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GREECE INTRODUCES NEW LEGAL FRAMEWORK FOR TELEMEDICINE

The Greek healthcare sector has taken a significant step forward in regulating digital health services with the adoption of a new Ministerial Decision no. 7686/2025 on telemedicine (GGI B 1083/10.03.2025) (the “**Telemedicine MD**”).

The Telemedicine MD establishes a long-awaited regulatory framework for the provision of remote medical services, aiming to align Greece with broader European trends in digital healthcare. While this marks an important milestone, key questions remain about the practical implementation of these rules, particularly concerning reimbursement and data protection compliance.

Digital Health in Greece: A Developing Landscape

Digital health is not explicitly defined under Greek law. However, the term is widely used to describe a range of digital tools and services that support the provision of healthcare. These include telemedicine, electronic health records (EHRs), and e-prescription services that enhance the interoperability of the Greek healthcare system.

Greece’s **Digital Transformation Bible 2020–2025**, the country’s central strategy for digital modernization, places a strong emphasis on enhancing healthcare services through digital tools. Among others, it envisions the expansion of telemedicine services to improve healthcare accessibility, particularly in remote areas and the enhancement of digital health infrastructure, including e-prescription and e-referral systems.

While the Digital Transformation Bible lays the foundation for a more connected and efficient healthcare system, it does not yet address the reimbursement of digital health services—a key issue that remains unresolved under the new telemedicine framework.

Key Provisions of the Ministerial Decision on Telemedicine

The newly enacted Ministerial Decision provides a legal basis for the operation of **telemedicine applications** in Greece. It clarifies that telemedicine services encompass two primary activities: **teleconsultation** and **telemonitoring**.

- **Teleconsultation** involves real-time interaction between a patient and a licensed healthcare professional (HCP), allowing the physician to conduct an examination, issue a diagnosis, and prescribe treatment remotely.
- **Telemonitoring** refers to the continuous remote observation of a patient's health status, often for managing chronic conditions.

Crucially, the Telemedicine MD excludes medical teleconferencing from its scope, i.e. remote exchanges between multiple physicians discussing a patient's case without direct patient involvement. This distinction ensures that only patient-centered digital interactions fall within the regulatory scope of the new framework.

Data Protection and Compliance Obligations

Given the highly sensitive nature of health data, the Telemedicine MD imposes strict **data protection obligations** on both telemedicine platform operators and healthcare professionals. Specifically, Section 8 of the Telemedicine MD mandates that:

*"Both the operator of a telemedicine application and each physician providing telemedicine services, as separate data controllers, must comply with EU and national legislation on personal data protection, particularly **Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)**. Each operator of a telemedicine application must conduct a **Data Protection Impact Assessment (DPIA)** as required under Article 35 of the GDPR."*

This requirement ensures that telemedicine providers proactively assess and mitigate any privacy risks associated with processing patient data. The emphasis on DPIAs underscores the Greek government's intent to ensure robust privacy and security safeguards for digital health services.

Reimbursement for Telemedicine Services

Despite its progressive stance on regulating telemedicine, the Ministerial Decision fails to address the reimbursement of telemedicine consultations. Under Article 6(2) of the decision:

"[t]he fee for a physician conducting a telemedicine session is not reimbursed by Social Security Funds or the Greek State."

This omission raises concerns about the financial sustainability of telemedicine in Greece. While it is understood that the classification and reimbursement of telemedicine services by insurance providers is a complex issue, the very recognition of telemedicine as a medical act should inherently imply the possibility of insurance coverage.



Moreover, Directive 2011/24/EU, which Greece transposed into national law through Law 4213/2013, explicitly acknowledges the right to receive telemedicine services within the framework of cross-border healthcare. The directive's primary objective is to ensure equal access to healthcare services across EU member states, irrespective of where those services are provided.

By failing to integrate reimbursement mechanisms into the new framework, the Telemedicine MD risks limiting patient access to telemedicine, particularly for those who rely on public healthcare coverage. If telemedicine is to become a widely accessible and sustainable healthcare solution, policymakers may be required in the near future.

Conclusion

The adoption of the Telemedicine MD is a landmark development in Greece's transition to digital healthcare. By providing a structured legal framework, it offers much-needed clarity on telemedicine operations, ensures data protection compliance, and formalizes remote medical services as a recognized part of the healthcare system.

Looking ahead, the successful integration of telemedicine into routine healthcare practice will depend on the alignment of regulatory, technological, and operational factors. Continued investment in digital infrastructure, training for healthcare professionals, and public awareness will be critical in ensuring that telemedicine becomes an effective and trusted healthcare solution across Greece.

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