



Telemedicine in Greece: The 2025 Legal Landscape

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hereof*

I. Introduction

Greece has recently introduced a comprehensive legal framework governing telemedicine, setting out rules for the provision of remote medical services through digital applications that enable medical acts such as examination, diagnosis, prescription, and consultation to be performed remotely. Telemedicine represents a rapidly growing sector in healthcare, driven by increasing demand for convenient, accessible, and efficient medical services. It creates opportunities for businesses to develop innovative digital platforms and for healthcare professionals to expand their patient base beyond geographic boundaries.

Following the amendment of the Greek Code of Medical Ethics (Law 3418/2005) by Law 5129/2024, **certain medical acts - such as prescribing medication, ordering paraclinical tests, issuing medical certificates and attestations, and providing general advisory support to patients - may now be performed remotely through telemedicine systems using digital applications.**

To implement these new provisions in practice, a Ministerial Decision was subsequently adopted, setting out the requirements and the procedure for the establishment of the telemedicine system to be used for remote medical examinations and prescriptions.

II. Ministerial Decision No. 7686/2025 on Telemedicine

(a) Definition of telemedicine

Telemedicine includes the medical services provided to patients remotely through the use of digital applications by physicians or private primary healthcare providers operating legally in Greece. In particular, telemedicine includes **tele-examination**, (i.e. a medical act performed through a connection with the patient, who communicates remotely with the doctor and the

diagnosis may result in the prescription of treatment or medication) — as well as **telemonitoring**, meaning the remote monitoring of patients' health status, particularly those with chronic conditions.¹

(b) Operators of telemedicine applications

Operators of telemedicine application refer to private legal entities of any form, whose statutory purpose is the operation of telemedicine applications, in accordance with the terms and conditions of the Ministerial Decision. The operators of telemedicine applications are obliged to notify the Ministry of Health of the commencement of their operation within forty-eight (48) hours from the initiation of their operations.

(c) Procedure

Following the signing of an agreement between, on one hand the physicians and/or private primary healthcare providers and, on the other hand, the operators of telemedicine applications, the necessary and appropriate information of the physician/private primary healthcare provider is registered in the telemedicine application.

The patients (located in Greece or abroad), who are registered and authenticated as users in the telemedicine applications, may choose either to directly submit a request for communication or a medical session through the telemedicine application to the physician of their choice, provided that this physician is contracted with the operator of telemedicine application, or to select a physician proposed by the telemedicine application as immediately available.

The physician who accepts the patient's request, as submitted in accordance with the procedure described in the preceding paragraph, sends the patient, by a corresponding electronic message and in a secure manner, a specific electronic link, either to the email address or to the mobile phone number provided by the patient.

*** Telemedicine sessions are not reimbursed by the Social Security Institutions or the Greek State.

¹ Telemedicine, in the context of the Ministerial Decision No. 7686/2025, does not include medical teleconferencing, (i.e. diagnosis and/or treatment carried out without the presence of the patient, which consists of the exchange of information among multiple physicians who make a diagnosis based on the data contained in the patient's medical record) and tele-assistance, meaning the act that allows one physician to remotely assist another physician who is performing a medical or surgical procedure, or to assist, in emergency situations, a volunteer in providing first aid.

(d) Penalties

Physicians who fail to comply with the provisions of this Ministerial Decision shall be subject to disciplinary action and may also face revocation of their license and a fine of between fifty thousand (50,000) and two hundred thousand (200,000) euros.

Operators of telemedicine applications who fail to notify the Ministry of Health of the commencement of their operations may be subject to an administrative fine of thirty thousand (30,000) euros.

(e) Personal Data

The Ministerial Decision sets explicit and strict obligations regarding privacy and data protection in the operation of telemedicine systems. Telemedicine applications must ensure the security, integrity, and confidentiality of personal and health data in full compliance with the GDPR and applicable national legislation, implementing all necessary technical and organizational safeguards. Both the operators of telemedicine platforms and participating physicians act as independent data controllers, lawfully processing personal and health data for the provision of medical services while guaranteeing patients' full data protection rights.

III. Our role

We deliver integrated solutions by providing comprehensive legal support to both healthcare providers and technology operators. For our clients, this means not only tailored legal advice on the applicable regulatory framework, but also practical guidance on the establishment, notification, and lawful operation of telemedicine platforms — including the drafting of contractual arrangements between physicians, medical centers, and platform operators.

We offer:

- Regulatory and compliance guidance on data protection, cybersecurity, and patient confidentiality, ensuring full alignment with the GDPR.

- Strategic support in developing telemedicine and digital health business models with a focus on cross-border operations, compliance, and risk and liability management.

IV. Conclusion

Most of these amendments have not yet been applied in practice, and the issuance of clarifications and implementing guidelines is still being anticipated.

Our firm closely monitors developments in the healthcare legal framework. For more information, you may contact us.

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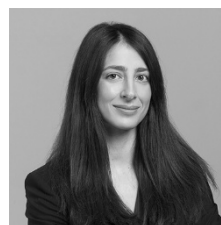
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