GRC+ DIGEST · 21 NOVEMBER 2026

# Netherlands Digest

What applies in the Netherlands, 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 |
| **1 Mar 2027** | DORA | Register of information due to DNB |
| **2 Aug 2027** | AI Act | Existing general-purpose AI models must comply |

## Three Requirements to Look at First

NATIONAL LAW UNDER NIS2 · IN FORCE

### NIS2 (CBW)

| | |
|---|---|
| Key dates | **3 Nov 2026** Exemption decree for four investigation units enters into force<br>**15 Aug 2028** Existing board members complete their training (coming up) |
| 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 | NCSC, Z-CERT, CERT-WM, SURFcert, RDI, ILT, ANVS, NVWA, IGJ, DNB, AFM, Inspectorate of Education |

NATIONAL LAW UNDER DORA · IN FORCE

### DORA

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 Act

| | |
|---|---|
| Key dates | **2 Aug 2026** Transparency duties apply, the general date of application<br>**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 · IN FORCE

## NIS2 (CBW)

Transposes the directive into Dutch law: around 8,000 organisations register with the NCSC, report incidents in 24 hours and meet a duty of care.

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|---|---|
| Key dates | **15 Aug 2026** CBW and CBB in force and registration deadline<br>**3 Nov 2026** Exemption decree for four investigation units enters into force<br>**15 Aug 2028** Existing board members complete their training (coming up) |
| Supervisors | National Cyber Security Centre (NCSC) CSIRT<br>Z-CERT (Z-CERT) CSIRT<br>Water Boards CERT (CERT-WM) CSIRT<br>SURFcert CSIRT<br>Dutch Authority for Digital Infrastructure (RDI) Competent authority<br>Human Environment and Transport Inspectorate (ILT) Competent authority<br>Authority for Nuclear Safety and Radiation Protection (ANVS) Competent authority<br>Netherlands Food and Consumer Product Safety Authority (NVWA) Competent authority<br>Health and Youth Care Inspectorate (IGJ) Competent authority<br>Dutch Central Bank (DNB) Competent authority<br>Dutch Authority for the Financial Markets (AFM) Competent authority<br>Inspectorate of Education Competent authority |
| Incident reporting | **Early warning** Without undue delay and in any event within 24 hours of becoming aware<br>**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)<br>**Intermediate report** On request<br>**Final report** Within one month of the incident notification<br>To: CSIRT or competent authority |
| Maximum fines | **Essential** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher<br>**Important** EUR 7 million or 1.4% of worldwide (group) annual turnover, whichever is higher |
| Managers | Managers can be held personally liable; Managers can be temporarily banned from their role |
| How we help | NIS2 Compliance Assessment<br>Incident Reporting Desk |

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NATIONAL LAW UNDER DORA · IN FORCE

## DORA

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

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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<br>**2 Dec 2026** Marking of synthetic content, for systems already on the market (coming up)<br>**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<br>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<br>**Article 99(4) operator and notified body obligations** EUR 15 million or 3% of worldwide (group) annual turnover, whichever is higher<br>**Article 99(5) incorrect, incomplete or misleading information** EUR 7.5 million or 1% of worldwide (group) annual turnover, whichever is higher<br>**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 Netherlands

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

NATIONAL LAW UNDER GDPR · IN FORCE

### GDPR (UAVG)

Applies the regulation in the Netherlands, with the Autoriteit Persoonsgegevens as supervisor and requirements on special categories and the BSN.

| | |
|---|---|
| Key dates | **25 May 2018** Entered into force<br>**1 Sep 2026** Article 21b in force: the AP publishes its sanction decisions |
| Supervisors | Dutch Data Protection Authority (AP) Data protection authority |
| Incident reporting | **Notification to the supervisory authority** Without undue delay and, where feasible, within 72 hours of becoming aware<br>**Intermediate report** In phases, without undue further delay<br>To: Competent supervisory authority |
| Maximum fines | **Article 83(4) infringements** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher<br>**Article 83(5) and (6) infringements** EUR 20 million or 4% of worldwide (group) annual turnover, whichever is higher<br>The caps of GDPR apply. |
| How we help | Outsourced DPO Service<br>Data Protection Compliance Audit |

NATIONAL LAW UNDER CER · IN FORCE

### CER (Wwke)

Transposes the directive into Dutch law, with sector ministers designating critical entities and the Minister of Justice and Security coordinating.

| | |
|---|---|
| Key dates | **8 Jul 2026** Adopted<br>**15 Aug 2026** Entered into force |
| Incident reporting | **First notice** Within 24 hours of becoming aware<br>**Final report** Within one month of the initial notification, where relevant<br>To: Competent authority |
| How we help | NIS2 Compliance Assessment<br>Incident Reporting Desk |

NATIONAL LAW UNDER EPRIVACY · IN FORCE

## ePrivacy (Tw)

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

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NATIONAL LAW UNDER PLD · ADOPTED, NOT YET IN FORCE

## PLD

Adopted by both chambers and awaiting publication in the Staatsblad; the act amends the product liability section of the Civil Code and keeps the development-risk defence.

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|---|---|
| Key dates | **10 Nov 2026** Adopted<br>**9 Dec 2026** Transposition deadline (coming up) |
| How we help | Cyber Resilience Act Readiness Assessment |

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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.

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NATIONAL LAW · IN FORCE

## Wabvpz

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

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NATIONAL LAW · APPLIES SINCE 1 JULY 2023

## Wegiz

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

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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<br>**2 Dec 2026** New prohibitions apply (coming up)<br>**2 Dec 2027** High-risk requirements for Annex III systems apply (coming up) |
| How we help | EU AI Act Readiness Assessment |

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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.

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|---|---|
| Key dates | **11 Sep 2026** Reporting obligations apply<br>**11 Dec 2027** All obligations apply (coming up)<br>**11 Jun 2028** Last day earlier type-examination certificates stay valid (coming up) |
| Incident reporting | **First notice** Within 24 hours of becoming aware<br>**Incident notification** Within 72 hours of becoming aware<br>**Intermediate report** On request of the coordinating CSIRT<br>**Final report** Within one month of the incident notification<br>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<br>**Article 64(3) other listed obligations** EUR 10 million or 2% of worldwide (group) annual turnover, whichever is higher<br>**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.

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|---|---|
| Key dates | **15 Jan 2025** Published in the Official Journal<br>**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.

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|---|---|
| Key dates | **27 Jun 2019** In force<br>**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.

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|---|---|
| Key dates | **12 Sep 2025** Requirements apply<br>**12 Jan 2027** Switching charges abolished (coming up)<br>**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

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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

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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

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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

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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.

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|---|---|
| Key dates | **16 Oct 2025** Regulation (EU) 2022/1645 applies<br>**22 Feb 2026** Regulation (EU) 2023/203 applies |
| Supervisors | European Union Aviation Safety Agency (EASA) Competent authority<br>Human Environment and Transport Inspectorate (ILT) 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<br>**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.

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|---|---|
| Key dates | **6 Jul 2022** EU: mandatory for new vehicle types<br>**7 Jul 2024** EU: mandatory for all newly registered vehicles |
| How we help | CISO as-a-Service |

STANDARD · APPLIES SINCE 1 JANUARY 2026

## ABRO 2026

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

STANDARD · APPLIES SINCE 15 AUGUST 2026

## BIO2

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

STANDARD · APPLIES SINCE 1 AUGUST 2022

## DigiD assessment

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

STANDARD · APPLIES SINCE 1 JUNE 2026

## NEN 7510

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

STANDARD · IN FORCE

### TIBER-NL

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 |
|---|---|---|---|
| **Automotive and Transportation** | UN R155 / R156, Data Act, NIS2 (CBW), CER (Wwke) | TISAX, ISO/SAE 21434, ISO 27001, NIST CSF, ISO 24089 | ILT, RDI, NCSC, ACM |
| **Technology and Telecom** | ePrivacy (Tw), CRA, DMA, DSA, Data Act, eIDAS 2, GDPR (UAVG), NIS2 (CBW) | GSMA NESAS, SOC 2, ISO 22301, AIUC-1, ISO/IEC 27017 | RDI, ACM, AP |
| **Financial Services and Insurance** | DORA, PSD2, MiCA, eIDAS 2, GDPR (UAVG), NIS2 (CBW) | TIBER-NL, DigiD assessment, Swift CSP, PCI DSS, HITRUST | DNB, AFM, EBA, ECB, EIOPA, ESMA |
| **Energy and Utilities** | NCCS, NIS2 (CBW), CER (Wwke) | BIO2, IEC 62443, ISO 27001, IEC 62351, ISO/IEC 27019 | RDI, ANVS, ACM, ILT |
| **Aviation and Space** | Part-IS, CER (Wwke) | ABRO 2026, ISO 27001, ED-202A / DO-326A, ISO 9001, ISO 31000 | ILT, NCSC, RDI, EASA |
| **Healthcare and Life Sciences** | Wabvpz, Wegiz, EHDS, MDR, PLD, GDPR (UAVG), CER (Wwke) | NEN 7510, DigiD assessment, HITRUST, ISO 27799, SOC 2 | IGJ, Z-CERT, AP, Medicines Evaluation Board |
| **Retail, Consumer and Leisure** | ePrivacy (Tw), DMA, DSA, eIDAS 2, GDPR (UAVG), CER (Wwke) | PCI DSS, ETSI EN 303 645, ISO/IEC 27701, NIST Privacy Framework, CIS Controls | ACM, AP, NVWA, RDI |
| **Public Sector and Defence** | DGA, eIDAS 2, GDPR (UAVG), NIS2 (CBW), CER (Wwke) | ABRO 2026, BIO2, DigiD assessment, COBIT, ISO 27001 | NCSC, AP, CERT-WM, RDI, Inspectorate of Education |
| **Manufacturing and Chemicals** | RED DA, PLD, CRA, Data Act, NIS2 (CBW) | IEC 62443, ISO 27001, NIST CSF, CLC/TS 50701, ETSI EN 303 645 | RDI |

## Who Supervises

| SUPERVISOR | SUPERVISES | WEBSITE |
|---|---|---|
| **Authority for Nuclear Safety and Radiation Protection** ANVS | NIS2 (CBW) | autoriteitnvs.nl |
| **Dutch Authority for Digital Infrastructure** RDI | NIS2 (CBW) | rdi.nl |
| **Dutch Authority for the Financial Markets** AFM | NIS2 (CBW) | afm.nl |
| **Dutch Central Bank** DNB | NIS2 (CBW) | dnb.nl |
| **Dutch Data Protection Authority** AP | GDPR (UAVG) | autoriteitpersoonsgegevens.nl |
| **Health and Youth Care Inspectorate** IGJ | NIS2 (CBW) | igj.nl |
| **Human Environment and Transport Inspectorate** ILT | NIS2 (CBW), Part-IS | ilent.nl |
| **National Cyber Security Centre** NCSC | NIS2 (CBW) | ncsc.nl |
| **Netherlands Food and Consumer Product Safety Authority** NVWA | NIS2 (CBW) | nvwa.nl |
| **Water Boards CERT** CERT-WM | NIS2 (CBW) | cert-wm.nl |
| **Z-CERT** Z-CERT | NIS2 (CBW) | z-cert.nl |
| **Inspectorate of Education** | NIS2 (CBW) | onderwijsinspectie.nl |
| **SURFcert** | NIS2 (CBW) | surf.nl/en/services/security/surfcert |
| **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**<br>Ongoing work: pay as you go or monthly. | Incident Reporting Desk<br>Vendor Risk Management<br>EU and UK Representative<br>CISO as-a-Service<br>Outsourced DPO Service<br>AI Governance Officer as-a-Service<br>Compliance Officer as-a-Service<br>Internal Audit as-a-Service<br>Government Relations as-a-Service |
| **Audit or Assess**<br>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<br>ISO 27001 Internal Audit<br>NIS2 Compliance Assessment<br>DORA Compliance Audit<br>Data Protection Compliance Audit<br>PCI DSS Readiness Assessment<br>EU AI Act Readiness Assessment<br>SOC 2 and Assurance Report Review<br>DSA Compliance Review<br>IEC 62443 Security Assessment<br>MiCA Compliance Audit<br>Security Maturity Assessment<br>Post-Quantum Cryptography Readiness Assessment<br>PSD2 SCA Audit<br>Security Architecture Review<br>Cyber Resilience Act Readiness Assessment<br>ISO 42001 Internal Audit<br>ISO 27701 Internal Audit<br>Data Protection Impact Assessment (DPIA) |
| **Build and Fix**<br>One-off work that closes the gaps. | NIS2 Readiness Programme<br>DORA Gap Remediation<br>AI Act Compliance Programme<br>ISO 27001 Implementation<br>Incident Response Plan and Exercise |
| **Security Testing**<br>Tests that show whether attacks are detected and stopped. | Red Teaming<br>Penetration Testing<br>Cloud Security Assessment<br>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/nl