central pillars of public policy-making and democratic governance in a contemporary society⁵². It is directly linked to the principle of good governance, but it is an ethical principle and a value-based behaviour rather than a mere administrative tool, reflecting the spirit of responsibility of each administrative body^{53,54}.

With the integration of AI, accountability in particular means that «the individuals or bodies responsible for the various phases of the life cycle

⁴⁹ D. Corsos, *Διοικητικό Δίκαιο, Γενικό Μέρος*, Athens-Thessaloniki, 2013, 200-201.

⁵⁰ U. J. Schröder, *Der vorläufige Verwaltungsakt*, in *JURA*, 4/2010, 255 ff.

⁵¹ P. Lazaratos, *Το δικαίωμα ακρόασης στη διοικητική διαδικασία*, Athens-Komotini, 1992, 622-623.

⁵² A. Michiotis, *Λογοδοσία και Δημόσια Διοίκηση*, in 1(1) *Επιθεώρηση Δημόσιας Διοίκησης* 102, 102-114 (2021).

⁵³ N. Milionis, *Προβλήματα λογοδοσίας στην ευρωπαϊκή δημοσιονομική διακυβέρνηση*, in *ΕφημΔΔ* 6/2018, 679-680.

⁵⁴ The term “accountability” appears in several more recent legislative acts. For example: (1) Law 3871/2010 on Fiscal Management and Responsibility, which provides that “the Government is responsible and accountable to Parliament for the management of the public finances of the General Government”; (2) Law 4305/2014 on Open Access and the Further Use of Public Sector Documents, Information and Data; (3) Law 3861/2010 (“Diavgeia”), which established the mandatory online publication of public decisions as a precondition for their entry into force; and (4) Law 4622/2019 on the Executive State, which introduced structural and operational reforms aimed at strengthening accountability and transparency mechanisms within public administration and established the National Transparency Authority.

of an AI system, from development to implementation, should be accountable for the outcomes it produces»⁵⁵. Law 4961/2022, as described, attempts to establish a level of accountability through the algorithmic impact assessment provided for in Article 5, while Article 6 upholds the principle of transparency, according to which any public body that uses an AI system in its operations must disclose information on: a) the performance of the algorithmic impact assessment; b) information about the system itself, such as its operating parameters, capabilities, and technical characteristics; c) the timing of the system's entry into operation; and finally d) the types of decisions taken or acts issued with the involvement of the system or supported by it.

At this point, we must emphasise that the principle of transparency is directly linked to accountability within the framework of administrative procedures and is based on the overt actions of all the relevant state bodies⁵⁶, which entails that, in line with the democratic principle, their actions must be carried out in the public eye and be accessible to citizens so that they can contest a given decision⁵⁷.

The principles of good governance also support accountability, whereby public sector bodies and their personnel assume responsibility for their decisions and actions by virtue of their position. In combination with the reporting of subordinate bodies to their hierarchical superiors, this ensures the cycle of accountability, which in turn safeguards popular sovereignty itself.

Of course, the aforementioned accountability framework would be ineffective in the absence of specific provisions regarding the attribution of liability. According to Article 105 of the Introductory Law to the Civil Code: “For unlawful acts or omissions of public bodies in the exercise of the public authority entrusted to them, the state shall be liable for compensation, unless the act or omission was in breach of a provision existing for the benefit of the public interest.” Under Article 71 of the CAP, the claim for compensation is broadly defined and specifically includes any administrative action that gives rise to such a claim.

These provisions highlight the obligation of the state or public entities to remedy, usually in the form of monetary compensation, the harmful consequences caused by the unlawful acts or omissions of their bodies⁵⁸. The liability to pay compensation arises not only from the issuance of an unlawful enforceable administrative act or from the unlawful omission to issue such an act, but also from unlawful material actions of public bodies

⁵⁵ Australian Government, Department of Industry, Science and Resources, in Australia's AI Ethics Principles, 2-12-2025, www.industry.gov.au/publications/australias-artificial-intelligence-ethics-framework/australias-ai-ethics-principles.

⁵⁶ S. Vlachopoulos, *Διαφάνεια της κρατικής δράσης & Προστασία προσωπικών δεδομένων. Τα όρια μεταξύ αποκάλυψης και απόκρυψης στην εκτελεστική εξουσία*, Athens-Komotini, 2007, 27.

⁵⁷ Ch. Moukiou, *Οι αλγόριθμοι και το διοικητικό δίκαιο*, Athens, 2025, 45.

⁵⁸ P. Soilentakis, *Ευθύνη προς αποζημίωση από νόμιμες πράξεις – Το θεμέλιο και η επικουρικότητα*, in *ΔΔικ*, 4/2022, 576.

or legal entities governed by public law, or from omissions of lawful material actions on their part⁵⁹.

Therefore, in order to avoid such liability, the public administration must, on the one hand, identify the necessary prerequisites for the use of AI systems and, on the other hand, supervise the operations of the algorithm⁶⁰.

In light of the foregoing, the objective is to establish a reliable institutional framework for the development and use of AI in a fair, transparent, and accountable manner, so that the administrative process is carried out in accordance with the principles enshrined in the Constitution and society can benefit from its capabilities, while mitigating the existing risks of potential misuse.

6. Cybersecurity

Greece, in line with the requirements and developments of European law, has taken several steps to improve the level of resilience and cybersecurity both of the country itself and of entities, especially those falling within the scope of the NIS II Directive.

More specifically, it incorporated the requirements of the said Directive since November 2024 (Law 5160/2025⁶¹) and subsequently specified the requirements of the framework with a series of Ministerial⁶² and Joint Ministerial Decisions⁶³ and Joint Ministerial Decisions⁶⁴.

Prior to the adoption of the NIS II harmonisation measures, the National Cybersecurity Authority (NCSA), a successor to the Cybersecurity Directorate of the Ministry of Digital Governance, was established by Law 5086/2024⁶⁷ as a legal entity governed by public law. At the level of governance, the Authority has its own head, while remaining under the supervision of the Minister of Digital Governance. Its purpose is to organise, coordinate, implement, and oversee a comprehensive framework of strategies, measures, and actions to achieve a high level of cybersecurity in the country in terms of prevention, protection, deterrence, detection,

⁵⁹ E. Prevedourou, *Η αστική ευθύνη του δημοσίου*, 29-5-2025, tinyurl.com/35ddm5az.

⁶⁰ A. Ciafardoni, *The Responsibility in Automated Administrative Decisions*, in 3(1) *European Review of Digital Administration & Law* 151, 151 (2022).

⁶¹ Law 5160/2024, cyber.gov.gr/wp-content/uploads/2024/12/ENOTHTA_5_%CE%9D%CE%9F%CE%9C%CE%9F%CE%98%CE%95%CE%A3%CE%99%CE%91_fek_a_195_2024-5160-2024-1.pdf.

⁶² Decision 1899/2025 of the Minister of Digital Governance, cyber.gov.gr/wp-content/uploads/2025/08/%CE%91%CE%A0%CE%9F%CE%A6%CE%91%CE%A3%CE%97_%CE%A5%CE%A0%CE%9F%CE%A5%CE%A1%CE%93%CE%9F%CE%A5_1899_20250204250.pdf.

⁶³ Joint Ministerial Decision 1645/2025, cyber.gov.gr/wp-content/uploads/2025/04/FEK_KYA_1645_2025_paratasi_ypolis_stoixeiwn_ontotitwn.pdf.

⁶⁴ Joint Ministerial Decision 1381/2025, cyber.gov.gr/wp-content/uploads/2025/03/KYA_APOFASI_10-Feb-2025_FEK-463_DEFTERO-TEFHOS.pdf.

⁶⁵ Joint Ministerial Decision 1689/2025, cyber.gov.gr/wp-content/uploads/2025/05/20250202186.pdf.

⁶⁶ Joint Ministerial Decision 1990/2025, cyber.gov.gr/wp-content/uploads/2025/08/%CE%92-4241.pdf.

⁶⁷ Law 5086/2024, cyber.gov.gr/wp-content/uploads/2024/12/%CE%9D%CE%9F%CE%9C%CE%9F%CE%A3-5086_%CE%A6%CE%95%CE%9A.pdf.

response, recovery, and resilience from cyberattacks, while also shaping, drafting, and updating the National Cybersecurity Strategy.

The most recent National Cybersecurity Strategy⁶⁸ was published in December 2025, covering the period 2026-2030 and, among other objectives and measures, refers for the first time to AI and its potential use by cybercriminal groups and even state-sponsored actors to automate and escalate attacks. In particular, it recognises its potential use for sophisticated social engineering attacks, escalated and autonomous attacks, the development of advanced malicious code, and the detection and exploitation of vulnerabilities. Specifically, under Action 3.E.2⁶⁹ concerning the "Implementation of a framework of measures and actions for Artificial Intelligence and Cybersecurity", the NCSA aims to develop and implement a national framework of measures and actions for the integration of cybersecurity into AI systems. The framework will cover risk management, data and algorithm security, as well as alignment with the AI Act, promoting the safe and reliable use of AI in the public and private sectors. The action has a short-term implementation period (2026-2027).

Among its requirements, the AI Act introduces the obligation for high-risk systems to achieve an appropriate level of accuracy, robustness, and cybersecurity so as to be resistant to attempts by unauthorised third parties to alter their use, results, or performance by exploiting vulnerabilities in the system (Article 15). These requirements come in addition to the security and resilience obligations included in other key EU regulations and have not gone unnoticed by the NCSA, which recognises that such systems must be sufficiently resilient throughout their life cycle in order to avoid errors, failures, and inconsistencies arising in the systems themselves and in the environment in which they are used, in particular due to their interaction with people, other systems and, ultimately, other companies and public bodies. Even more so, in cases where entities subject to NCSA oversight use such systems, particular emphasis should be placed on their compliance with both the formal and substantive requirements of the relevant frameworks. It appears that the NCSA, with its specialised expertise, will be an ally of the authority (or authorities) called upon to supervise compliance with the AI Act.

In practice, the NCSA has significantly invested in raising awareness among organisations and citizens regarding cyberattacks, while seeking to facilitate the compliance of entities with the cybersecurity framework through various tools. To date, particular emphasis has been placed on the proper response to and reporting of incidents, while enforcement checks on entities are expected to intensify once the Authority is fully staffed.

Finally, it is worth noting that with a recent circular⁷⁰, the NCSA reminded public sector bodies and entities of their obligation to register on the digital registration platform for entities under Law 5160/2024, which demonstrates the Authority's willingness to treat the public sector on an

⁶⁸ Ministry of Digital Governance, Εθνική Στρατηγική Κυβερνοασφάλειας 2026–2030, cyber.gov.gr/wp-content/uploads/2025/12/%CE%95%CE%A3%CE%9A-2026-2030.pdf.

⁶⁹ *Ibidem*, 94, 111.

⁷⁰ Ref. No. 28211, 10-9-2025, cyber.gov.gr/wp-content/uploads/2025/09/EGKYKLIOS_PLAFORMA_EGGRAFHS.pdf.

equal footing, while recognising the importance of the public sector in maintaining the country's overall high level of resilience.

7. Public Sector Capacity

Although the prolonged financial crises of recent years have affected Greece's performance in digital transformation, the country has accelerated and is now approaching the levels of digital maturity of other EU Member States, showing an upward trajectory.

For reference, in the DESI index 2022⁷¹, Greece scored 52.35% for the sub-index “Digital public services for citizens”, compared to the EU average (74.63%). Greece also scored 47.60% on the sub-index “Digital public services for businesses”, compared to the EU average (81.71%). On the same index for 2024⁷², regarding “Digital public services for citizens”, although Greece performs slightly below the EU average (75.9 against an EU average of 79.4), it records a recent annual growth of 17.5%. On the “Digital public services for businesses” Greece scored 86.2, performing above the EU average (85.4), reflecting an annual growth of 17%. According to the European Commission's report on the goals for the digital decade⁷³, “Greece continues its steady progress in rolling out fibre for gigabit connectivity; however, it struggles to fill the gap of ICT specialists and to address a severe digital gap in basic digital skills between different age groups and between rural and urban areas. Despite this, the country displays an encouraging growth rate in the digitalisation of small and medium-size enterprises.”

To achieve its goals, the country has developed a holistic national digital transformation strategy, which is reflected in the “Digital Transformation Bible” (White Paper on Digital Transformation). This document sets out specific priorities for the country's digital transformation for the public sector, mainly by shaping a large portfolio of cross-sectoral and sector-specific digital transformation actions and initiatives in line with the objectives of the EU's digital decade. In particular, according to the new Digital Transformation Bible 2026-2030⁷⁴, the ultimate goal is to migrate services to the digital environment by 2027. Numerous projects that have contributed to this goal throughout the years, but if we were to single out a few recent ones for the purposes of this article, we would mention:

a) Gov.gr, the single digital gateway that began operating in 2020 (Law 4635/2019) and provides access to a wide range of digital services for citizens and businesses. This platform is an important step towards the digitisation of public administration, promoting convenience and efficiency in the provision of services.

b) The creation of the National Register of Public Administrative Services “MITOS”, which aims to identify, outline, and model all state

⁷¹ European Commission, ec.europa.eu/newsroom/dae/redirection/document/88768.

⁷² European Commission, Greece – 2024 Digital Decade Country Report, digital-strategy.ec.europa.eu/en/factpages/greece-2024-digital-decade-country-report.

⁷³ European Commission, *Greece – 2025 Digital Decade Country Report*, digital-strategy.ec.europa.eu/el/factpages/greece-2025-digital-decade-country-report.

⁷⁴ GRNET, Vivliothiki Logismikou (Vivlos), vivlos.dev.grnet.gr/.

administrative procedures, which is a prerequisite for the successful digitisation of basic public services.

c) The implementation of the Gov.gr Wallet, which, in line with the eIDAS Regulation, became operational in July 2022. The Gov.gr Wallet allows citizens to generate, store, and control their digital documents. It currently includes the national identity card, driving licence, vehicle details (MyAuto), academic ID, digital card of the Public Employment Service (DYPA), and the disability card.

Along with the “Digital Transformation Bible”, the country has also developed and documented other strategic priorities for various aspects of digital transformation, such as the 2021-2027 National Broadband Plan⁷⁵, the National Cybersecurity Strategy, and the National AI Strategy, as mentioned above.

In particular, it is worth highlighting certain projects that already incorporate AI capabilities. These include:

a) The first AI Digital Assistant⁷⁶, “mAigov”, operating in the Gov.gr environment, to further facilitate citizens' daily life by simplifying and speeding up their interaction with the public sector.

b) The automation of real estate registries in Greece⁷⁷ using AI to read, categorise, and legally evaluate real estate contracts, thereby saving resources and reducing response times for real estate transactions.

c) At the tax level, the process of extracting data from large databases has been in use since 2021. The relevant technology is being implemented by the Ministry of Finance through the identification of individuals with the help of “special algorithms, in combination with the mutual assistance procedure”⁷⁸.

To make all these initiatives a reality, the Greek Parliament has approved several relevant laws to promote digital transformation, mainly Law 4623/2019 and Law 4727/2020 on digital governance and its implementation, and Law 4961/2022 on emerging technologies, which have been briefly examined earlier in this analysis. It is worth noting that Law 4727/2020 on digital governance is probably the milestone in the country's digital transformation process, as it establishes the legal framework on which all these projects are based, covering aspects such as the general principles of digital governance, citizens' universal access rights to public sector data, digital inclusion, trust services, open data, digital transparency, interoperability, digital infrastructure, public digital governance registers, and the development of the 5G ecosystem.

Last but not least, in order to support digital transformation at the executive level, initiatives have been taken to empower public administration employees. These include “AI for All”, in collaboration with

⁷⁵ Ministry of Digital Governance, tinyurl.com/ythwhwk9.

⁷⁶ Ministry of Digital Governance, www.mindigital.gr/archives/5671.

⁷⁷ Hellenic Cadastre, *The first public body to incorporate artificial intelligence*, 4-9-2024, www.ktimatologio.gr/grafeio-tipou/deltia-tipou/1493.

⁷⁸ Ministry of Finance, Ref. 1120/27-5-2013 on Mutual Administrative Assistance, in the Recovery of Claims between Member States of the European Union (Law 4072/2012; Directive 2010/24/EU), www.taxheaven.gr/circulars/16564/pol-1120-27-5-2013.

Google⁷⁹, through which public sector employees are trained in AI, as well as a similar training in cloud computing and AI, in collaboration with Microsoft⁸⁰.

The above indicative references illustrate that digital transformation and the transition to algorithmic administration go beyond the nature of a simple technological innovation and act as a decisive factor in improving the lives of citizens. According to Eurobarometer 2025⁸¹, 78% of Greek citizens believe that digitisation makes their daily lives easier, while 92% consider digital transformation to be of high importance. By simplifying administrative procedures, enhancing transparency, and enabling more evidence-based public policy-making, digital transformation effectively strengthens the relationship between the State and its citizens.

8. Conclusion

The analysis demonstrates that the immediate impact of the AI Act on the Greek legal order remains limited. The Regulation has not yet reconfigured constitutional provisions or fundamentally reshaped the national legislative framework. Its role is, for the time being, primarily normative and anticipatory.

At the same time, AI itself, as an evolution of the “traditional” digitalisation reforms is already structurally embedded in many public sector procedures and governmental initiatives. The AI Act should therefore be understood not as a constitutional or legal schism, but as a regulatory framework that consolidates concerns already emerging from practice. Accordingly, change will not stem from the formal implementation of the Regulation, but from the everyday integration of algorithmic systems into State functions, in accordance with the rule of law as already established. In this sense, the transition to an “AI society” does not require radical changes on a constitutional or administrative level as much as it demands the rigorous application and careful adaptation of the ones already in place.

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⁷⁹ Ministry of Interior, *Το Υπουργείο Εσωτερικών ξεκινά την κατάρτιση των δημοσίων υπαλλήλων σε θέματα τεχνητής νοημοσύνης σε συνεργασία με την Google*, www.ypes.gr/to-ypourgeio-esoterikon-xekina-tin-katartisi-ton-dimosion-ypallilon-se-themata-technitis-noimosynis-se-synergasia-me-tin-google/.

⁸⁰ Ministry of Digital Governance, tinyurl.com/25u56mb6.

⁸¹ European Commission, Greece – 2025 Digital Decade Country Report, digital-strategy.ec.europa.eu/en/factpages/greece-2025-digital-decade-country-report.

