

EBA RegTech Industry Survey - Financial institutions

Fields marked with * are mandatory.

Introduction and instructions

In line with the EBA's work programme on financial innovation, the EBA is currently performing an analysis in the area of RegTech with the aim to better understand the ongoing activity and raise awareness within the regulatory and supervisory community. In parallel, the EBA is seeking to identify ways to facilitate the adoption and scale up of RegTech solutions across the EU whilst acknowledging and addressing the underlying risks.

For the purposes of this work, and in the context of the EBA FinTech Knowledge Hub, the EBA is kindly inviting all relevant stakeholders to share their views and experience on the use of existing RegTech solutions on a best effort basis. The responses will provide a valuable input into the EBA work on RegTech and, where relevant, potentially support the ongoing policy work in this area.

In order to collect information from the perspective of both financial institutions and ICT third party providers, the EBA has prepared two online versions of the questionnaire, one to be completed by the financial institutions, and another to be completed by ICT third party providers.

How to complete the RegTech industry survey

The questionnaire is structured as follows:

- **Section A** is dedicated to the collection of information on the RegTech solutions used by financial institutions, the main barriers to the adoption of RegTech solutions, as well as on the possible initiatives that could facilitate and support the uptake of RegTech solutions. **This part should be completed by all financial institutions.**
- **Section B** is dedicated to collect further information on the use of RegTech solutions, such as spending on RegTech, time to adopt, governance elements, and any challenges in using RegTech solutions. This part should be completed **only by financial institutions** who have **RegTech solution(s) in use /launched, pilot testing or under development.**
- **Section C** seeks to have a closer look at the RegTech solutions in four specific areas of focus, in particular: i) AML/CFT – on going monitoring of the business relationship and/or transaction monitoring, ii) creditworthiness assessment, iii) compliance with security requirements and standards (information security, cybersecurity, payment services), or iv) supervisory reporting. This part should be completed **only by financial institutions** who have **RegTech solution(s)** (in use/launched, pilot testing or under

development) **in the mentioned areas of focus**. Please respond for each RegTech solution that you use and which falls within the said categories separately. In practice this means that you are invited to **submit this section multiple times if you have more than one solution** that you would like to report.

Timeline

The EBA kindly invites to submit your response by 30 September 2020.

RegTech solutions to be reported

For the purposes of this questionnaire, the following definition applies:

RegTech means any range of applications of technology-enabled innovation for regulatory, compliance and reporting requirements implemented by a regulated institution (with or without the assistance of ICT third party providers).

Responses should refer only to RegTech solutions (in line with the above definition) as other applications (for example applications for enhancing internal processes) should not be included in this survey

Relation to other EBA work on reporting

The respondents are advised that this questionnaire whilst complementing other ongoing projects in the field of supervisory reporting and the use of technology there, has a different purpose and does not overlap with them, in particular:

- (a) the industry questionnaire for the study of the cost of compliance^[1] with supervisory reporting, and
- (b) feasibility study on integrated reporting.

In particular, this RegTech industry survey aims at:

- (i) mapping and understanding the existing RegTech reporting solutions available from a technology /innovation perspective, with a view of sharing knowledge across both industry and competent authorities;
- (ii) identifying the main barriers for the uptake of RegTech solutions; and
- (iii) stock taking on the potential initiatives to support the uptake of RegTech solutions.

The results of RegTech industry survey will be used to report on the current RegTech landscape and, where relevant, will inform the broader work on supervisory reporting.

To this end, the RegTech industry survey will not lead to any specific policy considerations or recommendation as regards the use of RegTech for the purposes of supervisory reporting, which is mean analysed in greater details in the two specific studies referred to above.

[1] <https://eba.europa.eu/regulation-and-policy/supervisory-reporting/cost-compliance-supervisory-reporting>

Section A

Profile

*** 1 Name of the financial institution**

2 LEI code or other type of code (if available)

3 Main contact point at the institution:

| | Main contact person |
|--------------------------|---------------------|
| * Name | |
| * Position | |
| * Contact e-mail address | |

* 4 Would you be willing to engage with the EBA on follow-up discussions on RegTech?

- Yes
 No

* 5 Type of the entity

- Credit institution
 Payment institution
 Electronic money institution
 Investment firm
 Other type of financial institution

6 Please indicate the type of financial institution

* 7 Entity size (where known to the institution based on points (145) and (146) of Article 4 (1) CRR):

- Small and non-complex
 Medium (other than large or small and non-complex)
 Large
 Not applicable / unknown

8 Total assets as of 31 December 2019 (in thousands EUR):

9 Amount of payment transactions carried out and/or e-money issued (in 2019):

thousands EUR

10 Type of payment institution:

- Payment institution as legally defined in Article 4(4) of PSD2
 Exempted payment institution under Article 32 of PSD2

- Account information service provider under Article 33 of PSD2

11 Type of electronic money institution:

- Electronic money institution as legally defined in Article 2(1) of EMD2
- Exempted electronic money institution under Article 9 of EMD2

* 12 Name of the main competent authority:

- | | | |
|--|--|---|
| <input type="radio"/> Austria - Financial Market Authority | <input type="radio"/> Germany - BaFin and Bundesbank | <input type="radio"/> Netherlands - De Nederlandsche Bank |
| <input type="radio"/> Belgium - National Bank of Belgium | <input type="radio"/> Greece - Bank of Greece | <input type="radio"/> Norway - Central Bank of Norway |
| <input type="radio"/> Bulgaria - Bulgarian National Bank | <input type="radio"/> Hungary - Central Bank of Hungary | <input type="radio"/> Poland - Polish Financial Supervision Authority |
| <input type="radio"/> Croatia - Croatian National Bank for credit institutions and Croatian Financial Services Supervisory Agency for investment firms | <input type="radio"/> Iceland - Financial Supervisory Authority | <input type="radio"/> Portugal - Banco de Portugal |
| <input type="radio"/> Cyprus - Central Bank of Cyprus | <input type="radio"/> Ireland - Central Bank of Ireland | <input type="radio"/> Romania - National Bank of Romania |
| <input type="radio"/> Czech Republic - Czech National Bank | <input type="radio"/> Italy - Banca d'Italia | <input type="radio"/> Slovakia - National Bank of Slovakia |
| <input type="radio"/> Denmark - Finanstilsynet | <input type="radio"/> Latvia - Financial and Capital Market Commission | <input type="radio"/> Slovenia - Bank of Slovenia |
| <input type="radio"/> ECB (SSM) | <input type="radio"/> Liechtenstein - Financial Services Authority | <input type="radio"/> Spain - Banco de España |
| <input type="radio"/> Estonia - Financial Supervision Authority | <input type="radio"/> Lithuania - Bank of Lithuania | <input type="radio"/> Sweden - Finansinspektionen |
| <input type="radio"/> Finland - Finanssivalvonta (Fin-FSA) | <input type="radio"/> Luxembourg - Commission de Surveillance du Secteur Financier | <input type="radio"/> Other |
| <input type="radio"/> France - Autorité de contrôle prudentiel et de Resolution | <input type="radio"/> Malta - Malta Financial Services Authority | |

13 Please specify the name of your competent authority

* 14 Jurisdictions where the entity actively provides its services under the right of establishment or on a cross border basis:

- | | | | |
|--|----------------------------------|-------------------------------------|--|
| <input type="checkbox"/> All EEA countries | <input type="checkbox"/> Iceland | <input type="checkbox"/> Hungary | <input type="checkbox"/> Poland |
| <input type="checkbox"/> Austria | <input type="checkbox"/> Czechia | <input type="checkbox"/> Ireland | <input type="checkbox"/> Portugal |
| <input type="checkbox"/> Belgium | <input type="checkbox"/> Denmark | <input type="checkbox"/> Italy | <input type="checkbox"/> Romania |
| <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Estonia | <input type="checkbox"/> Latvia | <input type="checkbox"/> Slovak Republic |
| <input type="checkbox"/> Croatia | <input type="checkbox"/> Finland | <input type="checkbox"/> Lithuania | <input type="checkbox"/> Slovenia |
| <input type="checkbox"/> Cyprus | <input type="checkbox"/> France | <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Spain |
| <input type="checkbox"/> Norway | <input type="checkbox"/> Germany | <input type="checkbox"/> Malta | <input type="checkbox"/> Sweden |

15 What is the level of involvement of your institution with the use/development of the RegTech solutions in each of the following areas?

| | In use / launched | Pilot testing | Under development | Under discussion | No activity |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| * AML/CFT – customer due diligence | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * AML/CFT – on going monitoring of the business relationship and/or transaction monitoring | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * AML/CFT – customer risk assessment | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Fraud detection | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Risk management (not AML/CFT related) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Mapping and tracking of regulatory policy developments | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Gap analysis against new regulation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Automated compliance checks against existing regulation/internal procedures | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Compliance with consumer protection requirements | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Creditworthiness assessment | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Compliance with security requirements and standards (information security, cybersecurity, payment services) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Supervisory reporting | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other 1 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other 2 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other 3 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

16 Please indicate the area you are referring to under "OTHER 1"

17 Please indicate the area you are referring to under "OTHER 2"

18 Please indicate the area you are referring to under "OTHER 3"

* 19 Please provide a brief description of the **AML/CFT on going monitoring of the business relationship and/or transaction monitoring solution that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

* 20 Please provide a brief description of the **AML/CFT customer risk assessment solution that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

* 21 Please provide a brief description of the **fraud detection RegTech solution that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

* 22 Please provide a brief description of the **risk management (not AML/CFT related) RegTech solution that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

* 23 Please provide a brief description of the **RegTech solution concerning the mapping and tracking of regulatory policy developments that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

* 24 Please provide a brief description of the **RegTech solution concerning the gap analysis against new regulation that you have already implemented or are in pilot testing or under development** (e.g.

area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

- * 25 Please provide a brief description of the **AML/CTF customer due diligence** solution that you have already implemented or are in pilot testing or under development (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

- * 26 Please provide a brief description of the RegTech solution concerning the **automated compliance checks against existing regulation/internal procedures** that you have already implemented or are in pilot testing or under development (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

- * 27 Please provide a brief description of the RegTech solution concerning the **compliance with consumer protection requirements** that you have already implemented or are in pilot testing or under development (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

- * 28 Please provide a brief description of the **creditworthiness assessment** RegTech solution that you have already implemented or are in pilot testing or under development (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

- * 29 Please provide a brief description of the RegTech solution concerning the **compliance with security requirements and standards (information security, cybersecurity, payment services)** that you have already implemented or are in pilot testing or under development (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

*** 30 Please provide a brief description of the RegTech solution concerning the supervisory reporting that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

*** 31 Please provide a brief description of the RegTech solution concerning other areas that you have already implemented or are in pilot testing or under development** (e.g. area of application, objective, EU or national regulatory requirements that the solution helps to comply with, technologies used, replacement of manual process). Please feel free to add a link to the webpage of the ICT third party provider describing the solution, if applicable).

32 Are there benefits in the use of RegTech in the following areas?

| | 4- Agree | 3- Somewhat agree | 2- Somewhat disagree | 1- Disagree | 0-No opinion |
|---|-----------------------|-------------------------|----------------------------|-----------------------|-----------------------|
| * AML/CFT – customer due diligence | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * AML/CFT – on going monitoring of the business relationship and/or transaction monitoring | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * AML/CFT – customer risk assessment | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Fraud detection | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Risk management (not AML/CFT related) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Mapping and tracking of regulatory policy developments | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Gap analysis against new regulation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Automated compliance checks against existing regulation/internal procedures | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Compliance with consumer protection requirements | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Creditworthiness assessment | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Compliance with security requirements and standards (information security, cybersecurity, payment services) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Supervisory reporting | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | |
|---------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Other 1 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other 2 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other 3 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

33 Please provide any comment on the reasons why the use of RegTech in the following areas is beneficial or not.

| | Reason(s) why the use of RegTech in the relevant area is beneficial or not |
|---|--|
| AML/CFT – customer due diligence | |
| AML/CFT – on going monitoring of the business relationship and/or transaction monitoring | |
| AML/CFT – customer risk assessment | |
| Fraud detection | |
| Risk management (not AML/CFT related) | |
| Mapping and tracking of regulatory policy developments | |
| Gap analysis against new regulation | |
| Automated compliance checks against existing regulation/internal procedures | |
| Compliance with consumer protection requirements | |
| Creditworthiness assessment | |
| Compliance with security requirements and standards (information security, cybersecurity, payment services) | |
| Supervisory reporting | |
| Other 1 | |
| Other 2 | |
| Other 3 | |

34 In your opinion, IN GENERAL, what are the main barriers for the adoption of new RegTech solutions?

(Please indicate the significance of each factor in a 1 to 5 scale, where 1 stands for "Not relevant" and 5 stands for "Very relevant")

| | 1 - not relevant | 2 | 3 | 4 | 5 - very relevant |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| * Lack of trust (and buy in) by senior management regarding the effectiveness, reliability, and/or functioning of RegTech solutions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of a single solutions available in all Member States in which a cross-border institution operates or would like to operate | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of reliable ICT third party providers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in screening of RegTech solutions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in carrying due diligence checks on ICT third party providers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of internal skills and experience to develop or adopt RegTech solutions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Cost of internally developing or acquiring RegTech solutions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of understanding of the functioning of third party RegTech solutions; | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of culture of digital change | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Language barrier | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Unclear true cost savings by the RegTech solution | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Unclear value generated by the RegTech solution | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring interoperability with existing ICT infrastructure | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring interoperability between multiple external RegTech solutions in use | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring a viable Business Continuity Plan for RegTech solution | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring a viable exit strategy of RegTech solution | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring compliance with General Data Protection Regulation (GDPR) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Lack of harmonised EU financial services regulation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| * Divergent regulatory expectations across the EU | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Difficult or not possible to customise available RegTech solutions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other(s) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

35 Please indicate which are the other barriers you are referring to

36 If you have indicated some of the barriers mentioned in the previous question as relevant (4) or very relevant (5), please specify the reasons why they are relevant and indicate any action(s) you have taken or the action(s) that could be taken to address these barriers

| | Reasons why the barrier is relevant | Actions taken by the financial institution to address this barrier | Possible actions that could be taken by the financial institution to address this barrier |
|---|-------------------------------------|--|---|
| Lack of trust (and buy in) by senior management regarding the effectiveness, reliability, and/or functioning of RegTech solutions | | | |
| Lack of a single solutions available in all Member States in which a cross-border institution operates or would like to operate | | | |
| Lack of reliable ICT third party providers | | | |
| Challenges in screening of RegTech solutions | | | |
| Challenges in carrying due diligence checks on ICT third party providers | | | |
| Lack of internal skills and experience to develop or adopt RegTech solutions | | | |
| Cost of internally developing or acquiring RegTech solutions | | | |
| Lack of understanding of the functioning of third party RegTech solutions | | | |
| Lack of culture of digital change | | | |
| Language barrier | | | |
| Unclear true cost savings by the RegTech solution | | | |
| Unclear value generated by the RegTech solution | | | |
| Challenges in ensuring interoperability with existing ICT infrastructure | | | |
| Challenges in ensuring interoperability between multiple external RegTech solutions in use; | | | |
| Challenges in ensuring a viable Business Continuity Plan for RegTech solution | | | |

| | | | |
|--|--|--|--|
| Challenges in ensuring a viable exit strategy of RegTech solution | | | |
| Challenges in ensuring compliance with General Data Protection Regulation (GDPR) | | | |
| Lack of harmonised EU financial services regulation | | | |
| Divergent regulatory expectations across the EU | | | |
| Difficult or not possible to customise available RegTech solutions | | | |
| Other(s) | | | |

*** 37 Are you developing or exploring the possibility to develop RegTech solution(s) in collaboration with other market participants?**

Yes

No

*** 38 Please elaborate on the type of collaboration you are developing/exploring**

39 In your opinion, what initiatives could be taken at the EU level to support the uptake of RegTech solutions?

| | Please specify potential initiatives / actions |
|--|--|
| Possible initiatives for building and sharing knowledge on RegTech | |
| Possible initiatives to aid the screening process of RegTech solutions | |
| Possible initiatives to reduce the costs of 'due diligence' of ICT third party providers | |
| Possible initiatives to provide additional assurance of the quality of the RegTech services provided | |
| Other possible initiatives | |

* 40 Do you consider that a RegTech platform collecting and disseminating RegTech solutions available / implemented by EU financial institutions would be beneficial?

- Yes
- No

41 Please briefly explain how this platform could be established and operated

42 Please briefly explain why you think the establishment of a platform would not be beneficial

* 43 Do you consider that the introduction of certification requirements for RegTech products, services and/or processes would be of help?

- Yes
- No

44 Please briefly explain why do you think that the introduction of the certification requirement would be of help and what the potential scope of the certification could be

45 Please briefly explain why you think that the introduction of certification requirements for RegTech products, services and/or processes would **not** be of help

Section B

How much have you spent in RegTech solutions in 2019, compared to your general ICT spending:

1 Indicative amount spent in the area of ICT and technology in general:

 Thousands EUR

2 Of which spent on acquisition, development and/or maintenance of RegTech solutions:

 %

* 3 RegTech spending forecast for 2020/2021 compared to 2019.

- Significant increase (more than 50%)
- Increase (25-50%)
- Slight increase (less than 25%)
- No change

- Slight decrease (less than 25%)
- Decrease (25-50%)
- Significant decrease (more than 50%)

*** 4 How has the COVID-19 crisis affected the development/adoption of RegTech solutions?**

- Budget for RegTech has increased, as digitalisation processes have been speeded up
- Budget for RegTech has decreased, due to other priorities
- Adoption of RegTech slowed down due to operational issues on the ICT third party provider side (e.g. operational problems, workloads related to pandemic situation, etc.)
- COVID-19 had no effect
- Other
- N/A

5 Please explain how the COVID-19 crisis affected the development/adoption of the RegTech solution.

*** 6 When selecting ICT third party providers, which functions do you involve?**

- Business lines
- Risk management function
- Compliance function
- Legal function
- AML/CFT function
- ICT function
- Internal audit function
- Other(s)

7 Please indicate the other function(s) involved

8 Please provide a brief explanation on the role of each function, if relevant

*** 9 Did you have to undertake any internal changes to enable the adoption of RegTech solutions?**

- No changes required
- Modernisation of the ICT infrastructure
- Training internal staff
- Hiring highly skilled professionals (e.g. data scientists)
- Changes in organisational structure (e.g. setting-up of a dedicated RegTech unit)
- Other

10 Please briefly describe other internal change(s) undertaken

11 Please provide further information on the internal changes made, if relevant

12 Have you encountered any challenges in the day-to-day use of RegTech solution(s)?

(Please indicate the significance of each factor in a 1 to 5 scale, where 1 stands for "Not relevant" and 5 stands for "Very relevant")

| | 1 - Not relevant | 2 | 3 | 4 | 5 - very relevant |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| * Lack of ability to solve issues internally (need to contact the ICT third party providers' help desk for any problem) i.e. high dependency on TPPs | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Need for frequent maintenance/updating | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in monitoring the performance of the RegTech solution on an on-going basis | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Need for intensive and frequent training of staff | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Challenges in ensuring a viable exit strategy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Dependency on key internal staff (e.g. developers / operating staff) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * The solution did not work as expected (e.g. in terms of performance, quality, functionality) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other RegTech solution-specific challenge(s) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

13 Please indicate the other RegTech solution specific challenges

14 Please also briefly explain how you mitigate the challenge(s) that you indicated as relevant (4) or very relevant (5) in the previous question

| | Measures adopted to mitigate the relevant challenge |
|--|---|
| Lack of ability to solve issues internally (need to contact the ICT third party providers' help desk for any problem) i.e. high dependency on TPPs | |
| Need for frequent maintenance/updating | |
| Challenges in monitoring the performance of the RegTech solution on an on-going basis | |
| Need for intensive and frequent training of staff | |
| Challenges in ensuring a viable exit strategy | |
| Dependency on key internal staff (e.g. developers / operating staff) | |
| The solution did not work as expected (e.g. in terms of performance, quality, functionality) | |
| Other RegTech solution-specific challenge(s) | |

* 15 Have you identified any concerns from a consumer protection perspective while using RegTech solutions?

- Yes
 No

16 Please indicate which RegTech solution(s) you are referring to and briefly describe the consumer protection concern

* 17 Do you have RegTech solution(s) in use/launched, pilot testing or under development in the following areas i) AML/CFT – on going monitoring of the business relationship and/or transaction monitoring; ii) creditworthiness assessment; iii) compliance with security requirements and standards (information security, cybersecurity, payment services), or iv) supervisory reporting?

- Yes
 No

Thank you for completing the general part of the survey.

Please fill-in the specific part of the survey for each RegTech solution related to any of the following areas:

- (a) AML/CFT – on going monitoring of the business relationship and/or transaction monitoring
- (b) Creditworthiness assessment
- (c) Compliance with security requirements and standards (information security, cybersecurity, payment services)
- (d) Supervisory reporting

Using the address below or the link in the "useful link" section in the top right corner:

<https://ec.europa.eu/eusurvey/runner>

[/EBA_RegTech_Industry_Survey_Financial_institutions_Areas_of_Focus](https://ec.europa.eu/eusurvey/runner/EBA_RegTech_Industry_Survey_Financial_institutions_Areas_of_Focus)

Thank you for responding to the RegTech questionnaire! We appreciate your contribution.

