POINT OF VIEW - SEPTEMBER 2026

Netherlands: From Regulatory Obligation to Board-Ready Evidence.

Sound governance, information security and digital operational resilience

The Netherlands combines DNB prudential supervision, AFM conduct and governance oversight, European digital resilience and Dutch data-protection enforcement. Firms need clear governance, secure operations, controlled outsourcing, incident evidence and independent assurance.

REGION

Europe

REGULATORY HUB

NLD

Netherlands

Country in Brief

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Regulatory authorities profiled	Official regulatory sources mapped	Supervisory priorities operationalised	Connected TransVare platforms

01 Netherlands Regulatory Landscape

The Netherlands combines DNB prudential supervision, AFM conduct and governance oversight, European digital resilience and Dutch data-protection enforcement. Firms need clear governance, secure operations, controlled outsourcing, incident evidence and independent assurance.

DNB

De Nederlandsche Bank

Industries Regulated

Banking and lending, Payments and fintech

AFM

Netherlands Authority for the Financial Markets

Industries Regulated

Banking and lending

AP

Dutch Data Protection Authority

Industries Regulated

Cross-sector data controllers and processors

NCSC-NL

National Cyber Security Centre Netherlands

Industries Regulated

Capital markets and listed companies, Government and critical infrastructure

02 Supervisory Priorities

The applicable perimeter depends on entity type, licence and sector. These priorities provide a practical starting point for programme design and evidence management.

- **01** **Sound and controlled operations**
- **02** **Governance and risk oversight**
- **03** **Information security**
- **04** **Outsourcing and third-party resilience**
- **05** **Incident and data-breach response**

03 From Obligation to Board-Ready Evidence

Use one traceable workflow to translate requirements, manage execution and demonstrate oversight.

01

Catalogue Obligations

Structure local requirements by entity, licence, authority and accountable owner.

02

Connect Operational Evidence

Link obligations to risks, controls, incidents, tests, findings and remediation.

03

Monitor and Assure

Track KRIs, control status, audit coverage, incidents and action closure continuously.

04

Report to Leadership

Turn current operational evidence into traceable executive and board oversight.

04 Netherlands Regulation and Product Map

Each official requirement below is translated into an operational GRC focus. Only platforms with a defensible workflow or evidence role are shown as a primary or supporting fit.

Financial Supervision Act
Dutch Government, DNB and AFM

Applies To	Financial undertakings within the Act's applicable prudential and conduct provisions
Operational Focus	Sound governance, controlled business operations, risk management, internal controls, auditability and supervisory reporting.
ERMCare® **Primary Fit**	Risk and control registers, assessments, appetite or limits, KRIs, treatments, approvals and board reporting.
AuditCare® **Supporting Fit**	Risk-based assurance, control design and effectiveness testing, evidence, findings and action follow-up.
Scope Boundary	Notification workflow and evidence can be configured. Submission to an authority requires an approved process or integration.
Official Source	**Open Official Source**

Governance Requirements for Banks
DNB

Applies To	Banks operating within DNB's supervisory perimeter
Operational Focus	Management-body effectiveness, risk culture, internal governance, control functions, internal audit and accountable decision-making.
ERMCare® **Primary Fit**	Risk and control registers, assessments, appetite or limits, KRIs, treatments, approvals and board reporting.
AuditCare® **Primary Fit**	Audit universe, risk-based planning, RCM-linked testing, working papers, evidence, findings and follow-up.
Scope Boundary	Workflow and evidence support only. Applicability and legal interpretation remain with the organisation and its advisers.
Official Source	**Open Official Source**

Digital Operational Resilience Act
European Union and DNB

Applies To	Financial entities and ICT third-party providers within DORA's scope
Operational Focus	ICT risk, incident reporting, resilience testing, third-party registers, recovery, lessons learned and board oversight.
Primary Fit	Third-party risks, controls, assessments, treatments, approvals, KRIs and oversight reporting.
Primary Fit	Disruption reporting, escalation, investigation, corrective action, recovery tracking and closure evidence.
Scope Boundary	Workflow and evidence support only. Applicability and legal interpretation remain with the organisation and its advisers.
Official Source	**Open Official Source**

Outsourcing Requirements
DNB

Applies To	Banks, payment institutions and electronic-money institutions within scope
Operational Focus	Materiality, due diligence, contracting, monitoring, concentration risk, continuity, exit plans and audit access.
Primary Fit	Third-party risks, controls, assessments, treatments, approvals, KRIs and oversight reporting.
Supporting Fit	Risk-based assurance, control design and effectiveness testing, evidence, findings and action follow-up.
Scope Boundary	Workflow and evidence support only. Applicability and legal interpretation remain with the organisation and its advisers.
Official Source	**Open Official Source**

GDPR Data Breach Notification

AP

Applies To	Controllers and processors handling personal data within the GDPR's scope
Operational Focus	Breach registers, risk assessment, regulatory notification, affected-person communication, root-cause analysis and corrective action.
IncíVare® **Primary Fit**	Incident intake, assessment, investigation, notification workflow, corrective action, escalation and closure evidence.
ERMVare® **Primary Fit**	Risk and control registers, assessments, appetite or limits, KRIs, treatments, approvals and board reporting.
Scope Boundary	Notification workflow and evidence can be configured. Submission to an authority requires an approved process or integration.
Official Source	**Open Official Source**

Research Review	**Primary Fit**	**Supporting Fit**	**Not Shown**
Official-source and product-fit review completed 1 September 2026.	Directly manages a central process or evidence set.	Contributes linked evidence, oversight or follow-up.	Weak or unsubstantiated relationships are omitted.

05 Brochure-Validated Product Capability

The mapping uses capabilities documented in the current TransVare solution briefs. It does not extend the platforms beyond their stated functional scope.

ERMVare®

Risk and Control Intelligence

Enterprise risk ownership, risk and control registers, assessments, appetite and tolerances, KRIs, treatments, approvals, dashboards and board reporting.

Central risk and control register | KRI threshold alerts | Treatment action tracking | AI-assisted drafting and classification

AuditVare®

Independent Assurance

Audit universe, risk-based planning, engagement execution, RCM-linked control testing, evidence, findings, approvals and follow-up.

Risk-based audit planning | ToD and ToE procedures | Working papers and evidence | GIAS 2024 observation drafting

InciVare®

Incident Response and Closure

Incident intake, triage, investigation, root-cause analysis, escalation, notifications, corrective action, closure and lessons learned.

Central incident register | Investigation and root cause | Escalation and notifications | Corrective-action tracking

Scope Boundary

The platforms support governance workflows, accountability, evidence and reporting. They do not calculate regulatory capital or liquidity, replace technical cybersecurity monitoring, provide legal interpretation, issue external-audit opinions or automatically file statutory notifications unless an approved integration and process are configured.

06 Sources, Scope and Next Step

Official sources used in this report are linked directly from each regulation summary. The mapping is an implementation aid and not legal advice.

01	**Financial Supervision Act** Dutch Government, DNB and AFM	Official Source
02	**Governance Requirements for Banks** DNB	Official Source
03	**Digital Operational Resilience Act** European Union and DNB	Official Source
04	**Outsourcing Requirements** DNB	Official Source
05	**GDPR Data Breach Notification** AP	Official Source

TransVare provides configurable technology to support governance, risk, audit and incident-management processes. Platform use does not, by itself, constitute or guarantee regulatory compliance. Applicability depends on entity type, licence, sector and current legal requirements. Obtain professional advice before relying on any regulatory mapping.

THE NEXT STEP

Build a Connected GRC Operating Model for Netherlands.

See how TransVare can support local regulatory readiness while preserving regional visibility and board oversight.

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