ESMA_QA_2847

Submission Date
15/05/2026

Status: Question Rejected

Additional Information

Level 1 Regulation
Regulation (EU) 2022/2554 - The Digital Operational Resilience Act (DORA)

Topic
Other DORA topics

Subject Matter
conclusion of ICT arrangement for the purpose of tests

Question
In certain scenarios, a financial entity may enter into an arrangement with an ICT third-party service provider solely for testing purposes. These tests typically span several weeks, during which digital service is delivered through ICT systems on an ongoing basis, however to no internal or external users. Furthermore, digital service provided by the ICT third-party service provider is not supporting any function of financial entity, and the testing process itself has no

operational impact on the entity's current standing or infrastructure.
Question:
1. Is the financial entity required to notify in a timely manner about any planned contractual arrangement the competent authorities of an arrangement concluded strictly for testing purposes, if it is anticipated that—upon successful completion—the digital service will eventually support a critical or important function?
2. What is the exact date which shall be used in the register of information if the tests will be succesfull and the digital service will be offered to one or more internal or external users? Should this date correspond to the initial commencement of the testing phase or the formal launch of the service in the production environment?