
PILLAR 3 DATA HUB

INSTITUTIONS' ONBOARDING PLAN

MAY 2025

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Introduction

1. With the publication of the final report on the final draft Implementing Technical Standards (ITS) on IT solutions as regards the public disclosures by large and other institutions¹, the EBA is currently putting in place all the necessary processes for the first implementation of the Pillar 3 Data Hub ('P3DH' or 'data hub'), including the onboarding process for institutions in scope².
2. This plan provides detailed information on the steps to be followed to onboard the institutions. Contact information of the EBA helpdesk support is also provided. In addition to this, a list of frequently asked questions (FAQs) is published for the first implementation of the P3DH and first submission of Pillar 3 information by institutions. The EBA intends to update the list of FAQs when considered necessary.

¹ [Final Report on the final draft ITS on IT solutions as regards the public disclosures by large and other institutions](#), published in February 2025 and submitted to the European Commission for adoption.

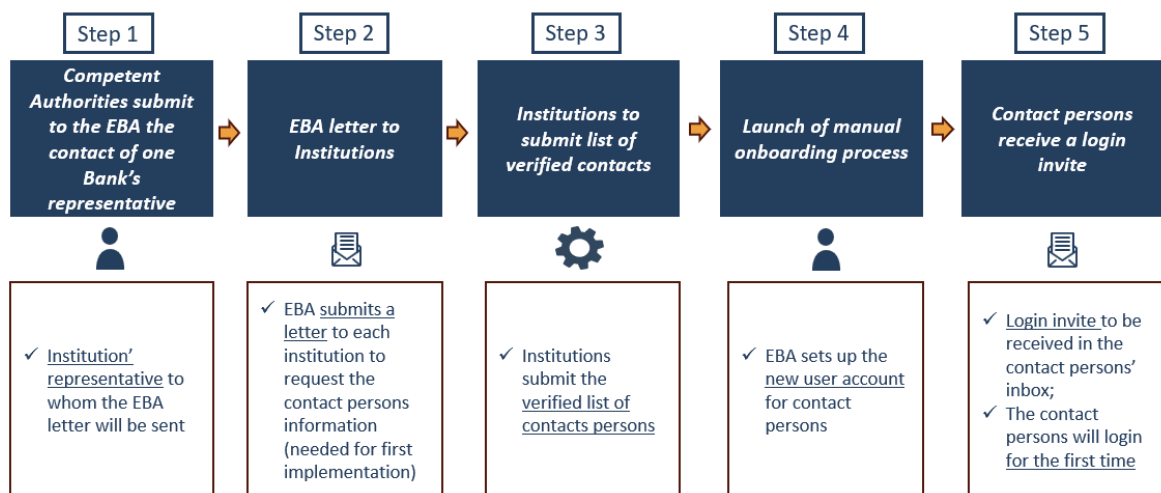
² The first implementation of the P3DH will solely cover large and other institutions, in line with the current final draft ITS. The process to Small and Non-Complex Institutions (SNCIs) will be consulted and finalised separately.

Onboarding process

A. Overview of the onboarding process

3. Institutions other than small and non-complex (SNCIs) shall submit directly their Pillar 3 reports to the EBA via the EUCLID³ Regulatory Reporting Platform (ERRP). This onboarding plan provides an overview of the main steps that institutions shall follow to gain access to EUCLID platform and submit their Pillar 3 reports.
4. Below, an overview of the onboarding process is provided:

Figure 1. P3DH process to onboard institutions



B. Detailed description of the onboarding steps

Step 1: Collection of bank representative's contact details

5. The EBA has initiated the onboarding process to implement the P3DH by collecting, from the Competent Authorities (CAs), the contact details of one bank representative per institution.
6. The EBA has requested to the CAs the contact details of the Chair of the management body of the institution, collegial body representing the institution. This is aligned with the CRD provisions on management body responsibilities, which sets out in Article 88 that the

³ For more information on EUCLID, please see [EUCLID: The platform for banking and financial data](#).

management body⁴ must define, oversee and is accountable for the implementation of the governance arrangements of the institution, including the process of disclosure and communication, and ensures that the letter is addressed to the appropriate level within the institution.

Step 2: Individual EBA letter to institutions

7. Following the submission by the CAs of the contact details of the Chair of the management body for each institution, the EBA will prepare and send out individual letters to all institutions other than SNCIs that were identified by the EBA and respective CAs as in scope of P3DH, based on Articles 6 and 13 of the CRR and the collected EBA master data.
8. The individual letters will be sent out in June, electronically, to the Chair of the management body of the institution. If there is any case where it may not be possible to send the letter electronically to the institution, it will be sent via post on an exceptional basis. The Chair of the management body will be asked to identify the details of the contact persons within the organisation relevant for the purpose of the P3DH, including the submission of the Pillar 3 information.
9. The EBA individual letter will contain the following:
 - Information on the data and contact details to be submitted;
 - Instructions on how submit this data to the EBA, including the respective deadline;
 - Data Protection Notice (DPN): given that personal data will be requested by the EBA, the letter will be accompanied by a DPN providing all the relevant information from a data protection perspective, i.e. which personal data is collected and processed; purpose of this collection; who can access this data; for how long is it kept; legal basis to collect this information; rights regarding personal data; and contact details for enquiries.

Step 3: Submission by institutions of contact persons information

10. In addition to the regular collection of contact persons information required under the final draft ITS once the P3DH is up and running, it is necessary to collect this information before the first implementation of the data hub.
11. This collection will be requested in the letter that the EBA will send to institutions and will be based on the Annex to the final draft ITS on IT solutions to be adopted by the European Commission, which includes details for three contact persons. Detailed instructions on how to fill in the template will be annexed to the letter.

⁴ Article 3(1)(7) of CRD defines the management body as: an institution's body or bodies, which are appointed in accordance with national law, which are empowered to set the institution's strategy, objectives and overall direction, and which oversee and monitor management decision-making, and include the persons who effectively direct the business of the institution. Please see also Title 2 Section of the EBA guidelines on internal governance (EBA/GL/2021/05).

Figure 2. Contact persons template

X 01.00 - Institution's contact person for Pillar 3 Data Hub Process

	Institution information	Contact person 1	Contact person 2	Contact person 3
	0010	0020	0030	0040
0010 Name of the institution				
0020 Code				
0030 Type of code				
0040 National code				
0050 Country code				
0060 Functional e-mail				
0070 Name of the contact person				
0075 Surname of the contact person				
0080 Role in the institution				
0090 Contact information (e-mail)				
0100 Contact information (telephone)				

Note 1: A minor amendment to the initial template was considered after the submission to the European Commission.

Note 2: The draft ITS is not yet adopted by the European Commission.

12. In addition to the information on the contact persons, institutions will also be required to provide to the EBA the list of email domains in use.
13. Institutions shall submit all the information required that will be used by the EBA to setup the new user accounts. This information will be electronically submitted. Detailed guidance will be provided to institutions in the letter in order to ensure that the transmission of information is securely performed.

Step 4: Set up of user accounts

14. Following the reception of the contact details of the three persons nominated by the institution, the EBA will initiate the set up of user accounts to grant the contact persons the necessary credentials to access the EUCLID platform to submit the Pillar 3 information.
15. Access to the P3DH will be granted through the system currently in place at the EBA, Microsoft Entra ID identity and access management service for authentication to its applications. The list of contacts provided by the Chair of the management body of the institution (the verified list of contacts) shall be used to create guest user accounts on Entra ID in order to enable authentication to the EBA platform.

Step 5: Login invite to contact persons and access to the platform

16. Once an account is set up by the EBA for a new user to access EUCLID, a login invite will be sent to the user's inbox. To note, the login invite is sent to first time users only. The user will be required to login for the first time, using the corporate email and password defined by the user, and to set up a preferred Multi-Factor Authentication (MFA) method as a required additional security layer.
17. Following a successful setup, users will have access to the platform and will be able to submit information to the EBA. MFA will be required on each subsequent login attempt from the user. MFA will not be required only in case the MFA token of the previous login is still valid.

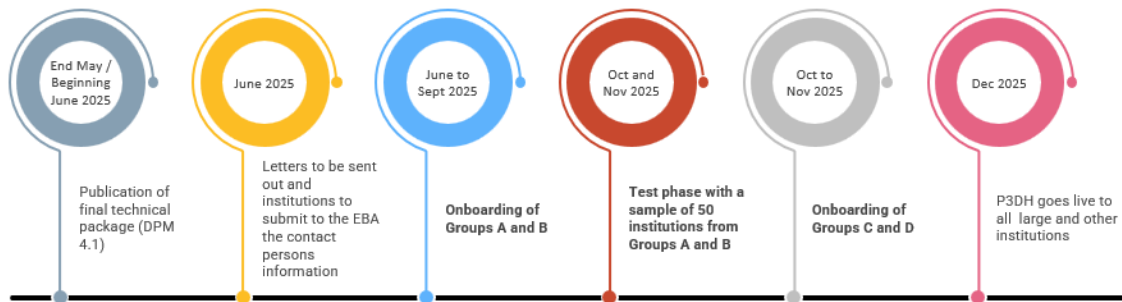
18. A comprehensive user guide on the identification solution will be developed and published by the EBA in due course.

C. Timeline for onboarding

19. The process to send out the login invites to the contact persons will be conducted by the EBA in different phases, by groups of institutions (four groups of institutions – A, B, C and D).
20. The allocation of an institution to one of the groups will be determined on the basis of the following criteria:
- Size and complexity of the institution;
 - Level at which the Pillar 3 information needs to be disclosed (consolidated or sub-consolidated / individual);
 - Whether the institution already participated in the P3DH pilot exercise.
21. Based on this criteria, the composition of the groups will be as follows:
- a. Group A: Mainly large institutions at the highest level of consolidation in the EEA and selected large subsidiaries (including those that participated in the P3DH pilot exercise);
 - b. Group B: Remaining large institutions at the highest level of consolidation in the EEA and other institutions at the highest level of consolidation in the EEA;
 - c. Group C: Remaining other institutions at the highest level of consolidation in the EEA;
 - d. Group D: Large subsidiaries (not selected for Group A).
22. The EBA will run a test phase with a sample of institutions from the first two groups. This test phase, which is the 'user acceptance test' (UAT), will be conducted with a sample of 50 institutions and will be crucial to identify aspects to be improved before the go-live of the P3DH for all institutions in scope.
23. The onboarding of all institutions is planned to occur by the end of November 2025. Under this phased-in approach, while institutions onboarded in the first groups might be able to submit the information at an earlier stage, all institutions in scope should be able to submit the respective Pillar 3 reports at the end of 2025 or beginning of 2026. As specified in the final draft ITS, during the transitional period institutions will be able to comply with their Pillar 3 obligations as usual, publishing on their own website with the usual timeline, without waiting for the submission to the P3DH. Afterwards, institutions will submit the Pillar 3 information to the P3DH according to the timeline in this document.

24. The overall timeline to complete the onboarding process of large and other institutions for the first implementation of the P3DH is presented below:

Figure 3. Timeline onboarding process



D. EBA helpdesk support

25. In case of any questions, please contact the EBA helpdesk support: P3DH@eba.europa.eu.



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