Guide to IPR Protection in China for the Gaming Industry

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1. Introduction

China’s fast-growing gaming industry enjoyed a tenfold increase in revenue between 2008 and 2017, rising from 18.6 billion RMB (2.367 billion EUR) to 203.6 billion RMB (25.9 billion EUR). Furthermore, in 2018, an estimated 620 million gamers in China generated about 266.52 billion RMB (33.9 billion EUR) in revenue, as reported by Bloomberg, making China the world’s largest gaming market. It is, thus, only natural that the fast-growing gaming industry in China attracts many European SMEs wishing to expand to new markets. While China’s gaming market can offer business opportunities, intellectual property rights (IPR) infringements still pose challenges to many SMEs entering China’s market.

IPR infringements in the gaming industry can result in considerable financial losses to game developers. Typical infringement acts include, but are not limited to piracy, game cloning, unauthorized use of trademarks, unauthorized use or adaptation of works and unauthorized live streams. These various patterns of infringements further highlight the need for a comprehensive IP strategy for the SMEs before entering China’s market. A well-designed IP protection strategy can often make the difference of whether a company succeeds or fails at the highly competitive gaming market.

This guide is for European SMEs active in the gaming industry, providing an overview of IP protection related to games and game developing. It helps SMEs understand the legal issues concerning IP protection, they may encounter when seeking success in China and gives practical tips on designing a comprehensive IP strategy.
Copyright Protection

Overview

Copyright is the most important mean of IP protection for the majority of game developers. Copyright arises automatically upon completion of the creative work i.e. the game. It easily qualifies as the best method to protect the IP associated with games, as it covers both the tools used to develop games, as well as the content of games.

The principal copyright legislation in China is the Copyright Law of the People’s Republic of China (April 1, 2010). Furthermore, China is a signatory to the Berne Convention (1971 Paris Act), the Universal Copyright Conventions (Geneva and Paris), TRIPS, and the WIPO Copyright Treaty, bringing China’s copyright protection in line with international standards.

The Berne Convention stipulates that copyright must be granted automatically without the need for any “formality”. The Convention guarantees that works shall be protected in countries other than the author’s country of origin to the same degree as the foreign country protects works of its own national authors. Accordingly, owners of foreign works may bring an action for copyright infringement in Chinese courts without having obtained a registration from the Copyright Protection Centre of China (CPCC), which is administered by the National Copyright Administration of China (NCA). However, as copyright enforcement can be easier and faster when SMEs have registered their copyright in China, it is suggested for European SMEs to register copyrights with the CPCC. For more information on copyright registration, please see our guide on How to File a Copyright Registration in China: https://www.china-iprhelpdesk.eu/sites/china-hd/files/public/v8_How_to_Register_Copyright.pdf

Mandatory Game Licensing

The General Administration of Press and Publication (GAPP), also known as the NCA, supervises the administration of copyrights. The Regulations on the Online Publishing Services Administration (OPS) is the primary administrative regulation in the field of game publishing. The OPS rules clearly stipulate that internet information service providers who create digital works that are publicly available on the internet are required to obtain an online publishing service license (Publishing License) from GAPP. These digital works include books, newspapers, audio visual products and video games.1

The OPS rules strictly regulate foreign-invested enterprises, including wholly foreign-owned enterprises and joint ventures.2 Critically, OPS rules stipulate that foreign-invested enterprises are prohibited from independently publishing their work in China; this includes game publication. Due to this strict requirement, foreign game developers intending to launch a game in China have to license games with a qualified and licensed domestic Chinese game operator3. Only then will the game obtain necessary approvals to be distributed in China. Each game licensing agreement between a Chinese entity and a foreign-invested entity must be reported to and approved by GAPP.

SMEs should pay attention to the fact that copyright law does not regulate contractual issues, including performance obligations, payment terms, terms of use and limitations on use. It is recommended for Europeans SMEs to impose these contractual restrictions on the partner companies in game licensing agreements.

Although, licensing games to domestic entities is currently the only way to legally distribute games in China, these restrictions on foreign ownership of online publishing are expected to be relaxed in specific pilot areas. For example, the Beijing Municipal Commerce Bureau unveiled a Three-Year Action Plan from 2019 to 2022 to further open the city’s service industry to foreign investments. The action plan foresees measures to open value-added telecommunications and internet business for foreign investors, such as streaming

1 Between March 2018 and December 2018 China temporarily froze all game license approvals (foreign and domestic alike). While no official reasons were given to the temporary freeze, issues like concern over children’s health have ben referenced. In the meantime, China has issued new stricter rules for the online gaming industry in April 2019.
2 China’s Foreign Investment Law (FIL), was published on March 15th, 2019. The FIL provides that the organizational form of “wholly foreign-owned enterprise” or “joint venture” shall not be a legal form available in China any more. The FIL allows these currently existing enterprises to continue holding their current structure 5 years from when the law comes into effect. These enterprises would have to make changes to the governing structure within six months after the five-year transitional period deadline (January 1, 2025). Implemening regulations are expected to be published to provide for the process of conversion of legal structure for these enterprises.
3 “Game operator” refers to a company that digitally distributes games, and which generally handles the promotion of the game, the hosting of the game’s servers, and the provision of customer service to the game’s users.
services, video games, online publishing, and video streaming. Even though partnering with a Chinese game publisher may not be mandatory in the future, there are still benefits for foreign game developers in working with a partner company that has experience in China. Partner companies can help with distributing the game in China: a game publisher typically provides marketing support and promotion, and can sometimes secure exclusive distribution rights for a certain region.

What Can Be Protected by Copyright?

Under article 3 of PRC Copyright Law, “works” shall include literature, art, natural science, social science, engineering technology and the like, which are expressed in the following categories of copyright: (1) written works; (2) oral works; (3) musical, dramatic, opera, choreographic and acrobatic works; (4) works of fine art and architecture; (5) photographic works; (6) cinematographic works and works created by virtue of an analogous method of film production; (7) drawings of engineering designs, and product designs; maps, sketches and other graphic works and model works; (8) computer software; (9) other works as provided for in laws and administrative regulations. Although PRC Copyright Law does not specifically refer to digital games, copyright safeguards their creative and artistic expression.

Case study

Can the rules of the game be protected in China?

For a long time, there had been a controversy on whether the ‘rules of the game’ (i.e. rules which govern how a game is played; for example, a chess bishop can only move diagonally) could be protected under copyright law. Judicial practice did not give conclusions on the controversial issue until a typical case came out in 2018. This was the first case in the gaming industry directly claiming copyright protection for game rules, and the case was successful.

“Taichi Panda” is an A-RPG (Action Role Playing Game) mobile game, developed and operated by Suzhou Snail Digital Technology Co., Ltd. In 2018, “Taichi Panda” right holder claimed that another mobile game “Hua Qian Gu” copied their numerical settings, game rules, UI interface and core parameters. They filed a claim against “Hua Qian Gu” operators in the Suzhou Intermediate People’s Court. As a result, the defendant was ordered to apologize via national newspaper, and pay compensation for the plaintiff’s economic loss of 30 million RMB (3.85 million EUR).

Lessons learnt:

• Game elements could be seen as complex works of authorship, potentially composed of multiple copyrighted works. These include the most common types of copyrights in relation to games such as written works, musical works, photographic works, audiovisual works and computer software. For example, the underlying code can be protected as computer programs and related files, the story and sound can be protected as an audiovisual work, and game props may constitute photographic works. The overall running picture of a game could be protected as a film. SMEs need a comprehensive approach to all 9 categories of copyrights listed above to address various issues.

• The originality requirement under PRC copyright law is minimal. There has only been a small number of cases where the Chinese courts have ruled computer programs to be insufficiently original to be eligible for copyright protection. While the originality standard is low, it does exist. The court only recognizes game rules as a protectable original work if they are a specific expression of rules, rather than just general descriptions.

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3. Trademark Protection

Overview

A successful trademark is one that allows consumers to immediately identify a company and its products. Trademark, thus, serves the purpose of brand awareness and instant association with a particular company. Trademarks can be regarded as the second most important type of intellectual property to protect in the game industry after the copyright, because a good trademark can make the company and its games a distinct brand in the eyes of consumers.

The primary trademark legislation in China is the Trademark Law of the People’s Republic of China. It sets out the basic rules governing registration, infringement standards and the penalties for infringement.

Trademark Application

Only registered trade and service marks are protected in China (except for “well-known” trademarks). An SME must either directly file an application with the Trademark Office (TMO) of China, at the National Intellectual Property Administration (CNIPA), or file the application through the World Intellectual Property Organization (WIPO) using the Madrid Protocol filing route. If choosing the latter, the trademark application must be based in the country where the mark is currently registered.

In China, exclusive rights are conferred on the owners of a well-known trademark. Well-known trademark is not defined in the Trademark Law, so each case is determined by the courts or by the TMO. Foreign brands, especially those of the SMEs, rarely qualify as well-known trademarks in China, because they rarely reach the scale of recognition in China comparable to local brands which enjoy more visibility. Thus, European SMEs should not rely on the exclusive rights of well-known trademarks and register their trademark in China.

China follows the International Classifications of Commodities and Services for Trademark Registration (the so-called Nice classification). It should, however, be mentioned that China has adopted a new 2019 version of the classification table: SMEs should therefore check the new table prior to submitting trademark registration application to make sure their applications are correct.

The following list gives some examples of classes most relevant for trademark application in the gaming industry:

- Class 9 – computer game software etc.
- Class 41 – game services provided online from a computer network etc.
- Class 42 – computer software design etc.
- Class 28 – apparatus for games etc.

Before European SMEs file a trademark registration application in China, they should check whether the trademark is available and has not been previously registered by another company, or whether it is too similar to any other registered trademarks. A trademark search can be conducted on the TMO online database (http://wsjs.saic.gov.cn/) which records all trademarks applied for and registered in China.
The database is available in English and is free to use for everyone. The information provided is only for reference as the system’s data is not updated in real-time, and there may be some time lag.

**What Can Be Protected by Trademark?**

Any visual sign, which can be used to distinguish a natural person’s, entities’ or any other organization’s goods or services from other organizations’ goods or services can be protected by trademark. This can include any text, design, letters, numbers, three-dimensional symbols or combined colours and combinations. If the following requirements are met, an IP owner can apply for trademark registration:

- The trademark application must not be identical or similar to the name or flag of a State, the Red Cross or other international organisations; must not have discriminative content against a nationality or consist in exaggerated and fraudulent advertising etc.
- The trademark application must be distinctive, unless proven to be easily distinguishable and acquired distinctiveness through practical use. It must not be functional, such that registration can be denied if a trademark application originates only from the nature of the goods/services, i.e. a trademark that is simply a model of the product itself. For example, it is not possible to register a trademark under the name “The Game” as it is too descriptive of the goods/services provided.
- When the registration of a trademark is identical with or similar to another trademark that has, in respect of the same or similar goods, been registered or, after examination, preliminarily approved, the TMO shall refuse the application and shall not publish the said trademark.
- Trademarks that may have a negative effect on social morality or may cause other negative social influence shall be prohibited from use or registration. For example, Blizzard Entertainment applied to register “StarCraft: Ghost” as an e-sports brand, however it got rejected since the meaning of “Ghost” stands in contrast to “socialist morality” and would promote “feudal superstition”.

**Overview**

There are three types of patents in China: invention patents, utility model patents, and design patents. They give the owners the right to prevent others from using the patented material for a limited length of time.

Patents in China are granted by the CNIPA. Applicants whose applications are rejected may file a request for reexamination with the CNIPA Reexamination and Invalidation Department. Applicants can further appeal the reexamination decision to the Beijing IP Court in the first instance, and to the newly-established IP tribunal of the Supreme People’s Court in the second instance.

- Invention patent refers to new technology solutions related to products, processes or improvements thereof;
- Utility model refers to new technology solutions that being suitable for practical use in terms of the shape, structure or a combination thereof;
- Design refers to the new design of a product that is related to the shape, pattern or combination of the two, or a combination of colour and shape or pattern, which is aesthetically pleasing and suitable for industrial applications.

Invention patents go through substantial examination, whereas utility model patents and design patents are only subject to a formality examination. Utility models and design patents offer protection for only 10 years compared with 20 years for an invention patent.

**Patent Application**

There are three methods for obtaining patent protection in China:

1) Directly file a patent application to the patent office of CNIPA;
2) File a patent application first in EU Member States, and then file a second patent application in China within one year (six months for design patents);

The choice is usually based on a commercial strategy, and balanced by cost considerations. To be able to apply for a patent at CNIPA, European SMEs must appoint a Chinese patent agent. Applications to CNIPA must be translated into Chinese. European SMEs need to first conduct a confidentiality review in the CNIPA, and then apply for the patent application to other countries or regions.
For SMEs who first choose to file a patent application in the EU Member States, and then claim the priority under Paris Convention, the application process is usually much faster. The downside of this method is that the preparation time is shorter, because the applicant must prepare documents for the second applications within a short period of 12 months (invention or utility model) / 6 months (design). If the game is in danger of being infringed in China, it is recommended for the SMEs to use the Paris Convention application route.

Through the PCT route, it is possible to seek simultaneous patent protection for an invention or a utility model patent in several countries by filing a single "international" patent application instead of filing separate national applications. Applicants only need to submit a PCT application to the IP Office in either English, French, German, Spanish, Russian, Japanese, Chinese, or Arabic. Applicants can go into the national phase within 30 months from the date of filing, which is longer than the 12 months under the Paris Convention. Also, PCT applications can be terminated by applicants to avoid marginal cost on some applications that may be invalid.

**What Can Be Patented?**

There are three basic requirements for invention and utility model patents: (1) novelty, (2) inventiveness and (3) industrial applicability.

- **Novelty** means that before filing a patent application, or before its date of priority, no invention or utility model shall be made known to the public.

- **Inventiveness** means that the invention has prominent substantive features and represents notable progress as compared with the prior invention; and utility model has substantive features and represents progress.

- **Industrial applicability** means that the patent can be made or used in a certain industry.

For design patents, a patentable design must: 1) significantly differ from prior designs or a combination of prior design features, and 2) not conflict with any other party's legitimate rights obtained before the filing date.

Patent applications in the field of game industry mainly occur in the following areas: hardware, image processing, friend system, human-computer interaction, data management, and payment systems. In China, Tencent and NetEase have filed more than 300 patent applications in relation to games, involving invention and design patent applications.

The graphical user interfaces (GUIs) in a game can be protected as a design patent in many countries, such as the US, EU Member States and South Korea. In China, however, GUIs have only been protected since 2014. According to the official Patent Examination Guidelines in China, there are limitations on what types of GUIs may be registered as designs. GUIs may only be patented when incorporated into a product. This means game interfaces, graphic and text layout of a webpage and patterns on a display device that are irrelevant to users' interaction (such as a wallpaper or a startup/power-off picture), are all excluded from patenting. Interface design is protected in China as part of the overall design of the product. For example, Konami Holdings Corporation, a Japanese entertainment and gambling conglomerate, operates as a product distributor, video game developer and publisher company. Konami once applied design patents successfully on the “Game Machine Screen” in China, attaching a GUI to an electronic product (patent number: CN200830249338.6).

In judicial practice, there is still no patent infringement lawsuit relating to the game industry. However, it is foreseeable that with current rates of industry growth, growing market interests will inevitably push the major game developers to use patents more frequently.

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4 Friend system is a social feature that allows the player to interact with friends in a game.
5. **Protection through Anti-Unfair Competition**

**Overview**

Under the Anti-Unfair Competition Law ("AUCL") in China, an act of unfair competition is constituted when during production or distribution activities, a business operator disrupts the market competition order or infringes the legal rights and interests of other business operators or consumers. The AUCL mainly involves four types of activities in the gaming industry:

- Infringement of trade secrets;
- using without permission a mark that is identical with or similar to product names, or similar to packaging or decoration of others with a certain degree of influence;
- misleading promotional activities, including unscrupulous promotional tactics prevalent in online marketing;
- other types of infringements, which may have no remedies under copyright, trademark and patent laws and regulations.

Unfair competition acts cover actions that are often similar to common IPR infringements. For example, trademark infringement may occur when the company appropriates the use of similar symbols, words or phrases with the aim of directing the original company's customers or clients away from the original brand towards the infringing brand. At such a stage, competition becomes unfair because one of the parties has obtained an advantage through fraud or dishonesty. In order to maximise chances for a favourable judgment at court, the plaintiff often puts the case of copyright infringement, trademark infringement and unfair competition in the same lawsuit. The purpose of this is to demonstrate and strengthen the infringement from multiple angles to provide more legal basis for the court, in the hope of receiving higher compensation.

**Case study**

The plaintiff Blizzard Entertainment Limited ("Blizzard"), a famous game developer and publisher, has launched a number of best-selling games including "Hearthstone". The co-plaintiff Shanghai NetEase Network Technology Development Co., Ltd. (hereinafter referred to as "NetEase Company") was authorized by Blizzard to distribute "Hearthstone" within China. The game's release was widely reported by domestic and foreign media and became very popular in China. In October 2013, the defendant Shanghai Youyi Network Technology Co., Ltd. (hereinafter referred to as "Youyi Company") released an online game called "The Legend of Wolong: The Legend of the Three Kingdoms".

The plaintiff (Blizzard) claimed "The Legend of Wolong" game plagiarized and used the decorating design and other game elements (including game representation, battle scene, 382 cards and deck combinations) resembling the game rules of "Hearthstone". As a result, the defendant (Youyi Company) was ordered to compensate Blizzard a total of 6 million RMB.

It is worth noting that, although Blizzard lost two copyright claims on game rules, it eventually won the lawsuit due to its claim under the anti-unfair competition law. The courts often rule that the accused defendants are responsible for their unfair competition activities, or in violation of good faith principle, if the game elements being copied are not protected or cannot be sufficiently protected under the relevant intellectual property laws. Anti-Unfair Competition Law is particularly useful where the defendant is found to make false or misleading publicity about its game or tries to "free ride" on the fame of plaintiff's games, brands, and images, or otherwise confuse the public.

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5 (2014) Hu Yi Zhong Min Wu (Zhi) Chu Zi No. 23
6 "Free rider" refers to the act of getting an advantage from another's work without earning or paying for it.
6. Enforcement

Cease-and-Desist (C&D) letters

C&D letters may be the first step in enforcing one’s rights in China, as they are a cost-effective alternative to other means of enforcement. C&D letters are usually sent by lawyers to notify and to request the counterparties to cease infringement and to apologize by showing relevant IP rights. However, the infringer can easily disregard these letters. This means the IP owner may have to use other possible legal routes to secure their IP.

Notice and take-down procedures

Notice and take-down is a process operated by online hosts in response to allegations of illegal content. Content is normally removed by the host following the receipt of the notice. As important distribution channels for many games and software, Google Play and Apple App Store had gradually become an important way to protect IP rights of games. For example, Blizzard Entertainment and Valve have teamed up to take down the “DOTA” (a popular game) copycat games through the App Store as a pre-litigation strategy. If European SMEs believe that an application in the App Store violates IP rights, then they can fill out the form and submit a claim to the App Store Legal Team. Guides for doing this are usually available on the hosts’ website/app.

Administrative action

Generally, an IPR owner may file a complaint with relevant local enforcement authorities. European SMEs can dial the IPR legal aids and complaints hotline at “12315”, or register their complaint at the National Platform of Consumer Dispute Resolution (http://www.12315.cn/cuser/portal/jbcase/corperation). The State Administration for Market Regulation (SAMR) will handle the complaints on this hotline and website.

Except for receiving complaints, administrative authorities are empowered to take a range of investigative actions proactively, and impose administrative fines on infringers. For example, “Sword Net Action” is an administrative action held once a year to combat copyright infringement. In 2017, Chinese games company Duo Wan was fined 270,000 RMB (34,989.72 EUR) for infringing Swedish game Minecraft.

Civil lawsuit

If the C&D Letters, notice and take-down procedures or administrative actions cannot stop the infringing acts effectively, it is advisable for the game developers to collect evidence properly and take further actions. One option is filing a lawsuit based on the extent of the infringement. General procedures for first instance case in China include filing and acceptance of lawsuits, pre-trial preparation, hearing, and judgments or rulings, with a timeframe of 6 months, extendable with the approval of the court. Chinese courts can award damages and may order interlocutory asset and evidence preservation orders.

According to the Civil Procedure Law in China, foreign enterprises and organizations filing a lawsuit or countersuit with a Chinese court that are required to entrust a lawyer to participate in proceedings shall entrust a qualified Chinese lawyer. If SMEs do not have a domicile in China, they shall provide notarized documents proving corporate identities. If SMEs do have an office in China, they shall submit a notarized Power of Attorney.

Criminal sanction

Criminal proceedings are also available for IPR holders to enforce their rights in China. Public Security Bureaus (“PSB”) are usually the relevant agencies that conducts criminal investigations. If infringements reach certain monetary thresholds that constitute criminal offences, the case can be transferred to the Procuratorate and then forwarded to prosecution before the People’s Court. For example, according to the Criminal Law and related Judicial interpretations, whoever knowingly sells commodities bearing counterfeited registered trademarks, if the amount of sales is more than 50,000 RMB (6,479.58 EUR), they shall be fined for committing the crime of selling commodities bearing counterfeited registered trademarks, and shall also be sentenced to fixed-term imprisonment of not more than three years of criminal detention. If the amount of sales is more than 250, 000 RMB (32,361.08 EUR), they shall be sentenced to fixed-term imprisonment of not less than three years and not more than seven years.
The gaming sector in China represents a lucrative market for European SMEs wishing to internationalise. There are a multitude of challenges and opportunities arising from the business environment. Since Intellectual property (IP) infringement in this industry can result in considerable financial losses, IP protection is critical to the development of your company in China.

Under the current law, licensing games to domestic entities is the only way for foreign-invested companies to publish games in China.

7. Take away messages

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Since copyright law does not regulate contractual issues, including performance obligations, payment terms, terms of use and limitations on use, it is recommended for Europeans SMEs to impose these contractual restrictions on the partner companies in game licensing agreements.

- Before European SMEs apply to register their trademarks in China, they should check whether the trademark is available and has not been previously registered by another company, or whether it is too similar to any other registered trademark. European SMEs should also consider whether the trademark has adverse effects, such as whether it involves religion or would otherwise “cause damage to morality”.

- Inventions and design patents applications are the main patent types used in this industry, while GUIs may only be patented when incorporated into a product.

- IPR enforcement in the gaming industry can be complicated in China. A combination of various claims and enforcement measures is usually the most effective way to secure intellectual property rights. To employ the most effective enforcement strategy, SMEs should consult with an experienced local lawyer.
The China IPR SME Helpdesk provides free, confidential, business-focused advice relating to China IPR to European Small and Medium Enterprises (SMEs).

HELPLINE Submit further questions to the Helpdesk via phone, email (question@china-iprhelpdesk.eu) or in person and receive free and confidential first-line advice within three working days from a China IP expert.

TRAINING The Helpdesk arranges training on China IPR protection and enforcement across Europe and China, tailored to the needs of SMEs.

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Prepared by:


The language offer will depend on the specific service and experts’ availability.

If you have any queries on how to protect your Intellectual Property in China contact our Helpdesk service:

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