

Submission Date

06/11/2024

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Status: Question Rejected

Additional Information

Level 1 Regulation

Regulation (EU) 2022/2554 - The Digital Operational Resilience Act (DORA)

Topic

Other DORA topics

Subject Matter

Regulation (EU) 2022/2554 - The Digital Operational Resilience Act (DORA)

Question

We have service providers (Market Axess), who classify themselves as DORA-relevant because they offer regulated financial services (ARM and APA). However, they do not see themselves obligated to make contractual adjustments according to Article 30. This is because "financial services" would not fall under the definition of "ICT service" as per Article 3(21) of DORA. Additionally, this requirement would only apply to non-regulated companies.

Is this understanding correct?