



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

20 February 2025

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 April 1 and 22, 2025**, with the [reference date of the information being March 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 2025 is as follows:

1. The entity must download the following template, in Excel format, with the information to be filled out (see the following section with additional instructions):

https://cnmv.es/DocPortal/Ciberseguridad/PlantillaRegistroInformacion4_o.xlsx

2. The previous template must be converted into a ZIP package following the EBA instructions, generating the csv and json files in the specified structure. The file name must follow the indicated specification (CON or IND depending on whether it is an individual or consolidated report).
3. 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) and contact details (name and email) to receive information about the report.

Additionally, indicate in the “Expone” field or as an attached file, the limitations, if any, on the information in the register sent (e.g. the provider does not have or has not provided the entity with an identification code, so the code presented is fictitious).

- Anexar documento: .ZIP file with the report indicated in the previous step.
4. The CNMV will respond to the contact indicated in step 3 with a feedback response on the quality of the data sent (either rejection: NOK, pending further validation: PEN, or the results of the validation: RES).

3. Additional instructions for preparing the report:

The European Banking Authority (EBA) has published [technical indications on the register](#). We highlight the following information:

- The data model of the record, with the dependencies between the templates, the types of data, the main and foreign keys and whether they allow empty/null fields.
- The possible values of the drop-down fields and the licensed activities.
- A [sample template](#) (it has been included in another zip for technical reasons).
- Technical validations and codes to be used in feedback responses.
- Questions and answers about the registration report.
- Summary report of the previous ‘Dry Run’ simulation. It includes the lessons learned for the entities (follow the instructions, fill in the mandatory fields, use the unique identifiers to avoid rejections, etc.).

You must avoid rejection of the data sent 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.
- Respect the format of each type of field (date, numeric type, percentage, etc.), in the case of a drop-down list, using the possible values offered by the EBA.

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>