DORA Register of Information Data Sheet

KYCJet data for the register kept by each financial entity under Article 28(3) of Regulation (EU) 2022/2554, following the templates of Commission Implementing Regulation (EU) 2024/2956. Version of 21 September 2026. Fields marked "customer" are completed by the financial entity; those in square brackets are completed by GREM S.R.L.

The provider (template B_05.01)

Field	Value
Provider identification code	[LEI, if available; otherwise EUID ITSA.[REA number]]
Type of code	[LEI / EUID]
Name	GREM S.R.L.
Type of person	Legal person
Country of headquarters	Italy (IT)
Currency	EUR
Annual expense	Customer
Ultimate parent undertaking	[None / specify]

The contractual arrangement (templates B_02.01 and B_02.02)

Field	Value
Contractual arrangement reference	Customer
Type of arrangement	Standalone arrangement
Type of ICT service (taxonomy in Annex III of the ITS)	Cloud services — software as a service (SaaS)
Description	Remote identity verification: document and chip reading, face liveness check, anti-money-laundering screening, tools with which the customer decides cases (Standard plan) or human review by the provider (Institutional plan), automatic approval, on the customer's instruction, of cases green on every check, retention and erasure of records
Start date / expected end date	Customer
Financial entity's termination notice period	[30 days] (DORA addendum, clause 7)

Field	Value
Provider's termination notice period	[6 months], plus the exit plan transition period
Governing law	Italian
Country of provision of the service	Germany, Ireland, Switzerland
Storage of data	Yes
Location of data storage	Germany (database), Ireland (photographs)
Location of data processing	Germany, Ireland; Switzerland only for the name sent for screening
Personal data	Yes, including special categories (biometric data)
Data sensitiveness	High
Level of reliance	Customer

The function supported (template B_06.01)

Field	Value
Function	Customer due diligence: identification and identity verification
Critical or important	Customer
Reasons for criticality	Customer
Recovery time objective	Customer — reference: provider RTO [8 hours]
Recovery point objective	Customer — reference: provider RPO [24 hours]

The subcontracting chain (template B_05.02)

Rank	Subcontractor	Country	Function
2	Hetzner Online GmbH	Germany	Application servers and database
2	Amazon Web Services EMEA SARL	Ireland (Luxembourg for the contract)	Photograph storage, document reading, face comparison, liveness check
2	Dilisense	Switzerland	Screening against sanctions, PEP and criminal proceedings lists

Assessment of the service (template B_07.01)

Field	Reference value
Substitutability	Substitutable: other remote identity verification providers and alternative methods exist (SPID, qualified electronic signature, in-person identification). Customer for the final assessment
Exit plan	Yes — *Exit Plan* document
Possibility of reintegration	Possible through the alternative methods; records can be exported in an open format
Impact of discontinuing	Customer — reference: suspension of remote onboarding of new relationships, not of existing ones
Alternative providers identified	Customer
Date of last assessment	Customer