



CYPRUS GAMING + CASINO
SUPERVISION COMMISSION
ΑΡΧΗ ΠΑΙΓΝΙΩΝ + ΕΠΟΠΤΕΙΑΣ
ΚΑΖΙΝΟΥ ΚΥΠΡΟΥ



Κυπριακή Δημοκρατία
Republic of Cyprus

Cyprus Gaming and Casino Supervision Commission

POLICY AND PROCEDURE FOR THE DISCLOSURE OF INFORMATION UNDER THE RIGHT OF ACCESS TO INFORMATION OF PUBLIC SECTOR LAW L. 184(I)/2017

www.cgc.org.cy

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1. Introduction

1.1 The right of access to information of Public Sector Law, L/ 184(I)/2017 (the “Law”) gives the public a right of access to information held by public authorities.

1.2 Cyprus Gaming and Casino Supervision Commission (the “Commission”), as a public authority under the Law¹, recognises its responsibility and is committed to promoting transparency with all the recorded information² to meet the requirements of the Law and to ensure the equal treatment of citizens.

1.3 The Commission has the right not to disclose information if it is exempt under the Law. This can include personal or other confidential data.

2. Scope and Purpose

2.1 This policy framework has been produced to ensure Commission’s compliance with the provisions of the Law.

2.3 This policy applies to all Commission employees and to any third party acting for and on behalf of the Commission.

2.4 This policy does not apply to requests for accessing information related to personal data or information regulated by another law or information not compatible with obligations imposed by the EU or could be punished as an offence of contempt of court.

3. Publication Scheme

3.1 According to the Law³ every public authority has a duty

- (a) to adopt and maintain a scheme which relates to the publication of information by the authority and is approved by the Information Commissioner
- (b) publish information in accordance with its publication scheme
- (c) review its publication scheme on a regular basis.

3.2 The Commission has adopted its publication scheme approved by the Information Commissioner and it will be available publicly through the Commission’s website.

3.3 The Publication Scheme includes:

¹ Article 4 of the Law

² "Information" means information recorded in any form and includes any information in written, visual, audio, electronic or other physical form;

³ Article 7



- (a) The categories of information that the public authority publishes or intends to publish
- (b) The method by which any information is published or is intended to be published and
- (c) Whether the information is or is intended to be made available to the public free of charge or for a fee.

3.4 All information is provided by the Commission free of charge.

4. Making a request for information

4.1 Any natural or legal person may exercise their right to access Commission's recorded information by submitting a written application.

4.2 Before making a request, the person requesting the information must first check if the information requested is already published in the Commission's publication scheme.⁴

4.3 Requests for information not included in the Publication Scheme may be available access on receipt of a written request.

4.4 For a request to be considered valid under the Law⁵, it must:

- a) be in writing
- b) include a name and address for correspondence (postal or email address)
- c) describe the information requested.

4.5 Requests should be addressed

- i. via email to info@cgc.org.cy or
- ii. by post to: Cyprus Gaming Commission 3 Thaleias Str, 1st floor, 3011 Limassol
- iii. through submission of online form at www.cgc.org.cy/en/form.

5. Responding to a request

5.1 The Commission will respond in writing, promptly, and by the thirtieth (30th) day following receipt of the request. The Commission is entitled to request clarifications on the request and until it receives them it has no obligation to respond.

5.2 The Commission's response will confirm whether it holds or does not hold the information; if it does hold the information, in most cases, the Commission will disclose it. However, some information may be exempt from disclosure under one of the exemptions in

⁴ If the request is for information about himself such as personal data, the applicant should make a subject access request which is regulated by the relevant legislation, the GDPR.

⁵ Article 9



the Law⁶. In such a case the exception of the Law on which the decision is based and the reasons for which the exemption applies shall be provided along the response to reject the application.

5.3 The Commission reserves the right to redact any information in a document that is confidential or otherwise excludable (such as personal information).

5.4 The Commission's response shall be provided in the format requested by the person making the request.⁷

6. Responsibilities

6.1 The Commission has a responsibility to ensure the implementation of the provisions of the Law and has designated the Commission's Legal Counsel as the officer responsible for this policy.

6.2 All Commission employees are responsible for ensuring the records they manage are accurate and complete, and that all requests are handled efficiently and promptly in accordance with the Law.

6.3 All Commission employees must recognise that all recorded information may be provided to the public and that the Law requires to disclose recorded information unless the statutory exemptions apply.

6.4 All Commission employees should be aware that:

- (a) If the information provided to an applicant is defamatory then the authorities shall be released from any legal liability, unless the information was provided in bad faith.
- (b) A person commits criminal offence if:
 - i. modifies, deletes, destroys, or hides a file to conceal information
 - ii. intentionally delays or obstructs a person in the exercise of his powers under the Law
 - ii. knowingly presents forged or false information

7. Exempted Information

7.1 There are several exemptions under the Law that the Commission is not required to provide the information requested.

7.2 According to the Law, the categories of information that are exempted are (a) the absolute exemptions and (b) the non- absolute exemptions⁸. The Commission has a duty to not provide

⁶ Part III of the Law

⁷ For example, printed copy, summary or inspection, article 9(2) of the Law

⁸ Exempted categories are analysed in Part III of the Law.



information falling under the category of absolute exemptions. The criterion however for the disclosure of the non- absolute exemptions is that they will be not provided by the Commission if the public interest in not providing the information outweighs the public interest in disclosing it. In both cases the Commission is not obliged to confirm or refuse that holds the excluded information if it will result in its disclosure or if the public interest prevails.

7.3 If the requesting party is not satisfied with the Commission's handling of request, they have a statutory right to submit a complaint to the Information Commissioner⁹.

8. Records Management

8.1 The Commission will manage its records effectively and systematically to ensure information retrieval is simple, timely and meets legislative and regulatory requirements.

9. Policy Review

9.1 This policy will be updated from time to time to ensure compliance with any changes or amendments to the Law.

This policy has been approved by Commission Members on their 62nd meeting on 16th December 2020.

⁹ Article 42 of the Law