Operations guide to report the CNMV the full register of information of ICT service providers according to DORA Regulation

12 February 2026

1. Introduction and applicable legislation

Financial institutions subject to DORA, in accordance with section 3 of article 28 of Regulation (EU) 2022/2554 (on digital operational resilience or DORA), shall make available to their competent authority upon request the complete register of information with all contractual agreements on the use of ICT services provided by third-party ICT service providers. The content of the register of information on providers must follow the standard templates published in the Implementing Regulation (EU) 2024/2956.

The CNMV has adopted the Joint Guidelines on supervisory cooperation and on the exchange of information between the ESAs and competent authorities (In particular guideline 5.1). In order to comply with the timeline announced by the ESAs on the registration of information, in 2025 financial institutions must send their registration to the CNMV **between March 1 and 22, 2026** (resubmissions can be made until April 22, 2026), with the reference date of the information being December 31, 2025.

To send said report to the CNMV, financial institutions must follow the instructions described below. For the following years, the CNMV is implementing a system for reporting said records through its Virtual Office.

2. Procedure for reporting the registry

The procedure for reporting the information registry in 2026 is as follows:

1. The entity must download the following template "**PlantillaRegistroInformacion_v_2_0.xlsx**", in Excel format, with the information to be filled out (see the following section with additional instructions), downloadable within a ZIP file with help material (in Spanish):

https://www.cnmv.es/DocPortal/Ciberseguridad/materialAyudaROI_2026.zip

2. The entity will send the report through the CNMV Virtual Office in the "**Zona Cifradoc**" area: https://sede.cnmv.gob.es/SedeCNMV/SedeElectronica.aspx?lang=en

using the procedure: "**ZZZ - Envío de un documento con formato libre**", taking into account the following requirements when filling in the fields:

- Departamento de la CNMV a la que se dirige el trámite: *ESTRATEGIA, INNOVACIÓN Y FINANZAS SOSTENIBLES*

- Asunto: *DORA, reporte del registro de proveedores de servicios TIC*

- Expone: Indicate the entity's details (name and CIF) (the contact information, email address, provided in the template will be used to receive information about the report.).

- Attach the following document: an Excel file with the completed template (the previous template used in 2025 will not be accepted).

- Alternatively, if the entity's data is included in the consolidated report of another entity that will be reporting to an authority, you must provide the following information: the name and LEI code of the entity submitting the consolidated report and the authority to which it is being submitted. In this case, it is not necessary to send the Excel file with the entity's individual report.

    3. The CNMV will respond to the contact information provided in the template with a response regarding the quality of the submitted data (the response is not immediate, as it undergoes several non-automated validation processes).

3. Additional instructions for preparing the report:

We recommend reviewing the support materials published by the CNMV. These include, in addition to the template (in Spanish):

- A document outlining the changes in this year's report compared to last year's.

- Documentation on the CNMV's testing environment for validating the registration before submitting it electronically.

- A document with frequently asked questions regarding the register of information.

- Two examples with the completed template and fictitious scenarios.

- Three presentations with audio explaining the content, technical aspects of the registration, and instructions on using the CNMV template.

For the EBA validation response section (the platform used to share the registers with the ESAs), please refer to the following website:

https://www.eba.europa.eu/activities/direct-supervision-and-oversight/digital-operational-resilience-act/preparation-dora-application

You must avoid rejection of the submitted data by complying with the validation rules, among others:

- Fill in the mandatory fields.

- Do not repeat the primary keys in different rows.

- Foreign keys must refer to existing primary keys.

- Follow the formatting of each field type (date, numeric, percentage, etc.). In the case of a drop-down list, use the possible values provided by the EBA.

- If you have migrated data from the previous template, ensure you do not overwrite the cell formatting (paste unformatted values; for example, for dates, keep yyyy-mm-dd).

The European Commission's response to a consultation related to the definition of ICT Services under DORA must be taken into account.

Greater efforts should be made by those ICT service providers that support essential and important functions of the entity.

If you have any questions, send your query to the CNMV cybersecurity mailbox: ciberseguridad@cnmv.es and consult the cybersecurity section on the web portal:

https://www.cnmv.es/Portal/ciberseguridad?lang=en