DORA - Register of Information Customer Guide

This guide is intended to help EU financial entities to complete their Register of Information for Google Cloud services based on the templates in the [Implementing Technical Standard](#) (ITS). This guide addresses [template B_02.02 (Contractual arrangements – specific information)](#) and [template B_05.01 (ICT third-party service providers)](#). This guide does not address template B_05.02 (ICT service supply chain). If you need information for template B_05.02 (ICT service supply chain), please reach out to your Google Cloud account representative.

We have extracted the templates B_02.02 and B_05.01 and the associated instructions in the ITS below and added Google Cloud commentary to either: (a) provide the relevant information, or (b) indicate if the information needs to be completed by customers. In certain cases, how you complete the template will depend on which services / regions your organization chooses to use.

Google is in the process of obtaining an applicable identification code (LEI or EUID) for the relevant Google Cloud entities. We will update this document when the codes are available. The European Supervisory Authorities (ESAs) have [confirmed](#) that the deadline for National Competent Authorities (NCAs) to submit consolidated Register information is 30 April 2025. NCAs are allowed to set their own deadlines for collecting registers from financial entities to meet this deadline. The ESAs have also provided additional guidance on completing the Register of Information in these [FAQs](#).

B_02.02 - Contractual arrangements – specific information

Instructions to complete template B_02.02 — Contractual arrangements – Specific information

Financial entities shall fill in this template with the maximum level of granularity possible. Where the contractual arrangement includes multiple ICT services supporting multiple functions, financial entities shall use as many rows as the elements in the template by combining the ICT services covered in the contractual arrangement and the financial entity's functions.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_02.02.0010	**Contractual arrangement reference number**	Alphanumerical	**As reported in B_02.01.0010**	Mandatory	To be completed by the customer.
B_02.02.0020	**LEI of the financial entity making use of the ICT service(s)**	Alphanumerical	**As reported in B_04.01.0020** Identify the financial entity making use of the ICT service(s) using the LEI, 20-character, alpha-numeric code based on the ISO 17442 standard	Mandatory	To be completed by the customer.
B_02.02.0030	**Identification code of the ICT third-party service provider**	Alphanumerical	**As reported in B_05.01.0010** Code to identify the ICT third-party service provider as reported in B_05.01.0010 for that provider.	Mandatory	See B_05.01.0010.
B_02.02.0040	**Type of code to identify the ICT third-party service provider**	Pattern	**As reported in B_05.01.0020** Type of code to identify the ICT third-party service provider in B_02.02.0030 as reported in B_05.01.0020 for that provider.	Mandatory	See B_05.01.0020.
B_02.02.0050	**Function identifier**	Pattern	**As defined by the financial entity in B_06.01.0010**	Mandatory	To be completed by the customer.
B_02.02.0060	**Type of ICT services**	Closed set of options	**One of the types of ICT services referred to in Annex III**	Mandatory	**Google Cloud Platform:** S.17: Cloud services: IaaS and S.18: Cloud services: PaaS **Google Workspace:** S.19: Cloud Services: SaaS

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
					SecOps Services: S.4: ICT Security Management Services **Note:** Ultimately, it is for the financial entity to decide which ICT service types to list. Google believes these ICT service types are the most relevant overarching categories for the Google Cloud services and that these overarching categories will be most helpful to national competent authorities and the European Supervisory Authorities when they come to consolidate the register information.
B_02.02.0070	**Start date of the contractual arrangement**	Date	Identify the date of entry into force of the contractual arrangement as stipulated in the contractual arrangement using the ISO 8601 (yyyy–mm–dd) code	Mandatory	Refer to the Effective Date of your Google Cloud contract.
B_02.02.0080	**End date of the contractual arrangement**	Date	Identify the end date as stipulated in the contractual arrangement using the ISO 8601 (yyyy–mm–dd) code. Where the contractual arrangement is indefinite, it shall be filled in with '9999-12-31'. Where the contractual arrangement has been terminated on a date different than the end date, this shall be filled in with the termination date. Where the contractual arrangement foresees a renewal, this shall be filled in with the date of the contract renewal as stipulated in the contractual arrangement.	Mandatory	Refer to the "Term and Termination" section of your Google Cloud contract. In most cases, the term of the Google Cloud contract is indefinite.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_02.02.0090	**Reason of the termination or ending of the contractual arrangement**	Closed set of options	Where the contractual arrangement has been terminated or ended, identify the reason of the termination or ending of the contractual arrangements using one of the options in the following closed list: 1. Termination not for cause: The contractual arrangement has expired/ended and has not been renewed by any of the parties; 2. Termination for cause: The contractual arrangement has been terminated, the ICT third-party service provider being in a breach of applicable law, regulations or contractual provisions; 3. Termination for cause: The contractual arrangement has been terminated, due to the fact that impediments of the ICT third-party service provider capable of altering the supported function have been identified; 4. Termination for cause: The contractual arrangement has been terminated due to weaknesses of the ICT third-party service provider regarding the management and security of sensitive data or information of any of the counterparties; 5. Termination following a request by a competent authority: The contractual arrangement has been terminated following a request by a competent Authority. 6. Other: The contractual arrangement has been terminated by any of the parties for any other reason than the reasons referred to in points 1 to 5.	Mandatory if the contractual arrangement is terminated	To be completed by the customer.
B_02.02.0100	**Notice period for the financial entity making use of the ICT service(s)**	Natural number	Identify the notice period for terminating the contractual arrangement by the financial entity in a business-as-usual case. The notice period shall be expressed as number of calendar days from the counterparty's receipt of the request to terminate the ICT service.	Mandatory if the ICT service is supporting a critical or important function	Refer to the "Term and Termination" section of your Google Cloud contract.
B_02.02.0110	**Notice period for the ICT third-party service provider**	Natural number	Identify the notice period for terminating the contractual arrangement by the direct ICT third-party service provider in a business-as-usual case. The notice period shall be expressed as number of calendar days from the counterparty's receipt of the request to terminate the ICT service.	Mandatory if the ICT service is supporting a critical or important function	Refer to the "Term and Termination" section of your Google Cloud contract.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_02.02.0120	**Country of the governing law of the contractual arrangement**	Country	Identify the country of the governing law of the contractual arrangement using the ISO 3166–1 alpha–2 code.	Mandatory if the ICT service is supporting a critical or important function	Refer to the "Governing Law" section of your Google Cloud contract.
B_02.02.0130	**Country of provision of the ICT services**	Country	Identify the country from where the ICT services are provided using the ISO 3166–1 alpha–2 code.	Mandatory if the ICT service is supporting a critical or important function	To be completed by the customer. **Google Cloud Platform:** • Information about the location of Google's facilities and where individual Google Cloud services can be deployed is available on our Global Locations page. • Information about the location of Google's subprocessors' facilities is available on our Google Cloud subprocessors page. • Google provides you with choices about where to store your data. Once you choose where to store your data, Google will not store it outside your chosen region(s). You can also choose to use tools provided by Google to enforce data location requirements. For more information, see our Data residency, operational transparency, and privacy for customers on Google Cloud Whitepaper. **Google Workspace:** • Information about the location of Google's facilities where Google Workspace services are deployed is available on our Data Center Locations page. • Information about the location of Google's subprocessors' facilities is available on our Google Workspace Subprocessors page. • Google provides you with choices about where to store your data. Once you choose where to store your data, Google will not store it outside your chosen region(s). You can also choose to use tools provided by Google to enforce data location requirements. For more information, see our Trusting your data Google Workspace whitepaper. **SecOps Services**: • Information about the location of Google's facilities and where SecOps services can be deployed is available on our SecOps Service Locations page. • Information about the location of Google's subprocessors' facilities is available on our SecOps subprocessors page.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_02.02.0140	Storage of data	[Yes/No]	Is the ICT service related to (or does it foresee) storage of data (even temporarily)? One of the options provided in the following closed list: 1. Yes 2. No	Mandatory if the ICT service is supporting a critical or important function	To be completed by the customer. This response depends on the specific Google Cloud service(s) your organization is using.
B_02.02.0150	Location of the data at rest (storage)	Country	Identify the country of location of the data at rest (storage) using the ISO 3166–1 alpha–2 code. If there are several countries of location, additional row(s) shall be used for each country.	Mandatory if 'Yes' is reported in B_02.02.0140	See B_02.02.0130.
B_02.02.0160	Location of management of the data (processing)	Country	Identify the country of location of the management of the data (processing) using the ISO 3166–1 alpha–2 code. If there are several countries of location, additional row(s) shall be used for each country.	Mandatory if the ICT service is based on or foresees data processing	See B_02.02.0130.
B_02.02.0170	Sensitiveness of the data stored by the ICT third-party service provider	Closed set of options	Identify the level of sensitiveness of the data stored or processed by the ICT third-party service provider using one of the options provided in the following closed list: 1. Low 2. Medium 3. High The most sensitive data take precedence: e.g. if both 'Medium' and 'High' apply, then 'High' shall be selected.	Mandatory if the ICT third-party service provider stores data and if the ICT service is supporting a critical or important function or material part thereof	To be completed by the customer. Customers determine what Customer Data to store using the Services.
B_02.02.0180	Level of reliance on the ICT service supporting the critical or important function.	Closed set of options	One of the options in the following closed list shall be used: Not significant; Low reliance: in case of disruption of the services, the supported functions would not be significantly impacted (no interruption, no important damage) or disruption can be resolved quickly and with minimal impact on the functions supported; Material reliance: in case of disruption of the services, the supported functions would be significantly impacted if the disruption lasts more than a few minutes/few hours, and the disruption may cause damages, but is still manageable; Full reliance: in case of disruption of the services, the supported functions would be immediately and severely interrupted/damaged, for a long period.	Mandatory if the ICT service is supporting a critical or important function or material part thereof	To be completed by the customer.

B_05.01 - ICT third-party service providers

Instructions to complete template B_05.01 — ICT third-party service provider

Financial entities shall identify all the relevant ICT third-party service providers, including:

(a) all the direct ICT third-party service providers;

(b) all ICT intra-group service provider;

(c) all subcontractors that are identified in template B_05.02 on the ICT service supply chain;

(d) all ultimate parent undertakings of the ICT third-party service providers referred to in points (a), (b) and (c) above.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_05.01.0010	**Identification code of ICT third-party service provider**	Alphanumerical	Code to identify the ICT third-party service provider. Where LEI is used, it shall be provided as a 20-character, alpha-numeric code based on the ISO 17442 standard. Where EUID is used, it shall be provided as specified in Article 9 of the Commission Implementing Regulation (EU) 2021/1042.	Mandatory	See B_05.01.0050. **Note:** Google is in the process of obtaining an applicable identification code (LEI or EUID) for the relevant Google Cloud entities. We will update this document when the code is available.
B_05.01.0020	**Type of code to identify the ICT third-party service provider**	Pattern	Type of code to identify the ICT third-party service provider reported in B_05.01.0010 1. 'LEI' for LEI 2. 'EUID' for EUID 3. Country Code'+Underscore+'Type of Code' for non LEI and non EUID code Country Code: Identify the ISO 3166−1 alpha−2 code of the country of issuance of the other code to identify the ICT third-party service provider Type of Code: 1. CRN for Corporate registration number 2. VAT for VAT number 3. PNR for Passport Number 4. NIN for National Identity Number Only LEI or EUID shall be used for legal persons, as identified in B_05.01.0070, whereas alternative code may be used only for an individual acting in a business capacity. Only LEI shall be used for legal persons that are not established in the Union.	Mandatory	See B_05.01.0010.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_05.01.0030	**Additional identification code of ICT third-party service provider**	Alphanumerical	Additional code to identify the ICT third-party service provider, where available.	Optional	See B_05.01.0010.
B_05.01.0040	**Type of additional identification code to identify the ICT third-party service provider**	Pattern	The type of additional code to identify the ICT third-party service provider reported in B_05.01.0030: 1. 'LEI' for LEI 2. 'EUID' for EUID 3. CRN for Corporate registration number 4. VAT for VAT number 5. PNR for Passport Number 6. NIN for National Identity Number LEI or EUID shall be used for legal persons, as identified in B_05.01.0070, whereas alternative code may be used only for an individual acting in a business capacity. Only LEI shall be used for legal persons that are not established in the Union.	Mandatory, if B_05.01.0030 is reported	See B_05.01.0010.
B_05.01.0050	**Legal name of the ICT third-party service provider**	Alphanumerical	Legal name of the ICT third-party service provider as registered in business register in Latin, Cyrillic or Greek alphabets.	Mandatory	Information about Google Cloud Contracting Entities is available [here](#).
B_05.01.0060	**Name of the ICT third-party service provider in Latin alphabet**	Alphanumerical	Name of the ICT third-party service provider in Latin alphabet. Where the name of the ICT third-party service provider reported in B_05.01.0050 is in Latin alphabet, it shall be repeated also in this data field.	Mandatory	See B_05.01.0050.
B_05.01.0070	**Type of person of the ICT third-party service provider**	Closed set of options	One of the options in the following closed list shall be used: 1. Legal person, excluding individuals acting in business capacity 2. Individual acting in a business capacity	Mandatory	Legal person, excluding individuals acting in business capacity

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_05.01.0080	**Country of the ICT third-party service provider's headquarters**	Country	Identify the ISO 3166−1 alpha−2 code of the country in which the global operating headquarters of ICT third-party service provider are located (usually, this country is the country of tax residence).	Mandatory	See the country of the office address for the Google Cloud Contracting Entities here.
B_05.01.0090	**Currency of the amount reported in B_05.01.0070**	Currency	Identify the ISO 4217 alphabetic code of the currency used to express the amount in B_05.01.0100. The currency reported shall be the same currency used by the financial entity for the preparation of the financial statements at entity, sub-consolidated or consolidated level, as applicable.	Mandatory if B_05.01.0100 is reported	To be completed by the customer.
B_05.01.0100	**Total annual expense or estimated cost of the ICT third-party service provider**	Monetary	Annual expense or estimated cost for using the ICT services provided by the ICT third-party service provider to the entities making use of the ICT services. Monetary value shall be reported in units.	Mandatory if the ICT third-party service provider is a direct ICT third-party service provider	To be completed by the customer.
B_05.01.0110	**Identification code of the ICT third-party service provider's ultimate parent undertaking**	Alphanumerical	Code to identify the ICT third-party service provider's ultimate parent undertaking. The code used to identify ultimate parent undertaking in this field shall match the identification code provided in B_05.01.0010 for that ultimate parent undertaking. Where the ICT third-party service provider is not part of a group, the identification code used to identify that ICT third-party service provider in B_05.01.0010 shall be repeated also in this data field.	Mandatory if the ICT third-party service provider is not the ultimate parent undertaking	5493006MHB84DD0ZWV18 Alphabet, Inc. is the ultimate parent undertaking for all Google Cloud Contracting Entities.

Column Code	Column Name	Type	Fill-in Instruction	Fill-in Option	Google Cloud commentary
B_05.01.0120	**Type of code to identify the ICT third-party service provider's ultimate parent undertaking**	Pattern	Type of code to identify the ICT third-party service provider's ultimate parent undertaking in B_05.01.0110. The type of the code used to identify ultimate parent undertaking in this field shall match the identification code provided in B_05.01.0020 for that ultimate parent undertaking. Where the ICT third-party service provider is not part of a group, the type of the identification code used to identify that ICT third-party service provider in B_05.01.0020 shall be repeated also in this data field.	Mandatory if the ICT third-party service provider is not the ultimate parent undertaking	LEI