GRC+ DIGEST · 21 NOVEMBER 2026

Spain Digest

What applies in Spain, and by when. Each requirement with its dates, supervisors, incident deadlines and fines; then how GRC+ helps.

Coming Up

DATE	REQUIREMENT	WHAT HAPPENS
2 Dec 2026	AI Act	Marking of synthetic content, for systems already on the market
31 Dec 2026		Swift CSP attestation due
2 Aug 2027	AI Act	Existing general-purpose AI models must comply

Three Requirements to Look at First

NATIONAL LAW UNDER NIS2 · DRAFT PUBLISHED

NIS2

Key dates	**8 Jul 2026** Commission refers Ireland, Spain, France and the Netherlands to the Court of Justice
Incident reporting	Early warning: Without undue delay and in any event within 24 hours of becoming aware
Maximum fine	EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher (Essential)
Supervisors	CCN-CERT, INCIBE-CERT

NATIONAL LAW UNDER DORA · NO DRAFT YET

DORA

Key dates	**6 Oct 2026** Financial Sector Digitalisation Bill (121/000105) lapsed with the dissolution of the Cortes
Incident reporting	Initial notification: Within 4 hours of classifying it as major, and no later than 24 hours of becoming aware; if classified as major after that, within 4 hours of classifying it
Supervisors	Bank of Spain, CNMV, Directorate-General for Insurance and Pension Funds

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

AI Act

Key dates	**2 Aug 2026** Transparency duties apply, the general date of application **2 Dec 2026** Marking of synthetic content, for systems already on the market (coming up)
Incident reporting	First notice: Within 2 days of becoming aware for a widespread infringement or critical infrastructure disruption; 10 days for a death; 15 days otherwise
Maximum fine	EUR 35 million or 7% of worldwide (group) annual turnover, whichever is higher (Article 99(3) prohibited practices)

The First Three in Detail

NATIONAL LAW UNDER NIS2 · DRAFT PUBLISHED

NIS2

Not yet transposed in Spain; a draft law on cybersecurity coordination and governance is pending and the NIS1 requirements still apply.

Key dates	**17 Oct 2024** Transposition deadline **8 Jul 2026** Commission refers Ireland, Spain, France and the Netherlands to the Court of Justice
Supervisors	CCN-CERT of the National Cryptologic Centre (CCN-CERT) CSIRT INCIBE-CERT of the National Cybersecurity Institute (INCIBE-CERT) CSIRT
Incident reporting	**Early warning** Without undue delay and in any event within 24 hours of becoming aware **Incident notification** Without undue delay and in any event within 72 hours of becoming aware (24 hours for trust service providers, for incidents affecting their trust services) **Intermediate report** On request **Final report** Within one month of the incident notification To: CSIRT or competent authority
Maximum fines	**Essential** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher **Important** EUR 7 million or 1.4% of worldwide (group) annual turnover, whichever is higher The caps of NIS2 apply.
Managers	Managers can be held personally liable; Managers can be temporarily banned from their role
How we help	NIS2 Compliance Assessment Incident Reporting Desk

NATIONAL LAW UNDER DORA · NO DRAFT YET

DORA

Not adopted; the government bill with the national DORA provisions lapsed when the Cortes were dissolved in October 2026.

Key dates	**17 Jan 2025** Applies to financial entities **6 Oct 2026** Financial Sector Digitalisation Bill (121/000105) lapsed with the dissolution of the Cortes
Supervisors	Bank of Spain Competent authority National Securities Market Commission (CNMV) Competent authority Directorate-General for Insurance and Pension Funds Competent authority
Incident reporting	**Initial notification** Within 4 hours of classifying it as major, and no later than 24 hours of becoming aware; if classified as major after that, within 4 hours of classifying it **Intermediate report** Within 72 hours of the initial notification **Final report** Within one month of the latest intermediate report To: Financial supervisor (competent authority)
How we help	DORA Compliance Audit Vendor Risk Management

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

AI Act

Sets risk-based requirements for AI providers and deployers in the EU, from banned practices to high-risk systems and general-purpose models.

Key dates	**2 Aug 2026** Transparency duties apply, the general date of application **2 Dec 2026** Marking of synthetic content, for systems already on the market (coming up) **2 Aug 2027** Existing general-purpose AI models must comply (coming up)
Incident reporting	**First notice** Within 2 days of becoming aware for a widespread infringement or critical infrastructure disruption; 10 days for a death; 15 days otherwise To: AI Office and, as appropriate, national competent authorities
Maximum fines	**Article 99(3) prohibited practices** EUR 35 million or 7% of worldwide (group) annual turnover, whichever is higher **Article 99(4) operator and notified body obligations** EUR 15 million or 3% of worldwide (group) annual turnover, whichever is higher **Article 99(5) incorrect, incomplete or misleading information** EUR 7.5 million or 1% of worldwide (group) annual turnover, whichever is higher **Article 101 general-purpose AI model providers (fined by the Commission)** EUR 15 million or 3% of worldwide (group) annual turnover, whichever is higher
How we help	EU AI Act Readiness Assessment

Every Other Requirement in Spain

The other requirements on the country page, with their status and the facts we have reviewed.

NATIONAL LAW UNDER GDPR · IN FORCE

GDPR (LOPDGDD)

Applies the regulation in Spain, with the AEPD as supervisor, a consent age of 14, sectors that must appoint a DPO and digital rights at work.

Key dates	**25 May 2018** Applies across the EU
Supervisors	Spanish Data Protection Agency (AEPD) Data protection authority
Incident reporting	**Notification to the supervisory authority** Without undue delay and, where feasible, within 72 hours of becoming aware **Intermediate report** In phases, without undue further delay To: Competent supervisory authority
Maximum fines	**Article 83(4) infringements** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher **Article 83(5) and (6) infringements** EUR 20 million or 4% of worldwide (group) annual turnover, whichever is higher The caps of GDPR apply.
How we help	Outsourced DPO Service Data Protection Compliance Audit

NATIONAL LAW UNDER CER · NO DRAFT YET

CER

Not yet adopted; the bill before Congress would make the Secretary of State for Security the national authority for critical entities in Spain.

Key dates	**17 Oct 2024** Transposition deadline **6 Oct 2026** Bill lapsed on dissolution of the Cortes
Incident reporting	**First notice** Within 24 hours of becoming aware **Final report** Within one month of the initial notification, where relevant To: Competent authority
How we help	NIS2 Compliance Assessment Incident Reporting Desk

NATIONAL LAW UNDER EPRIVACY · IN FORCE

ePrivacy (LSSI)

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

NATIONAL LAW UNDER PLD · NO NATIONAL ACT YET

PLD

Not yet transposed; no draft has been published and the product liability regime of the consumer protection law continues to apply.

Key dates	**9 Dec 2026** Transposition deadline (coming up)
How we help	Cyber Resilience Act Readiness Assessment

NATIONAL LAW UNDER PSD2 · IN FORCE

PSD2

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

NATIONAL LAW · APPLIES SINCE 5 MAY 2022

ENS

Sets binding security measures for the Spanish public sector and its suppliers, with conformity certification for medium and high category systems.

Key dates	**5 May 2022** In force **5 May 2024** End of the 24-month adaptation period
How we help	ISO 27001 Implementation

NATIONAL LAW · APPLIES SINCE 16 MAY 2003

Ley 41/2002

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

NATIONAL LAW · APPLIES SINCE 30 APRIL 2011

Ley PIC

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

NATIONAL LAW · APPLIES SINCE 30 JUNE 2022

LGTel

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

NATIONAL LAW · APPLIES FROM 22 NOVEMBER 2026

Real Decreto 1032/2026

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

AI Omnibus

Amends the AI Act to postpone high-risk obligations, extend SME relief to small mid-caps and add bans on AI-generated intimate and abuse imagery.

Key dates	**27 Jul 2026** Enters into force **2 Dec 2026** New prohibitions apply (coming up) **2 Dec 2027** High-risk requirements for Annex III systems apply (coming up)
How we help	EU AI Act Readiness Assessment

EU REGULATION, APPLIES DIRECTLY · IN FORCE SINCE 10 DECEMBER 2024

CRA

Sets cybersecurity requirements for hardware and software products sold in the EU, with vulnerability reporting and CE marking for manufacturers.

Key dates	**11 Sep 2026** Reporting obligations apply **11 Dec 2027** All obligations apply (coming up) **11 Jun 2028** Last day earlier type-examination certificates stay valid (coming up)
Incident reporting	**First notice** Within 24 hours of becoming aware **Incident notification** Within 72 hours of becoming aware **Intermediate report** On request of the coordinating CSIRT **Final report** Within one month of the incident notification To: Coordinating CSIRT and ENISA, via the single reporting platform
Maximum fines	**Article 64(2) essential requirements and Articles 13 and 14** EUR 15 million or 2.5% of worldwide (group) annual turnover, whichever is higher **Article 64(3) other listed obligations** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher **Article 64(4) incorrect, incomplete or misleading information** EUR 5 million or 1% of worldwide (group) annual turnover, whichever is higher
How we help	Cyber Resilience Act Readiness Assessment

EU REGULATION, APPLIES DIRECTLY · IN FORCE SINCE 4 FEBRUARY 2025

Cyber Solidarity Act

Builds EU capacity to detect and respond to large-scale cyber incidents through cyber hubs, an emergency mechanism and a cybersecurity reserve.

Key dates	**15 Jan 2025** Published in the Official Journal **4 Feb 2025** Enters into force and applies

How we help Incident Response Plan and Exercise

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 27 JUNE 2019

Cybersecurity Act

Gives ENISA a permanent mandate and sets up the EU certification framework for ICT products, services and processes, starting with EUCC.

Key dates **27 Jun 2019** In force
27 Feb 2025 EUCC scheme applies

Supervisors European Union Agency for Cybersecurity (ENISA) Competent authority

How we help Penetration Testing

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 12 SEPTEMBER 2025

Data Act

Gives users of connected products the right to access and share the data they generate, and makes switching cloud providers easier.

Key dates **12 Sep 2025** Requirements apply
12 Jan 2027 Switching charges abolished (coming up)
12 Sep 2027 Chapter IV reaches older long-term contracts (coming up)

Maximum fines **Article 40(4): Chapters II, III and V, fines by data protection authorities within their competence; all other fines are set nationally** EUR 20 million or 4% of worldwide (group) annual turnover, whichever is higher

How we help Outsourced DPO Service

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 24 SEPTEMBER 2023

DGA

Sets requirements for re-using protected public sector data, for data intermediation services and for data altruism organisations in the EU.

Key dates **23 Jun 2022** Enters into force
24 Sep 2023 Requirements apply
24 Sep 2025 Transitional period ends for intermediation services provided on 23 June 2022

How we help Outsourced DPO Service

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 2 MAY 2023

DMA

Sets conduct requirements for designated gatekeeper platforms so digital markets stay open to competitors and fair to business users and consumers.

Key dates **2 May 2023** Requirements apply

Supervisors European Commission Competent authority

How we help Government Relations as-a-Service

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 17 FEBRUARY 2024

DSA

Sets requirements for online intermediaries in the EU on illegal content, user transparency and, for the largest platforms, systemic risk management.

Key dates	**25 Aug 2023** Obligations apply to the first very large platforms and search engines **17 Feb 2024** Applies to all providers
Supervisors	European Commission Competent authority
How we help	DSA Compliance Review

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

EHDS

Gives people access to their electronic health data across the EU, sets requirements for EHR systems and governs secondary use of health data.

Key dates	**11 Oct 2026** Dataset metadata implementing regulation (EU) 2026/2098 in force **26 Mar 2027** EHDS applies, apart from the provisions phased in from 2029 (coming up) **26 Mar 2029** Priority categories, EHR systems and most secondary use requirements apply (coming up)
How we help	Outsourced DPO Service

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

eIDAS 2

Requires each Member State to offer digital identity wallets that banks and large platforms must accept, and adds new qualified trust services.

Key dates	**20 May 2024** In force **23 Feb 2027** Reference formats for advanced signatures and seals apply (coming up) **17 May 2027** Transitional accreditation of trust service assessment bodies ends (coming up)
How we help	CISO as-a-Service

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 26 MAY 2021

MDR

Sets safety and performance requirements for medical devices and software on the EU market, including protection against unauthorised access.

Key dates	**26 May 2021** Requirements apply **31 Dec 2027** End of transition for class III and implantable class IIb legacy devices (coming up) **31 Dec 2028** End of transition for other legacy devices (coming up)
How we help	CISO as-a-Service

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 30 DECEMBER 2024

MiCA

Requires crypto-asset issuers and service providers in the EU to obtain authorisation, publish white papers and meet conduct requirements.

Key dates
30 Dec 2024 Requirements apply
1 Jul 2026 Transitional period for crypto-asset service providers ends at the latest
31 Dec 2027 Trading platforms ensure white papers for crypto-assets admitted to trading before 30 December 2024 (coming up)

How we help
MiCA Compliance Audit

EU REGULATION, APPLIES DIRECTLY · APPLIES IN STAGES

NCCS

Requires high-impact and critical-impact electricity entities to assess cyber risk, apply minimum or advanced controls and manage supply chain risk.

Key dates
13 Jun 2024 Enters into force

How we help
IEC 62443 Security Assessment

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 22 FEBRUARY 2026

Part-IS

Requires aviation organisations and authorities to run an information security management system and report incidents that could affect safety.

Key dates
16 Oct 2025 Regulation (EU) 2022/1645 applies
22 Feb 2026 Regulation (EU) 2023/203 applies

Supervisors
European Union Aviation Safety Agency (EASA) Competent authority
State Aviation Safety Agency (AESA) Competent authority

How we help
ISO 27001 Implementation

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 1 AUGUST 2025

RED DA

Requires internet-connected radio equipment, toys and wearables to protect networks and personal data and to guard against fraud.

Key dates
1 Feb 2022 Enters into force
1 Aug 2025 Requirements apply

How we help
Penetration Testing

EU REGULATION, APPLIES DIRECTLY · APPLIES SINCE 7 JULY 2024

UN R155 / R156

Makes certified cyber security and software update management systems a condition of type approval for new cars, vans, buses and trucks.

Key dates **6 Jul 2022** EU: mandatory for new vehicle types
7 Jul 2024 EU: mandatory for all newly registered vehicles

How we help CISO as-a-Service

STANDARD · IN FORCE

CCN-STIC

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

STANDARD · IN FORCE

TIBER-ES

Not yet reviewed: our review of this requirement is still open, so its facts are not in this digest.

Requirements by Sector

SECTOR	REQUIREMENTS	STANDARDS	SUPERVISORS
Technology and Telecom	LGTel, Real Decreto 1032/2026, ENS, ePrivacy (LSSI), CRA, DMA, DSA, Data Act	CCN-STIC, GSMA NESAS, ISO 27001, SOC 2, ISO 22301	CNMC
Financial Services and Insurance	PSD2, MiCA, eIDAS 2, GDPR (LOPDGDD), NIS2, Ley PIC	TIBER-ES, Swift CSP, PCI DSS, HITRUST, ISO 27799	Bank of Spain, Directorate-General for Insurance and Pension Funds, CNMV, EBA, ECB, EIOPA
Healthcare and Life Sciences	Ley 41/2002, EHDS, MDR, PLD (No national act yet), GDPR (LOPDGDD), CER, Ley PIC	HITRUST, ISO 27799, SOC 2, IEC 80001-1, IEC 81001-5-1	AEMPS
Manufacturing and Chemicals	RED DA, PLD (No national act yet), CRA, Data Act, NIS2, Ley PIC	IEC 62443, ISO 27001, NIST CSF, CLC/TS 50701, ETSI EN 303 645	
Automotive and Transportation	UN R155 / R156, Data Act, NIS2, CER, Ley PIC	TISAX, ISO/SAE 21434, ISO 24089, ISO 27001, NIST CSF	CNMC
Retail, Consumer and Leisure	ePrivacy (LSSI), DMA, DSA, eIDAS 2, GDPR (LOPDGDD), CER, Ley PIC	PCI DSS, ETSI EN 303 645, ISO/IEC 27701, NIST Privacy Framework, CIS Controls	
Public Sector and Defence	DGA, ENS, eIDAS 2, GDPR (LOPDGDD), NIS2, CER, Ley PIC	CCN-STIC, ISO 27001, COBIT, ISO/IEC 27701, NIST Privacy Framework	
Energy and Utilities	NCCS, NIS2, CER, Ley PIC	IEC 62443, ISO 27001, IEC 62351, ISO/IEC 27019, CIS Controls	CNMC

Aviation and Space	Part-IS, CER, Ley PIC	ISO 27001, ED-202A / DO-326A, ISO 9001, ISO 31000, ISO/IEC 27005	AESA, EASA

Who Supervises

SUPERVISOR	SUPERVISES	WEBSITE
CCN-CERT of the National Cryptologic Centre CCN-CERT	NIS2	ccn-cert.cni.es
INCIBE-CERT of the National Cybersecurity Institute INCIBE-CERT	NIS2	incibe.es
National Securities Market Commission CNMV	DORA	cnmv.es
Spanish Data Protection Agency AEPD	GDPR (LOPDGDD)	aepd.es
State Aviation Safety Agency AESA	Part-IS	seguridadaerea.gob.es
Bank of Spain	DORA	bde.es
Directorate-General for Insurance and Pension Funds	DORA	dgsfp.mineco.es
European Commission EU level	DMA, DSA	commission.europa.eu
European Union Agency for Cybersecurity ENISA EU level	Cybersecurity Act	enisa.europa.eu
European Union Aviation Safety Agency EASA EU level	Part-IS	easa.europa.eu

How GRC+ Helps

We never audit work our own team runs for you. A team of four to five practitioners, under one contract for every country you operate in.

Stay Compliant Ongoing work: pay as you go or monthly.	Incident Reporting Desk Vendor Risk Management EU and UK Representative CISO as-a-Service Outsourced DPO Service AI Governance Officer as-a-Service Compliance Officer as-a-Service Internal Audit as-a-Service Government Relations as-a-Service

Audit or Assess An independent view, because a regulation requires one or because you want to know for yourself. We never audit a role our own team runs for you.	Swift CSP Assessment ISO 27001 Internal Audit NIS2 Compliance Assessment DORA Compliance Audit Data Protection Compliance Audit PCI DSS Readiness Assessment EU AI Act Readiness Assessment SOC 2 and Assurance Report Review DSA Compliance Review IEC 62443 Security Assessment MiCA Compliance Audit Security Maturity Assessment Post-Quantum Cryptography Readiness Assessment PSD2 SCA Audit Security Architecture Review Cyber Resilience Act Readiness Assessment ISO 42001 Internal Audit ISO 27701 Internal Audit Data Protection Impact Assessment (DPIA)
Build and Fix One-off work that closes the gaps.	NIS2 Readiness Programme DORA Gap Remediation AI Act Compliance Programme ISO 27001 Implementation Incident Response Plan and Exercise
Security Testing Tests that show whether attacks are detected and stopped.	Red Teaming Penetration Testing Cloud Security Assessment Source Code Review

Talk to Us

Thirty minutes with a principal consultant on what applies to you and what to do first.

Book a 30-Minute Call · sales@grc.plus · +31 20 241 66 00

Dates and requirements come from the GRC+ regulation pages and change as they do. The latest version: grc.plus/es