Q&A DORA Register of Information

My question is not listed here — how can I contact the AFM?

If your question is not answered in the Q&A below, please contact DORA@afm.nl.
Many answers can also be found on the EBA website in the FAQ and in the Key Common Issues Identified.

What is the purpose of submitting the registers of information / what do you do with the data?

The AFM forwards the submitted registers of information unchanged to the European supervisory authorities.The aggregated registers provide insight into chain and concentration risks in the financial sector. This data is then used, among other things, for the designation of critical ICT third-party service providers (CTPPs).

In November 2025, the ESAs published the first list of 19 critical ICT service providers; these fall under the DORA oversight framework.

Additionally, the AFM uses the submitted data for its data-driven and risk-based supervision.

How does the process of submitting registers of information to the AFM work?

Firms can submit their registers of information through the reporting obligation in the AFM portal.We will then forward them to the EBA, which checks whether the file meets all requirements. If errors arise, we will relay the EBA feedback through the AFM portal (you can find the feedback as a .txt file in the reporting obligation).
The reporting obligation will be reopened once the feedback has been uploaded.

How quickly can I expect feedback?

From March 2026, feedback will normally be available on the AFM portal within 1 working day; in exceptional cases, within 2 days. If it takes longer, please contact dora@afm.nl.

How often may I submit?

You may submit as often as you like. After the register is uploaded to the AFM portal, it may take a few days before we receive the EBA feedback. Once we have received the feedback, we reopen the submission so that a new submission can be made.

When resubmitting the register of information, it is important that the file has a different name than your previous submissions. You can do this by adjusting the final digits of the file name (timestamp).

What is the final submission date for the register of information?

The first submission must be completed no later than 31 March 2026 in the AFM portal. Corrections of submitted registers to improve data quality (resubmissions) are welcome until 30 April.

Can this be made more efficient?

The AFM is aware of the impact of this European legislation on the market and, together with DNB, seeks to limit supervisory burden. We support proposals that reduce workload for the sector.

Can I submit the register of information via Excel?

No. In 2026, registers of information must be submitted to the AFM in xBRL-CSV format. Excel is not accepted. In 2025, the AFM performerd the conversion to xBRL-CSV, but this was a one-time service. In preparing for the 2026 submission, the AFM made a careful assessment between supporting the market again and managing supervisory costs.

Which converter does the AFM recommend?

The AFM is neutral and does not recommend specific providers. We see both paid and (free) open-source tools on the market. We recommend using tooling that performs proper data-quality checks and validating what the provider does with your data.

Further points to consider:

- not all XBRL converters are suitable for the registers of information — the converter must be able to create xBRL-CSV (not iXBRL!);

- check whether the converter supports the EBA taxonomy;

- the xBRL-CSV file must meet several requirements — examples are provided on the EBA website.

Can I resubmit last year's submission?

Submitting the 2025 version will likely result in error messages. You may, however, use the 2025 submission as a basis for the 2026 submission.

Which error codes occur most frequently?

Name conventions, folder structure, keys, mandatory fields, technical values for choice fields.

Naming convention:

The European supervisors expect the file to follow this naming convention:
DUMMYLEI123456789012.IND_NL_DORA010100_DORA_2025-12-31_YYYYMMDDHHMMSSsss

Files that do not meet this naming convention are not accepted in the AFM portal.
The files must also be delivered in a zipped folder. Both the **ZIP file name** and the underlying folder must follow this naming convention.

<u>Key fields:</u>

The most common rejection is **FK violation (error 807)**: you refer to a key that does not exist in the source table (including self-references).
Check referential integrity before upload. Tooling can help.

Use exactly the key values (primary keys) prescribed in the data model (see annotated layout + DPM dictionary).

<u>Selection fields</u>

Always enter **technical codes** (e.g., *eba_CO:x1* for arrangement type, or codes for currencies/countries) and not label text.
Check the "List of possible values for all data fields with drop-downs" and the annotated table layout.

How should we deal with subcontractors / intra-group outsourcing?

Intra-group outsourcing must be included in the register in the same way as any other outsourcing.

For subcontractors: assess whether security or continuity of the service would be compromised if the subcontractor were unavailable.
If the answer is yes, then it must also be included in the register of information.

Which contracting parties must be included in the register of information?

All contractual agreements with third-party providers of ICT services must be included.

The definition of ICT services in DORA is very broad, meaning something may quickly qualify as an ICT service.

Which validation rules apply?

Validation is performed by the EBA. It applies the [DORA Data Point Model (DPM).](#)
Additionally, there is a Q&A in which certain rules are included.

How should we proceed if a party does not have an LEI code?

If your ICT service provider does not yet have an LEI or EUID, you must enter another available identification number. You may choose from:

- LEI or EUID for legal persons;

- KVK or equivalent number / tax number / passport number for natural persons;

- For legal persons without LEI or EUID, you may use another identification number. This will be marked as a data-quality issue, but the register will **not** be rejected.

In table B.02.02, a location must be entered for data storage and processing. Can I enter "EU" if the contract does not specify a location?

No, you may only enter one of the available options.When the country of storage/processing is unknown, you may choose the country that is most likely. As long as one of the available options is chosen, this will not affect acceptance. Leaving the field empty will cause a rejection. If no data storage takes place, you may choose "not applicable."

The feedback I received cannot be explained by the ITS. How is that possible?

The registers of information are validated by the EBA, the starting point here is that the FAQ is leading, followed by the DORA Data Point Model and lastly the ITS. It may occur that the FAQ and the Data Model do not correspond with the ITS; in such cases the first two prevail.

The third-party ICT risk management framework of DORA and the obligation for the Register of Information apply to ICT services that support the execution of the business functions of a financial entity. Digital advertising platforms, such as Meta Ads, Google Ads, LinkedIn Campaign Manager and TikTok for Business, are used by many financial entities primarily for marketing and customer acquisition purposes.
Question: Can the AFM clarify whether contractual agreements with such advertising platforms fall within the scope of DORA's ICT third-party risk framework? And specifically: does the answer change when the financial entity has a deeper technical integration with these platforms, for example through conversion-tracking APIs, the uploading of customer data for audience selection, or tracking pixels embedded in the entity's own digital channels?

Financial entities must include all third-party ICT service providers with whom a contract has been concluded in the register of information. This includes digital advertising platforms.

B_06.01: the function identifier cannot be repeated for different licensed activities. If the function is used for multiple activities, how should this be reported?

In that case, a new function identifier must be created. For each combination of LEI (B_06.01.0040), function (B_06.01.0030) and licensed activity (B_06.01.0020), a unique function identifier must be created.

How should we deal with providers that we believe are no longer in scope of DORA? Which end date should be entered? Why does the field exist if only active contracts must be reported?

ICT service providers do not need to be included once the contract has ended.
The end-date field (B_02.02.0080) must be filled in if the contract has a predetermined end date. If the contract has no end date, enter 9999-12-31.

Field B03.01.0030: last year this had to be left blank in the AFM Excel file, but the EBA example shows "true." Should we follow the EBA example?

Field B_03.01.0030 was created last year solely for the AFM's Excel-to-xBRL-CSV conversion. This field is not required under the ITS, FAQ, or DORA data model and therefore does not need to be reported in 2026.

We miss a materiality threshold in DORA regarding inclusion of ICT providers. Is there any flexibility for very small, non-material parties?

The AFM (together with DNB) participates in several European working groups in which the annual request for the register of information is evaluated. We share signals we receive from the sector in these groups, including questions about proportionality.

Are the technical requirements according to the EBA website leading? If my report is 100% in accordance with the framework and the example XBRL-CSV on the EBA website, may I assume that the AFM will accept my report?

The AFM is not the supervisor that accepts the report. The European supervisors validate the register of information and accept it. The technical requirements of the EBA website are leading in this. The only validation the AFM performs upon submission is whether the LEI code of the reporting entity corresponds with what is in our system and a check of the naming convention. If the LEI code is not correct, we ask you to contact DORA@afm.nl.

Has the Data Point Model been updated based on last year's evaluation?

No, no changes have been made to the DPM compared to last year.

Is it correct that free services do not need to be included in the register of information?

All contractual agreements with third-party ICT service providers must be included.
If you have no contractual agreement (because the service is free), it does not need to be included.