EU RegCORE Client Alert

Financial Services
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The EU Credit Servicers Directive: Market transformation and the path ahead

QuickTake

The EU's Credit Servicers Directive (**CSD**) has fundamentally reshaped the European market for non-performing loans (**NPLs**). An NPL is, broadly, a loan in respect of which the borrower has failed to make scheduled payments for a specified period (typically 90 days or more) or where repayment in full is considered unlikely. Two years after full implementation, this EU Directive has catalysed significant structural change: market consolidation is accelerating, pan-European servicing platforms are emerging and the competitive landscape is being redrawn. With NPL rates resurging in 2026 due to compounding economic developments, the strategic question is no longer simply "how do we comply?" but rather "how do we position ourselves to succeed in a market that the CSD has transformed?"

Three key themes emerge. First, harmonisation has advanced but remains incomplete despite the CSD's text and aims: (regrettably) national divergences in definitions, consumer protections and supervisory practice of national competent authorities (**NCAs**)—the designated regulatory bodies in each Member State responsible for authorising and supervising credit servicers and credit purchasers—create both complexity and opportunity.

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Second, the regulatory trajectory is clear: supervisory expectations are intensifying, borrower outcomes are under scrutiny and enforcement is becoming more muscular. Third, the market is consolidating: smaller servicers face margin pressure, while larger players with pan-European reach and technology-enabled operations are gaining share. Firms that understand these dynamics-and act on them-will be best positioned for success.

The European Commission's review of the CSD, delivered in December 2025, signals further evolution ahead. The Commission examined borrower protection standards, supervisory convergence and passporting effectiveness-and further amendments to the framework are anticipated. Financial services firms should expect continued regulatory tightening, not relaxation.

This Client Alert provides a strategic perspective on the CSD's market impact, regulatory trajectory and the evolving supervisory landscape for both credit servicers, purchasers and other stakeholders. This Client Alert should be read alongside PwC Legal's country-specific coverage and our ongoing analysis of the Consumer Credit Directive (**CCD II**), the Mortgage Credit Directive (**MCD**) and related developments available from the EU RegCORE centre.

Market transformation: What the CSD has changed

The CSD has created a regulated, passportable framework for credit servicing across the EU-but its real significance lies in how it is reshaping market structure and competitive dynamics.

Consolidation and scale

The authorisation and passporting regime has accelerated market consolidation. Under this regime, a credit servicer authorised in one EU Member State (its “home” Member State) may provide services in other Member States (“host” Member States) without obtaining a separate authorisation in each jurisdiction—a process known as “passporting”. Smaller, single-jurisdiction servicers face increased compliance costs and struggle to compete with larger players that can spread regulatory overhead across multiple markets. The result: fewer, larger, pan-EU credit servicers are emerging as dominant market participants. For credit purchasers, this means a shrinking pool of potential servicer partners-but also access to more sophisticated, technology-enabled operations with genuine cross-border capability.

The rise of pan-European platforms

Passporting has enabled the development of genuinely pan-European servicing platforms. Leading servicers are now building centralised operations-often supported by significant technology investment-that can service portfolios across multiple jurisdictions from a single authorisation base. This is transforming the economics of NPL servicing and creating new competitive dynamics. Winners will be those with the operational scale, technology capability and regulatory expertise to serve the largest credit purchasers across the EU.

Non-EU investors and the representative model

The CSD's requirement for non-EU credit purchasers to appoint an EU-established representative has created a new market niche—and new complexity for global investors. Non-EU funds acquiring EU NPL portfolios must now establish substantive representative arrangements, not merely nominal or 'letterbox' presences. NCAs have made clear that representatives must have genuine capacity to fulfil CSD obligations, including cooperation with supervisors and handling of borrower complaints. For non-EU investors, this adds cost and operational burden; for EU-based service providers, it creates opportunity.

Key strategic implication: The CSD has raised barriers to entry and is driving market consolidation. Firms must decide whether to invest in scale and cross-border capability—or partner with those who have.

Definition of credit servicer

A credit servicer is a legal person that, on behalf of a credit purchaser, carries out one or more of the following credit servicing activities in relation to a creditor's rights under a non-performing credit agreement issued by a credit institution (i.e. a bank or other entity authorised to take deposits or other repayable funds from the public and to grant credits for its own account under Regulation (EU) No 575/2013 i.e. the **CRR**) or the non-performing credit agreement itself:

- collecting or recovering from the borrower any payments due related to a creditor's rights under a credit agreement or to the credit agreement itself;[1]
- renegotiating with the borrower any terms and conditions related to a creditor's rights under a credit agreement or of the credit agreement itself in line with the instructions given by the credit purchaser;
- administering any complaints relating to a creditor's rights under a credit agreement or to the credit agreement itself; and
- informing the borrower of any changes in interest rates or charges or of any payments due related to a creditor's rights under a credit agreement or to the credit agreement itself.

Definition of credit purchaser

A credit purchaser is any individual or legal entity, other than a credit institution or a subsidiary of a credit institution, that acquires creditor's rights under a non-performing credit agreement or the non-performing credit agreement itself as part of their commercial, business, or professional activities.

The regulatory framework: What firms must get right

The CSD establishes a harmonised baseline for authorisation, conduct and supervision. While the detailed requirements are set out below, the strategic imperative is clear: firms that treat CSD compliance as a tick-box exercise will underperform. NCAs are increasingly focused on substance over form-and supervisory scrutiny of governance, borrower treatment and outsourcing arrangements is intensifying.

[1] Importantly the CSD does not apply to all types of debt collection agencies unless they carry out a CSD activity. Regulating the procedures for debt collection across all of the Member States has been a longstanding EU priority for some time now. One significant achievement was the implementation of the European Account Preservation Order (**EAPO**), a mechanism for the recovery of debts that are owed across international borders. This was accomplished by Regulation (EU) No. 655/2014. Debtors whose bank accounts are situated in EU Member States are able to have their accounts frozen thanks to the EAPO. However, there is no unified regulatory framework that applies to debt collection services and debt collection companies. This is a significant limitation. Instead, each Member State is subject to a unique set of national principles and regulations.

- **Authorisation and passporting.** Credit servicers need to obtain authorisation from the home Member State to carry out credit servicing activities. Credit servicers authorised in one Member State can provide credit servicing activities in other Member States provided the home Member State NCA and the relevant host NCA are notified. The European Banking Authority (EBA) has published its final Guidelines on the assessment of adequate knowledge and experience of the management or administrative organ of a credit servicer.[2] The Guidelines, which have applied from 27 June 2024, establish a "fit and proper" regime for credit servicers under the CSD. Under fit and proper requirements, the individuals who direct or manage a regulated entity must demonstrate that they are of good repute (i.e. honest and of integrity) and possess the knowledge, skills and experience necessary to fulfil their responsibilities. The management or administrative organ of a credit servicer, as a whole, should be of sufficiently good repute and adequate knowledge and experience to conduct the business in a competent and responsible manner. The Guidelines specify the criteria for the assessment of the organs' collective knowledge and experience. This assessment is to be carried out by the relevant NCA based on the business model of the credit services and the principle of proportionality. The Guidelines also set out the assessment process by credit servicers and NCAs.

- **Relationship with borrowers and core conduct requirements.** The CSD establishes a harmonised set of conduct requirements governing how credit servicers must interact with borrowers. These core obligations apply throughout the EU and form the baseline against which national transposition measures and supervisory expectations are assessed. The principal requirements are as follows:

  - **Fair treatment and good faith.** Credit servicers must act in good faith and treat borrowers fairly and respectfully at all times. This includes conducting all communications and negotiations in a professional manner, taking into account the borrower's circumstances and avoiding any conduct that could be considered aggressive, coercive or unduly pressurising.

  - **Prohibition on misleading or harassing conduct.** Credit servicers must not mislead borrowers or provide inaccurate information regarding their obligations, the status of their loan or the consequences of non-payment. They must also refrain from harassing borrowers, including through excessive or unreasonable contact, threats or any form of intimidation.

  - **Transparency and information provision.** Credit servicers must provide borrowers with clear, accurate and timely information. In particular, borrowers must be notified of any transfer of their loan (whether by sale or assignment) and, ahead of the first debt collection following such transfer, must receive specific information including: (i) the date of transfer; (ii) the identity and contact details of the new credit servicer or credit purchaser; (iii) confirmation of the new servicer's authorisation status; and (iv) detailed information on the amounts due, including any interest, fees or charges.

  - **Complaints handling.** Credit servicers must establish and maintain effective procedures for receiving, investigating and resolving borrower complaints. Complaints must be handled promptly, fairly and free of charge. Borrowers must be informed of the complaints procedure and, where applicable, of any external dispute resolution mechanisms available to them, including access to national ombudsman schemes or alternative dispute resolution bodies.

  - **Privacy and data protection.** Credit servicers must respect the privacy and confidentiality of borrowers and comply with applicable data protection requirements, including the General Data Protection Regulation (GDPR). Personal data must be processed lawfully, fairly and transparently, and borrowers must be informed of how their data will be used in connection with credit servicing activities.

[2] Available here.

These core conduct requirements apply equally to credit purchasers in their dealings with borrowers, as set out further below. Member States may impose additional or more detailed consumer protection measures, and firms should consult the country-specific sections of this Client Alert for guidance on local variations and supervisory expectations.

- **Contract between the credit servicer and credit purchaser.** The relationship between a credit servicer and a credit purchaser must be governed by a written contract. The contract must clearly set out the rights and obligations of both parties, including the scope of credit servicing activities to be performed by the servicer on behalf of the purchaser. The contract should specify the servicer's record-keeping obligations and ensure that the purchaser has access to relevant records as needed for compliance or audit purposes. The contract must address data protection and confidentiality obligations, ensuring compliance with the General Data Protection Regulation (GDPR) and any additional national requirements. The contract must facilitate cooperation with NCAs, including the provision of information and access to records as required for supervisory purposes.

- **Recordkeeping and reporting.** Credit servicers must maintain comprehensive records of all servicing activities, communications and instructions for a minimum of 10 years from the end of the relevant credit agreement or servicing relationship. This 10-year period represents the minimum standard under the Directive; national transposition measures or other applicable regulatory regimes (such as anti-money laundering and counter-terrorist financing (AML/CTF) requirements, tax law or sector-specific rules) may impose longer retention periods, and firms should ensure their recordkeeping policies reflect the most stringent applicable requirements in each jurisdiction. Regular reporting to NCAs is mandatory, including updates on authorisation status, management changes and significant events.

- **Outsourcing and internal controls.** Outsourcing of credit servicing activities is permitted but subject to strict oversight, contractual requirements and notification to the NCA. Firms must maintain robust internal controls, risk management frameworks and ensure all staff are adequately trained on CSD requirements. In addition, credit servicers that fall within the scope of the Digital Operational Resilience Act (DORA)-Regulation (EU) 2022/2554, which has applied since 17 January 2025-must ensure that their information and communication technology (ICT) risk management frameworks, incident reporting procedures and arrangements with ICT third-party service providers comply with DORA's requirements. This is particularly relevant where credit servicing activities rely on critical or important ICT functions provided by third parties, as DORA imposes specific contractual, oversight and exit strategy obligations in respect of such arrangements. Credit servicers should assess whether their operational and outsourcing arrangements give rise to DORA obligations and, where applicable, integrate DORA compliance into their broader internal control and resilience frameworks.

- **EBA Guidelines and supervisory practice.** The EBA's Guidelines on the fit and proper assessment of credit servicers' management bodies have applied since 27 June 2024 and are now fully integrated into national supervisory assessments. In addition, the EBA finalised its Guidelines on complaints handling for credit servicers in late 2024, with application across all NCAs from early 2025. NCAs have begun thematic inspections, with particular focus on governance, borrower engagement, outsourcing arrangements and-although not a core requirement of the CSD itself-the management of money laundering and terrorist financing risks, which NCAs increasingly view as relevant to the NPL sector given the nature of the underlying transactions.

- Beyond the issuance of binding Guidelines, the EBA plays a broader role in promoting supervisory convergence across the CSD framework. This includes the development of common templates and reporting formats to facilitate consistent data collection by NCAs, the operation of a Q&A process through which NCAs and market participants can seek clarification on the interpretation of CSD provisions and related EBA instruments, and the coordination of peer reviews to assess how NCAs are applying the CSD and associated Guidelines in practice. The EBA also maintains a central hub of information on national registers and facilitates information-sharing between home and host NCAs in the context of passporting notifications.

- These convergence tools are intended to reduce fragmentation and promote a more consistent supervisory approach across the EU. However, it should be recognised that supervisory convergence under the CSD remains a work in progress. The relatively recent application of the framework means that divergent national practices have not yet been fully identified or addressed, and the effectiveness of the EBA's convergence mechanisms will depend on the willingness of NCAs to align their approaches over time. Market participants should therefore remain attentive to jurisdiction-specific supervisory expectations and not assume that a single, uniform supervisory standard has yet been achieved in practice.

- **Consumer protection interplay.** The EU's CCD II was adopted in 2023 and required transposition by Member States by 20 November 2025, with application from November 2026. Credit servicers and purchasers must therefore prepare for an additional layer of consumer protection standards that will overlap with CSD obligations. The MCD also remains under further review, with the Commission expected to propose reforms that will align with CSD and CCD II borrower protection standards.

- **Interaction with the EU Securitisation Regulation.** Where NPLs are transferred to a securitisation special purpose entity (SSPE)—a legal entity established for the purpose of carrying out one or more securitisations, the assets of which are isolated from those of the originator—and subsequently securitised, the regulatory framework governing credit servicing may overlap with the requirements of the EU Securitisation Regulation (Regulation (EU) 2017/2402, as amended). The Securitisation Regulation imposes its own governance, risk retention, transparency and due diligence obligations on parties to a securitisation transaction, including requirements relating to the servicing of the underlying exposures. In the context of NPL securitisations, credit servicers appointed to manage the underlying loan portfolios may therefore be subject to obligations arising under both the CSD and the Securitisation Regulation, depending on the structure of the transaction and the roles performed.

  - **Key areas of potential overlap include the following.** First, the role of the servicer: the Securitisation Regulation requires that an entity be appointed to manage the servicing of the securitised exposures and sets out expectations regarding the servicer's expertise, resources and operational capacity. Where the servicer is also a credit servicer within the meaning of the CSD, it will need to satisfy the authorisation, governance and conduct requirements of the CSD in addition to any servicer-related obligations under the Securitisation Regulation. Second, governance and internal controls: both regimes impose expectations regarding the servicer's governance arrangements, policies and procedures, and risk management frameworks. Firms should ensure that their internal frameworks are designed to meet the requirements of both regimes, avoiding duplication where possible whilst ensuring full compliance with each. Third, outsourcing: both the CSD and the Securitisation Regulation address the outsourcing of servicing functions, albeit with differing levels of prescription. Credit servicers that outsource activities in the context of a securitisation transaction should ensure that their outsourcing arrangements satisfy the CSD's notification and oversight requirements as well as any applicable provisions of the Securitisation Regulation and related technical standards.

- Market participants involved in NPL securitisations should undertake a careful mapping of obligations under both regimes at the structuring stage to ensure that servicing arrangements are appropriately documented and that all applicable regulatory requirements are addressed. Given the complexity of the interaction between the two frameworks, legal and regulatory advice specific to the transaction structure and the jurisdictions involved is typically warranted.

- **Enforcement and sanctions framework.** The CSD establishes a harmonised framework for enforcement and sanctions, whilst leaving Member States discretion to determine the specific penalties applicable within their jurisdictions. The following summarises the key enforcement powers and sanctions available to NCAs under the CSD:

  - **Administrative sanctions and measures:** NCAs are empowered to impose a range of administrative sanctions and measures for breaches of CSD requirements, including: (i) public statements identifying the entity and the nature of the breach; (ii) orders requiring the entity to cease the conduct and desist from repetition; (iii) withdrawal or suspension of authorisation; (iv) temporary bans on members of management bodies or other natural persons held responsible for the breach from exercising functions in credit servicers; and (v) administrative pecuniary sanctions.

  - **Pecuniary sanctions:** The CSD requires Member States to ensure that NCAs can impose administrative fines of at least: (i) for legal persons, up to EUR 5 million or, in Member States whose currency is not the euro, the corresponding value in national currency, or up to 10% of total annual net turnover according to the last available financial statements approved by the management body (with specific rules where the legal person is a parent undertaking or subsidiary); and (ii) for natural persons, up to EUR 5 million or, in Member States whose currency is not the euro, the corresponding value in national currency. Member States may provide for higher maximum fines in their national implementing legislation.

  - **Factors in determining sanctions:** When determining the type and level of administrative sanctions, NCAs are required to take into account all relevant circumstances, including: (i) the gravity and duration of the breach; (ii) the degree of responsibility of the person responsible; (iii) the financial strength of the person responsible; (iv) the profits gained or losses avoided by the person responsible, insofar as they can be determined; (v) the losses caused to third parties by the breach, insofar as they can be determined; (vi) the level of cooperation with the NCA; and (vii) previous breaches by the person responsible.

  - **Publication of sanctions:** NCAs are required to publish on their official website any decision imposing an administrative sanction or measure for breach of CSD requirements, after the person subject to the decision has been notified. The publication must include information on the type and nature of the breach and the identity of the persons responsible. Member States may provide for delayed or anonymous publication in certain circumstances, such as where publication would jeopardise the stability of financial markets or an ongoing investigation.

Credit purchasers: Lighter touch, higher expectations

The key elements of the CSD's framework applicable solely for credit purchasers include:

- **Relationship with borrowers.** Credit purchasers are subject to the same core conduct requirements as credit servicers in their dealings with borrowers, as set out above. In particular, they must act in good faith, treat borrowers fairly, respect their privacy and refrain from misleading or harassing conduct. They must also ensure that borrowers receive the required information in advance of any transfer of the credit agreement and ahead of the first debt collection.

- **Right to information regarding the credit agreement.** Creditors must provide all necessary information to credit servicers before entering a contract to transfer a credit agreement, including the likelihood of recovery of the value of the NPL prior to the sale, the creditor's rights under the NPL agreement and, if applicable, information regarding the collateral.

- **Information on credit servicing.** Credit purchasers must provide the relevant Member State authority with details of the appointed credit servicer.

- **Non-EU credit purchasers.** A non-EU credit purchaser acquiring EU originated NPLs must designate a representative that is established in the EU. The representative will be responsible for the credit purchaser obligations.

- **Transfer of credit agreements.** Credit purchasers must inform the relevant Member State NCA if it transfers a credit agreement to another credit purchaser.

- **Increasing supervisory expectations for credit purchasers.** Although the CSD imposes a lighter regulatory burden on credit purchasers than on credit servicers—most notably, credit purchasers are not subject to authorisation requirements—supervisory expectations have nonetheless increased materially in practice. NCAs across the EU have signalled that credit purchasers cannot treat the absence of a licensing regime as an indication of diminished regulatory interest. In several Member States, thematic reviews and supervisory communications have emphasised that credit purchasers are expected to maintain robust governance arrangements proportionate to the scale, complexity and risk profile of the NPL portfolios they acquire. In particular, NCAs have focused on the following areas:

  - **Governance and internal controls.** Credit purchasers are expected to establish clear internal governance frameworks, including documented policies for the acquisition, management and disposal of NPL portfolios. This includes appropriate board-level oversight of NPL strategy, risk appetite and conduct risk, even where the purchaser itself outsources day-to-day servicing to a third party.

  - **Oversight of credit servicers.** Credit purchasers bear ultimate responsibility for the treatment of borrowers under their acquired portfolios and cannot delegate this responsibility to their appointed credit servicers. NCAs expect credit purchasers to conduct robust due diligence on credit servicers prior to appointment, to include appropriate performance and conduct standards in servicing agreements and to maintain ongoing monitoring of servicer performance. In some jurisdictions, supervisory guidance has specifically addressed the adequacy of contractual provisions, reporting arrangements and escalation procedures between purchasers and servicers.

  - **Non-EU credit purchaser representatives.** Where a non-EU credit purchaser designates an EU-established representative, NCAs have increasingly scrutinised the substance and effectiveness of these arrangements. Representatives must be capable of fulfilling the credit purchaser’s CSD obligations in full, including cooperation with NCAs and the handling of borrower complaints. NCAs have indicated that purely nominal or ‘letterbox’ representative arrangements will not satisfy regulatory expectations and that representatives should have adequate resources, expertise and access to information to discharge their functions effectively.

- **Data handling and protection.** Credit purchasers acquire significant volumes of sensitive personal data as part of NPL transactions and NCAs have emphasised that purchasers must have appropriate data governance frameworks in place. This includes compliance with the GDPR and any additional national data protection requirements, as well as robust arrangements for the secure transfer, storage and processing of borrower data. NCAs have also focused on the adequacy of data protection provisions in sale and purchase agreements and servicing contracts, and on the purchaser's ability to respond to data subject access requests and regulatory enquiries.

Credit purchasers should therefore not assume that the absence of a formal authorisation requirement equates to a lower standard of regulatory oversight. The trend across the EU is towards greater scrutiny of purchaser conduct, governance and accountability—particularly in relation to borrower outcomes and the effectiveness of servicer oversight arrangements.

The amendments to the MCD and the CCD II included:

- **Communication of changes to the credit agreement.** Creditors are required to communicate specific information to a consumer before modifying the terms and conditions of a credit agreement. This information includes a clear and comprehensive description of the proposed changes, a timescale for the implementation of the changes and mechanisms by which the consumer may make a complaint relating to the changes.

- **Reasonable forbearance.** Creditors are required to have adequate policies and procedures so they can exercise, where appropriate, reasonable forbearance before initiating enforcement proceedings. Forbearance refers to the practice of making concessions or temporary arrangements for a borrower in financial difficulty—such as payment deferrals, term extensions or reduced instalments—rather than immediately pursuing enforcement or recovery action.

- **Defences against credit purchasers.** Where there is an assignment to a third party of the creditor's rights under an agreement covered by the MCD or the CCD, the consumer is entitled to plead against the credit purchaser any defence that was available to them against the original creditor. It also creates an obligation for the consumer to be informed about an assignment.

Key strategic implication: Credit purchasers cannot outsource accountability. NCAs expect purchasers to maintain robust governance and active oversight of servicers-regardless of where day-to-day servicing is performed.

Navigating national divergence: Where harmonisation ends

The CSD establishes a common baseline-but not a truly uniform application of this newest credit servicing/purchasing chapter to the EU's Single Rulebook (the unified body of EU financial services legislation applicable across all Member States) for financial services. National divergences in definitions, consumer protections and supervisory practice create material complexity for cross-border operators. Understanding where these divergences bite-and how to manage them-is essential for firms with pan-European ambitions.

The divergences that matter most fall into four categories:

In terms of some common forms of divergences this can be summarised as follows:

- **Definition of Non-Performing Loans (NPLs)**: The CSD provides a general definition of NPLs but allows Member States to refine or supplement this definition in their national transposing legislation. As a result,

some Member States have adopted broader or narrower criteria for what constitutes an NPL, based on local banking practices or supervisory priorities. For example:

  - In some jurisdictions, the threshold for classifying a loan as non-performing may be shorter or longer than the 90 days past due standard or may include additional qualitative indicators of unlikeliness to pay.

  - Certain Member States have chosen to include or exclude specific types of exposures (such as loans to small and medium-sized enterprises (**SME**s), leasing contracts, or certain secured loans) from the scope of the CSD, affecting which transactions and entities fall under the Directive's requirements.

- **Scope of credit servicing activities:** The CSD sets out a list of regulated credit servicing activities, but Member States have discretion to expand or clarify these activities. This has led to:

  - Some countries including ancillary services (such as legal enforcement, restructuring advice, or collateral management) within the definition of credit servicing, while others have limited the scope to core collection and communication functions.

  - Variations in the treatment of debt collection agencies, with some Member States bringing a wider range of debt recovery activities within the CSD's regulatory perimeter and others maintaining separate regimes for traditional debt collectors.

- **Enhanced national consumer protections:** While the CSD sets minimum standards for borrower treatment, information provision and complaints handling, it expressly allows Member States to impose stricter consumer protection measures. This has resulted in:

  - Some Member States requiring more detailed or frequent borrower notifications regarding the transfer of loans, changes in servicer, or the status of the debt.

  - Additional obligations for credit servicers to assess borrower vulnerability, offer forbearance or restructuring options, or provide access to independent debt advice before initiating enforcement proceedings.

  - National rules on the language, format and timing of communications with borrowers, which may go beyond the CSD's requirements.

- **Local complaints and redress mechanisms:** The CSD mandates effective complaints handling, but Member States have discretion to set up or maintain their own dispute resolution bodies or ombudsman schemes. This has led to:

  - Differences in the escalation process for borrower complaints, with some countries requiring mandatory mediation or arbitration before court action.

  - National authorities imposing additional reporting or transparency requirements on credit servicers regarding complaint outcomes and borrower satisfaction.

- **Data protection and privacy:** While the CSD interacts with the GDPR, some Member States have introduced additional data protection safeguards for borrowers in the context of NPL transfers and servicing, such as stricter consent requirements or limitations on data sharing with third parties.

Strategic and operational impact

For firms operating cross-border, these divergences create four distinct challenges:

- **Compliance complexity:** Firms operating cross-border must navigate a patchwork of national rules layered on top of the CSD, requiring careful legal analysis and adaptation of policies and procedures for each jurisdiction.

- **Market fragmentation:** Divergences in definitions and consumer protection standards can affect the attractiveness and liquidity of NPL markets in different Member States, potentially limiting the benefits of the CSD's harmonisation objectives.

Regulatory uncertainty: Ongoing national legislative or regulatory changes, as Member States refine their approaches in response to market developments or supervisory feedback, require firms to maintain robust horizon-scanning and compliance monitoring capabilities.

- **Early supervisory and enforcement trends**: Since the CSD framework became fully operational, NCAs across a number of Member States have begun to identify common areas of supervisory focus. In the area of borrower communications, supervisors have noted instances where credit servicers failed to provide borrowers with timely, accurate or sufficiently clear information regarding the transfer of their loans, the identity of the new servicer or the amounts due—issues that have prompted corrective action in several jurisdictions. Outsourcing arrangements have also attracted scrutiny, with NCAs examining whether credit servicers retain adequate oversight of outsourced functions, maintain appropriate contractual protections and ensure that service providers meet applicable conduct and data protection standards. Additionally, governance weaknesses—including deficiencies in fit and proper assessments, inadequate board-level oversight of servicing activities and gaps in internal control frameworks—have been cited in supervisory findings and, in some cases, have resulted in formal enforcement measures. These early trends suggest that NCAs are prioritising the quality of borrower engagement, the robustness of outsourcing governance and the effectiveness of internal controls as key indicators of CSD compliance, and firms should expect continued supervisory attention in these areas.

The market is consolidating around a clear model: fewer, larger, pan-EU servicers with technology-enabled operations and genuine cross-border capability. Non-EU credit purchasers increasingly rely on EU representatives-creating a new market niche for EU-based service providers. Supervisory reviews and thematic inspections are focusing on governance, borrower treatment, outsourcing and-increasingly-financial crime risk management.

The regulatory trajectory is clear. The Commission's December 2025 review examined borrower protection adequacy, supervisory convergence and passporting effectiveness. Further amendments are anticipated-likely in the direction of tighter standards, not relaxation. Firms should plan for continued regulatory evolution, not a stable endpoint.

Key strategic implication: National divergences are a feature, not a bug. Firms must build compliance frameworks capable of managing jurisdiction-specific requirements—or accept the cost of limiting their geographic footprint.

National implementation: Material divergences at a glance

The following summaries highlight the most strategically and operationally material divergences across key EU markets. Full country-by-country analysis is available from PwC Legal's EU RegCORE team.

Austria

In Austria, the CSD was transposed through the enactment of the Federal Act on Credit Servicers and Credit Purchasers (Kreditdienstleister- und Kreditkäufergesetz, **KKG**), published in BGBl. I Nr. 6/2025 on 17 March 2025. This Act introduced amendments to the Banking Act (Bankwesengesetz, BWG), the Financial Market Authority Act (Finanzmarktaufsichtsbehördengesetz, FMABG), the Mortgage and Real Estate Credit Act (Hypothekar- und Immobilienkreditgesetz, HIKrG) and the Consumer Credit Act (Verbraucherkreditgesetz, **VKrG**). The KKG delineates the definitions of credit servicers and credit purchasers in accordance with the CSD and prescribes the requisite standards and duties for both categories of entities. The Austrian Financial Market Authority (**FMA**) serves as the NCA responsible for the authorisation and oversight of credit servicers, as well as for the notification and registration of credit purchasers. The notification process requires submission of an application form and supporting documentation regarding the legal structure, ownership, management and principal commercial activities of the credit purchaser. The FMA levies charges for notification and registration, as set out in the FMA's Fee Ordinance (FMA-GebV). Austria stands out for stringent requirements on borrower communication and fit-and-proper standards.

Austria's implementation of the CSD is notable for its comprehensive integration with existing financial sector legislation, particularly the BWG and VKrG. The KKG provides for a robust notification and registration regime for credit purchasers, even though they are not subject to full authorisation. The KKG reinforces consumer protection by requiring credit servicers and purchasers to provide borrowers with advance notice of NPL sales, clear information on the identity and authorisation of the new servicer and details of the amounts due. Borrowers have the right to lodge complaints with the FMA, which is empowered to investigate and impose administrative sanctions or remedial measures for breaches of the law.

The FMA's public register and transparent supervisory approach are designed to enhance market confidence and facilitate cross-border activity. Austria has not introduced significant gold-plating or additional requirements beyond the CSD's minimum standards but maintains strong consumer protection and data privacy rules in line with national practice. As of 2025, the FMA has issued several public enforcement actions for inadequate borrower treatment and poor outsourcing oversight.

Belgium

Belgium implemented the CSD through the Law transposing Directive (EU) 2021/2167 on credit servicers and credit purchasers (Loi transposant la directive (UE) 2021/2167 du Parlement européen et du Conseil du 24 novembre 2021 sur les gestionnaires de crédits et les acheteurs de crédits), published in the Moniteur Belge on 14 January 2025. This Law amended the Code of Economic Law (Code de droit économique, **CDE**) and the Directives 2008/48/EC and 2014/17/EU. The law entered into force following the CSD's transposition deadline, establishing a comprehensive legal framework for the regulation of credit servicers and credit purchasers in Belgium. This law introduced a new category of regulated entities—credit servicers and credit purchasers—subject to specific authorisation, conduct and reporting requirements.

Belgium's implementation of the CSD introduces several jurisdiction-specific features that go beyond the harmonised EU baseline. Notably, the Belgian regime places a strong emphasis on the qualifications, training and ongoing supervision of staff involved in credit servicing and purchasing. Credit servicers and purchasers must ensure that their personnel possess the necessary expertise and receive regular training, reflecting Belgium's commitment to professionalising the sector and safeguarding borrower interests.

Under the Belgian regime, credit servicers must obtain authorisation from the designated NCA which is the Financial Services and Markets Authority (**FSMA**). In addition to maintaining a public register of authorised credit servicers, the FSMA requires both credit servicers and purchasers to promptly notify it of any significant changes in their legal status, shareholding structure, management, or business activities that could affect their regulatory standing. This notification obligation is more detailed than the minimum CSD requirements and is designed to ensure ongoing transparency and regulatory oversight.

Belgium also mandates that credit servicers and purchasers establish comprehensive internal control and risk management systems, as well as contingency plans and business continuity arrangements. These requirements are enforced through regular reporting to the FSMA on operational resilience and compliance with Belgian law. Furthermore, the FSMA has the authority to impose a wide range of administrative sanctions, including fines and the suspension or withdrawal of authorisation, in cases of non-compliance.

Consumer protection is further reinforced under Belgian law. Credit servicers and purchasers must comply not only with the CSD's borrower information and fair treatment standards but also with Belgium's stringent consumer protection and data privacy rules. The FSMA closely monitors complaints handling and may require firms to implement additional measures to address systemic issues or recurring borrower grievances. This approach ensures that Belgian borrowers benefit from a high level of protection and that market participants are held to rigorous standards of conduct and transparency.

Bulgaria

In Bulgaria, the CSD was transposed by the Law on Credit Servicers and Credit Purchasers (**LCSCP**), which amended the Credit Institutions Act, the Consumer Credit Act and the Law on Consumer Real Estate Credit. The LCSCP applies to credit agreements concluded with consumers, micro, small and medium-sized enterprises and other non-financial corporations, as well as to credit agreements secured by mortgages or other comparable securities on residential immovable property.

The LCSCP requires credit servicers to obtain a licence from the Bulgarian National Bank (**BNB**) as the NCA, unless they are already authorised as credit institutions, payment institutions, electronic money institutions, or insurance undertakings in Bulgaria or another EU Member State. The LCSCP sets out the conditions and procedures for the licensing, conduct and supervision of credit servicers, as well as the rights and obligations of credit purchasers, credit institutions and borrowers.

The LCSCP provides for the possibility of outsourcing credit servicing activities to third parties, subject to certain requirements and limitations. The LCSCP imposes information and notification duties on credit servicers, credit purchasers and credit institutions, in line with the CSD. Credit servicers and credit purchasers must comply with the core conduct requirements set out above (fair treatment, transparency, prohibition on misleading or harassing conduct) and the LCSCP grants the BNB the power to impose administrative sanctions and measures for breaches, ranging from warnings and fines to withdrawal of licences and prohibition of activities.

Consumer protection is a key focus of the Bulgarian regime. In addition to the CSD's core conduct requirements (as summarised above), the LCSCP includes explicit obligations to provide borrowers with clear and timely information regarding the transfer of credit agreements, the identity and contact details of the new credit servicer or purchaser and the amounts due. The BNB has the authority to impose a range of administrative sanctions for breaches, including warnings, fines, suspension or withdrawal of licences and prohibition of activities. Borrowers also have the right to lodge complaints with the BNB or to seek judicial redress if their rights or interests are violated.

Finally, the Bulgarian framework places a strong emphasis on transparency and regulatory cooperation. Credit servicers and purchasers are required to cooperate fully with the BNB and other relevant authorities and the BNB maintains a public register of licensed credit servicers. The LCSCP's approach to supervision, outsourcing and consumer protection reflects Bulgaria's commitment to ensuring a robust, transparent and borrower-focused credit servicing market.

Croatia

Croatia implemented the CSD by adopting the Law on the Methods, Conditions and Procedure for Credit Servicing and Credit Purchasing (Zakon o načinu, uvjetima i postupku servisiranja i kupoprodaje potraživanja),

published in Narodne Novine No. 155/23 on 22 December 2023. The law was supplemented by amendments to the Housing Consumer Credit Act (Zakon o stambenom potrošačkom kreditiranju) and the Consumer Credit Act (Zakon o potrošačkom kreditiranju), both published in Narodne Novine No. 156/23. The law applies to credit servicers and credit purchasers operating in Croatia, as well as to creditors and borrowers involved in NPL transactions.

The ZODUK also defines credit servicing activities in line with the CSD, as the administration and enforcement of credit agreements, including the collection of information, the management of payments, the monitoring of compliance, the restructuring and refinancing of loans, the recovery of amounts due and the realisation of collateral.

The Croatian NCA for authorising and supervising credit servicers is the Croatian Financial Services Supervisory Agency (Hrvatska agencija za nadzor financijskih usluga, **HANFA**). Credit servicers must obtain an authorisation from HANFA before carrying out credit servicing activities in Croatia, unless they are already authorised in another Member State and have notified HANFA of their intention to provide cross-border services.

To obtain an authorisation, credit servicers must meet certain requirements, such as having a registered office and a management board in Croatia, having sufficient capital and liquidity, having adequate internal policies and procedures, having fit and proper managers and staff and having professional indemnity insurance. Credit servicers must also comply with the CSD's core conduct requirements (as summarised above) and cooperate with HANFA.

Credit purchasers must inform HANFA of the acquisition of NPLs originated in Croatia within 15 days of the transfer of the creditor's rights and provide details of the appointed credit servicer or the designated representative, if applicable. Credit purchasers must also inform HANFA of any subsequent transfer of NPLs to another credit purchaser within the same deadline.

The ZODUK defines credit servicing activities in line with the CSD but also clarifies that these include the administration and enforcement of credit agreements, collection of information, management of payments, monitoring of compliance, restructuring and refinancing of loans, recovery of amounts due and realisation of collateral. The law allows for the outsourcing of credit servicing activities to third parties, but only under strict conditions and with HANFA’s prior approval, ensuring that the credit servicer remains fully responsible for compliance.

Consumer protection is a central focus of the Croatian regime. Credit servicers and purchasers must comply with the CSD's core conduct requirements (as summarised above). Borrowers have the right to lodge complaints with HANFA or seek judicial redress if their rights or interests are violated. HANFA is empowered to impose a range of sanctions and remedies for breaches, including fines, suspension or withdrawal of authorisation, injunctions, or restitution orders.

Cyprus

The CSD was transposed in Cyprus through multiple legislative instruments, including the Law on Credit Servicers and Credit Purchasers and Related Matters, published in the Cyprus Gazette No. 5012 on 8 November 2024. This was accompanied by amendments to the Consumer Credit Law, the Law on Credit Agreements for Consumers relating to Residential Immovable Property, the Law on Interest Rate Liberalisation and the Law on the Purchase and Sale of Credit Facilities. The law introduced a new licensing regime for credit servicers and credit purchasers, as well as amendments to the existing legal framework on the transfer and enforcement of credit agreements and collateral.

The NCA for the authorisation and supervision of credit servicers and credit purchasers in Cyprus is the Central Bank of Cyprus (**CBC**). The CBC has the power to impose administrative sanctions and corrective

measures for breaches of the law and the relevant directives. The CBC has also issued a directive on the conduct of business obligations of credit servicers and credit purchasers, which sets out detailed rules on the information, communication and treatment of borrowers, as well as the outsourcing, reporting and record-keeping requirements.

The law defines credit servicing as the management or administration of credit agreements, including the collection and recovery of payments, the restructuring or refinancing of credit agreements, the management of collateral and the communication with borrowers. Credit purchasing is defined as the acquisition of the creditor's rights under a credit agreement, regardless of whether the credit agreement is secured or unsecured, performing or non-performing.

Credit servicers and credit purchasers are required to obtain a licence from the CBC before commencing their activities, unless they fall within certain exemptions, such as credit institutions, insurance companies, investment firms, or securitisation special purpose entities. The licence is valid for the entire EU, subject to the notification and cooperation procedures between the CBC and the host Member States.

The law sets out the conditions and criteria for the granting and revocation of the licence, as well as the obligations and responsibilities of the licence holders. The licence holders are subject to minimum capital requirements, fit and proper requirements, organisational and governance requirements and prudential supervision by the CBC. The minimum capital requirement for credit servicers is EUR 200,000 and for credit purchasers is EUR 500,000.

The law also regulates the transfer of credit agreements and collateral from the original creditor to the credit purchaser, as well as the enforcement of collateral by the credit purchaser or the credit servicer acting on its behalf. The law provides for the possibility of transferring the credit agreement and the collateral by means of a single notification to the borrower and the NCA, without the need for a court order or a notarial deed. The law also simplifies the procedures for the enforcement of collateral, such as mortgages, pledges, or guarantees, by allowing the credit purchaser or the credit servicer to initiate the enforcement without the consent of the borrower or the guarantor, subject to certain conditions and safeguards.

The law and the directive impose specific conduct of business obligations on credit servicers and credit purchasers in respect of borrowers, in line with the CSD's core conduct requirements (as summarised above). These obligations include the duty to act in good faith, treat borrowers fairly, avoid misleading or harassing conduct, provide clear information on any transfer of the credit agreement and offer reasonable and sustainable solutions to borrowers in financial difficulties. Servicers and purchasers must also respect borrower privacy and maintain records of all correspondence and transactions.

Czech Republic

In the Czech Republic, the CSD was implemented primarily through the Act on the Non-Performing Loans Market (Zákon o trhu s nevýkonnými úvěry, No. 84/2024) and the accompanying Act amending certain laws in connection with the adoption of the Act on the Non-Performing Loans Market (Zákon kterým se mění některé zákony v souvislosti s přijetím zákona o trhu s nevýkonnými úvěry, No. 85/2024), both published on 11 April 2024. These Acts introduced a licensing regime for credit servicers and credit purchasers, as well as a notification procedure for cross-border activities, and amended existing legislation including the Banks Act, the Consumer Credit Act and the Czech National Bank Act.

The Czech National Bank (**CNB**) is the NCA for supervising and enforcing the credit servicers in the Czech Republic, as well as for maintaining a public register of authorised credit servicers and credit purchasers. The Czech approach on CSD does not involve significant gold-plating but does reinforce existing national standards for consumer protection, data privacy and financial sector integrity. The integration of the CSD into the broader Czech legal framework ensures that credit servicers and purchasers operating in the Czech

Republic are subject to clear, robust and transparent regulatory expectations, with a strong emphasis on borrower rights and regulatory oversight.

Denmark

Denmark transposed the CSD into national law primarily through the Act on Credit Servicing Companies and Credit Purchasers (Lov om kreditservicevirksomheder og kreditkøbere), published in Lovtidende A on 13 December 2023, together with amendments to the Danish Financial Business Act (Lov om finansiel virksomhed) and related executive orders, with the new rules taking effect by the end of 2023. In implementing the CSD, Denmark made several jurisdiction-specific choices that go beyond the minimum EU requirements. First, regarding the scope of application, Denmark has excluded loans secured by residential real estate, as permitted by the Directive, but has also clarified that certain small business loans and loans to public authorities fall outside the scope. This reflects the structure and needs of the Danish credit market.

For authorisation and supervision, Denmark designated the Danish Financial Supervisory Authority (**Finanstilsynet**) as the NCA. As a matter of supervisory practice, Finanstilsynet has indicated an expectation that credit servicers maintain a physical presence within the country, a step beyond the CSD's baseline. This measure is intended to facilitate effective supervision and ensure robust consumer protection.

Danish implementation also places a strong emphasis on consumer protection. In addition to the Directive's basic conduct of business rules, Denmark has adopted further measures applicable to credit servicers, particularly in their dealings with vulnerable debtors. These typically include mandatory information disclosures, specific procedures for handling complaints and an expectation that all communications with debtors be in Danish and presented in a clear, comprehensible manner.

The fit and proper requirements for management of credit servicers have also been given particular attention in Denmark. Beyond the Directive's general standards, Danish supervisory practice emphasises that managers should possess local knowledge of Danish insolvency and enforcement procedures, with the aim of ensuring that credit servicers are well-equipped to operate within the national legal context.

Data protection and IT security are areas where Denmark has adopted a heightened supervisory focus relative to the Directive's baseline. Credit servicers are generally expected to comply with enhanced IT security standards and are subject to reporting obligations regarding data breaches to the Finanstilsynet, in addition to their obligations under the GDPR. This reflects Denmark's broader commitment to high standards in data protection.

While the CSD does not regulate the fees charged by credit servicers, Denmark has introduced certain caps on fees that can be imposed on debtors. These measures are intended to discourage potentially abusive practices and to further protect consumers.

Finally, Denmark had provided a transitional period for existing credit servicers to obtain the necessary authorisation under the new regime. However, the Danish transitional period is shorter than the maximum allowed under the CSD, reflecting a desire for a swift and orderly transition. In summary, Denmark's implementation of the CSD is characterised by a cautious and consumer-focused approach, with several jurisdiction-specific requirements that exceed the EU minimum standards.

Estonia

Estonia implemented the CSD through the Act on Credit Servicers and Credit Purchasers (Krediidiinkassode ja -ostjate seadus), published in Riigi Teataja on 4 July 2024, together with amendments to the Creditors and Credit Intermediaries Act (Krediidiandjate ja -vahendajate seadus), the Credit Institutions Act (Krediidiasutuste seadus) and the Financial Supervision Authority Act (Finantsinspektsiooni seadus). Estonia has exercised its discretion in several areas to tailor the CSD's regime to local market conditions and regulatory priorities.

In terms of scope, Estonia has closely followed the CSD's exclusions, such as loans secured by residential real estate, but has also clarified that certain microloans and loans issued by public sector entities are not subject to the new regime. This reflects the relatively small size and specific structure of the Estonian credit market, where such loans are less likely to be traded or serviced by third parties.

For the authorisation and supervision of credit servicers, Estonia has designated the Estonian Financial Supervision Authority (**Finantsinspektsioon**) as the NCA. In addition to the CSD's requirements, Estonian supervisory practice has placed emphasis on stricter fit and proper criteria for management board members of credit servicers, including expectations regarding local language proficiency and a demonstrable understanding of Estonian financial regulation. The Estonian regime also expects that at least one management board member be resident in Estonia, a measure aimed at ensuring effective local oversight and accountability.

While the CSD provides a baseline for consumer protection, Estonia has adopted additional safeguards. For example, it is generally expected that credit servicers provide all communications to consumers in Estonian, regardless of the consumer's nationality or language preference. Furthermore, Estonia has extended the scope of the Directive's conduct of business rules to cover not only non-performing loans (NPLs) but also certain categories of performing loans, particularly where the debtor is a consumer or a micro-enterprise. This extension reflects Estonia's policy objective of ensuring a high level of consumer protection in the credit market.

Estonia has supplemented the Directive's data protection provisions by adopting a supervisory expectation that credit servicers maintain their data processing and storage infrastructure within the European Economic Area—the EU Member States plus Iceland, Liechtenstein and Norway—unless an exemption is granted by the Data Protection Inspectorate. This approach is intended to facilitate regulatory oversight and enhance the security of sensitive financial data, though the specific application may depend on the circumstances of individual firms.

Estonia adopted a relatively short transitional period for existing credit servicers to obtain authorisation under the new regime, setting a six-month window from the date of entry into force of the national implementing legislation. Unlike some other Member States, Estonia did not provide for broad grandfathering (the practice of allowing existing operators to continue their activities under pre-existing rules for a transitional period) of existing operators, instead requiring all entities to undergo a full authorisation process, regardless of prior activity. This approach was justified by the authorities as necessary to ensure a level playing field and consistent application of the new standards.

Estonian law provides for a wider range of administrative sanctions for breaches of the credit servicers regime than those strictly required by the CSD. In addition to fines, the Finantsinspektsioon is empowered to impose temporary bans on business activities and to publish the names of sanctioned entities. These measures are intended to enhance deterrence and promote transparency in the credit servicing market.

Finland

Finland transposed the CSD into national law primarily through the Act on Credit Purchasers and Credit Servicers (Laki luotonostajista ja luotonhallinnoijista, No. 161/2025), published on 25 April 2025, together with amendments to the Act on Credit Institutions (610/2014), the Financial Supervision Act (Laki Finanssivalvonnasta), the Consumer Protection Act (Kuluttajansuojalaki) and related legislation. The Finnish approach to implementation was characterised by a focus on robust consumer protection and the integration of the new regime with existing national frameworks for financial supervision and debt collection.

While the CSD requires credit servicers to be authorised, Finland has extended the licensing requirement to cover not only entities servicing NPLs originated by credit institutions but also those servicing loans originated by other financial undertakings. This broader scope reflects Finland's traditionally cautious approach to consumer credit and debt collection activities. The Finnish Financial Supervisory Authority (**FIN-FSA**) was designated as the NCA for licensing and supervision and the licensing process includes a fit and proper assessment of management and owners, as well as expectations regarding internal controls and risk management that may, in practice, exceed the minimum EU standards.

The Finnish implementation introduced additional consumer protection measures, particularly regarding the conduct of credit servicers. For example, the national law includes detailed requirements for the provision of information to borrowers, including disclosures about the identity of the credit servicer and the purchaser, as well as the terms of the loan and the borrower's rights. Furthermore, Finland has maintained its existing, more developed rules on debt collection practices, which apply in parallel to credit servicers. This typically includes prohibitions on aggressive collection tactics and expectations for fair treatment of borrowers, which may exceed the CSD's baseline in practice.

Finland imposed enhanced supervisory and reporting obligations on credit servicers. In addition to the Directive's requirements, Finnish law mandates regular reporting to the FIN-FSA on the volume and nature of serviced loans, complaints received and compliance with consumer protection rules. The FIN-FSA is also empowered to conduct on-site inspections and impose administrative sanctions for breaches, reflecting Finland's proactive supervisory culture.

France

France has opted to integrate the CSD regime within its existing framework for financial intermediaries. Transposition was achieved through Law No. 2023-171 of 9 March 2023 on various provisions adapting to EU law, Ordinance No. 2023-1139 of 6 December 2023 on credit servicers and credit purchasers, and Decree No. 2023-1211 of 20 December 2023. The French implementation requires credit servicers to obtain authorisation from the Autorité de Contrôle Prudentiel et de Résolution (**ACPR**), the national banking and insurance supervisor. The French regime is understood to go beyond the Directive by imposing additional fit and proper requirements for managers and significant shareholders, reflecting France's traditionally rigorous approach to financial sector governance. Furthermore, the ACPR has been granted broad supervisory powers, including the ability to conduct on-site inspections and request detailed information from credit servicers.

France has made use of the CSD discretion by extending the application of its robust consumer credit laws to credit servicers, even where the Directive would not strictly require it. For example, French law generally expects credit servicers to comply with the Code de la Consommation's provisions on debt collection practices, including requirements for transparency, fair treatment and the prohibition of abusive practices. This is intended to ensure that borrowers benefit from a consistent level of protection regardless of whether their loan is managed by the original creditor, a credit servicer or a credit purchaser.

While the CSD addresses data protection in general terms, France has reinforced these obligations by explicitly referencing the application of GDPR and the French Data Protection Act (Loi Informatique et Libertés). French supervisory practice generally expects credit servicers to appoint a data protection officer and to conduct data protection impact assessments where appropriate, particularly given the sensitive nature of financial data involved in NPL servicing.

The French implementation introduces additional reporting obligations for credit servicers, typically requiring regular submission of activity reports to the ACPR. These reports are expected to include detailed information on the volume and nature of NPLs managed, recovery rates and any complaints received. This approach may go beyond the minimum requirements of the CSD and is intended to enhance supervisory oversight and market transparency.

Germany

In Germany, the CSD was implemented by the Act on the Promotion of Orderly Secondary Credit Markets and the Implementation of Directive (EU) 2021/2167 on Credit Servicers and Credit Purchasers (Gesetz zur Förderung geordneter Kreditzweitmärkte und zur Umsetzung der Richtlinie (EU) 2021/2167 über Kreditdienstleister und Kreditkäufer, the **Kreditzweitmarktförderungsgesetz** or **KrZwMG**), published on 29 December 2023. The KrZwMG designates Germany's Federal Financial Supervisory Authority (**BaFin**) as the NCA for authorising and supervising credit servicers and receiving notifications from credit purchasers. The KrZwMG also establishes a national register of authorised credit servicers, which is maintained by BaFin and accessible to the public online.

The KrZwMG largely follows the provisions of the CSD, but also specifies the requirements and procedures for obtaining authorisation as a credit servicer or the KrZwMG introduced term "Credit Servicer Institutions" which are firms carrying out credit servicing activities for and on behalf of a credit purchaser, notifying BaFin of cross-border activities, appointing a representative and transferring creditor's rights or credit agreements. The KrZwMG also sets out the penalties and remedial measures that BaFin can impose on credit servicers and credit purchasers for breaches of the obligations under the CSD and the KrZwMG, as well as the procedure for handling complaints by borrowers.

Germany's Legal Services Act (Rechtsdienstleistungsgesetzes – **RDG**) governs debt collection services in Germany since they are considered to be a legal service and are thus subject to certain regulations. In the future, debt collection agencies that have been subject to the RDG up to this point but seek to offer relevant credit services that are included in the scope of the CSD will be required to be licenced under and supervised in accordance with the KrZwMG. Germany does not provide for automatic recognition of entities carrying out servicing conceptually equivalent to the CSD. Such operations will continue to be subject to the RDG in the event that such companies provide services in regard to receivable portfolios that do not meet the criteria for being considered NPLs and in scope of CSD. The KrZwMG delegates to the BaFin the obligation of monitoring compliance with the RDG in this particular instance. In close collaboration with the Federal Office for Justice (Bundesamt für Justiz), the BaFin is responsible for carrying out such a supervisory obligation. Debt collection firms, on the other hand, that do not offer credit services will be completely excluded from the purview of the CSD and the KrZwMG.

Furthermore, in Germany financial intermediaries play a crucial role in the credit market by facilitating transactions between banks and borrowers. In Germany, credit intermediaries must obtain a licence under Sec. 34c of the Trade, Commerce and Industry Regulation Act (Gewerbeordnung – **GewO**). The BaFin does not currently have jurisdiction over these cases. Providers who assist banks and/or credit purchasers in negotiating with borrowers will still be regulated under the GewO.

As with other regulated firms in Germany, Credit Servicer Institutions must fulfil three requirements: (i) submitting their annual account to BaFin, (ii) hiring an appropriate external auditor for the annual audit and (iii) informing BaFin about the auditor's appointment. In some circumstances, the BaFin has the authority to demand the selection of an alternative external auditor. The external audit must adhere to specific audit rules and the final report must be submitted to BaFin.

The BaFin has published guidance on the implementation of the CSD and the KrZwMG, providing further details and clarifications on the application of the new framework. The guidance covers topics such as the definition and scope of credit servicing activities, the authorisation process and conditions, the notification and reporting obligations, the conduct rules and consumer protection standards, the cross-border activities and cooperation with other NCAs and the enforcement and sanctioning powers of the BaFin.

Greece

Greece has transposed the CSD into its national law through Law No. 5072/2023 on Loans: Transparency, Competition, Protection of the Vulnerable – Transposition of Directive (EU) 2021/2167, Reintroduction of the HERCULES Programme and Other Urgent Provisions, published in the Government Gazette No. 198 on 4 December 2023. The Greek NCA for credit servicers and credit purchasers is the Bank of Greece, which maintains a public register of authorised entities on its website.

Credit servicers and credit purchasers that wish to operate in Greece must obtain a licence from the Bank of Greece, unless they are already authorised in another Member State and have notified the Bank of Greece of their intention to provide cross-border services. The licence application must include information on the legal form, ownership, management, business plan, internal control systems and outsourcing arrangements of the applicant, as well as a declaration of compliance with the CSD and the Greek law. The Bank of Greece may impose additional conditions or requirements on the licence, such as minimum capital, fit and proper criteria, or specific reporting obligations.

Credit servicers and credit purchasers must comply with the CSD's core conduct requirements (as summarised above), including fair treatment, transparency, prohibition on misleading or harassing practices and provision of specific information on NPL transfers. They must also comply with Greek consumer protection and data protection laws, as well as the Code of Conduct for the Management of NPLs, which sets out principles and best practices for the restructuring and resolution of NPLs.

Credit servicers and credit purchasers must keep records of their activities and transactions for at least 10 years and provide them to the Bank of Greece upon request. This 10-year period reflects the CSD minimum; Greek national law or other applicable regulatory requirements (including AML/CTF obligations) may mandate longer retention in certain circumstances. They must also report to the Bank of Greece on a regular basis, at least annually, on their financial situation, performance, risk management and compliance with the CSD and the Greek law. The Bank of Greece has the power to supervise, inspect and sanction credit servicers and credit purchasers for any breaches of their obligations and may revoke or suspend their licence in case of serious or repeated violations.

The Greek government and the Bank of Greece have implemented several measures to facilitate the reduction of NPLs, such as the establishment of the “Hercules” asset protection scheme (Hellenic Asset Protection Scheme)—a state-backed guarantee programme modelled on the Italian GACS—the reform of the insolvency and foreclosure frameworks and the promotion of out-of-court workouts and securitisations.

The debt collection sector in Greece is highly fragmented and competitive, with a large number of small and medium-sized enterprises, as well as some international players, offering various services, such as amicable settlement, legal action and debt purchase. The CSD is expected to create a more harmonised and transparent regulatory environment for the sector and to attract more foreign investors and servicers to the Greek NPL market. However, the sector also faces some longstanding challenges, such as the low recovery rates, the high legal costs and delays, the social stigma and resistance of borrowers and the impact of the COVID-19 pandemic on the economy and the loan performance.

Hungary

Hungary has implemented the CSD through the Act on Credit Servicers for Non-Performing Credit Agreements and Credit Purchasers of Non-Performing Credit Agreements (Act XII of 2025, 2025. évi XII. törvény a nemteljesítő hitelmegllapodások hitelgondozóiról és a nemteljesítő hitelmegállapodások felvásárlóiról), together with related government decrees on complaints handling and fit and proper requirements. The Act applies to credit servicers and credit service providers that provide credit servicing activities in Hungary, as well as to credit
purchasers that acquire NPLs from Hungarian creditors.

The National Bank of Hungary (**NBH**) is the NCA for the authorisation and supervision of credit servicers and credit service providers, as well as for the registration of credit purchasers. Credit servicers and credit service providers must obtain an authorisation from the NBH before commencing their activities and must comply with the prudential, organisational and conduct of business requirements set out in the NBH Decree. Credit purchasers must register with the NBH within 15 days of acquiring NPLs from Hungarian creditors and must provide information on the NPLs, the credit servicers or credit service providers involved and the borrowers.

The NBH Decree follows the CSD's framework for the relationship with borrowers, incorporating the core conduct requirements summarised above, with some national specificities. Notably, the NBH Decree allows credit servicers and credit purchasers to provide required information electronically, unless the borrower requests a paper-based communication. The NBH Decree also grants borrowers the right to request a copy of the contract transferring the creditor's rights and to challenge the validity or enforceability of the transfer before a court.

Ireland

The CSD was transposed into Irish law by the European Union (Credit Servicers and Credit Purchasers) Regulations 2023 (S.I. No. 664 of 2023), published in Iris Oifigiúl No. 103 on 26 December 2023 (the **Regulations**). The Regulations designate the Central Bank of Ireland (**CBI**) as the NCA for the authorisation and supervision of credit servicers and credit purchasers in Ireland.

Credit servicers and credit purchasers that wish to provide credit servicing activities in Ireland must either obtain an authorisation from the CBI or notify the CBI of their intention to passport their services from another Member State, in accordance with the CSD. The CBI maintains a public register of authorised and passported credit servicers and credit purchasers on its website.

Credit servicers and credit purchasers are subject to the CSD's core conduct requirements (as summarised above), including fair treatment, transparency, prohibition on misleading or harassing conduct and provision of specific information ahead of first debt collection. The information must include the date of transfer, identification, contact details and authorisation of the new credit servicer or credit service provider, as well as detailed information on the amounts due by the borrower.

Credit servicers and credit purchasers must also comply with the statutory Code of Conduct on the Transfer of Mortgages, which applies to regulated entities that transfer mortgages to unregulated entities, such as credit purchasers. The Code requires the transferor to inform the borrower of the transfer and the identity and contact details of the transferee and to ensure that the borrower's rights and obligations under the mortgage contract are not adversely affected by the transfer. The Code also requires the transferee to adhere to the Code of Conduct on Mortgage Arrears and the Consumer Protection Code, which set out the standards of conduct and communication for dealing with borrowers in financial difficulties.

The CBI has also issued guidance on the application of the CSD to Irish entities and activities, as well as a set of FAQs on the CSD. The guidance clarifies, for example, that the CSD applies to credit agreements that are secured or unsecured, performing or non-performing and consumer or non-consumer, as long as they are not excluded by the CSD or the Irish regulations. The guidance also explains the scope of the credit servicing and credit purchasing activities that require authorisation or notification under the CSD and the exemptions and grandfathering provisions that may apply. The FAQs address some practical issues, such as the application process, the fees, the passporting rights and the reporting obligations for credit servicers and credit purchasers.

The CSD does not apply to all types of debt collection agencies, unless they carry out a CSD activity, such as enforcing a credit agreement or managing a credit agreement on behalf of a creditor. However, debt collection agencies that are not subject to the CSD may still be subject to other relevant laws and regulations in Ireland, such as the Consumer Credit Act 1995, the Data Protection Act 2018 and the Central Bank Act 1997, each as amended and supplemented.

Italy

Italy already had a comprehensive legal framework for credit servicing and credit purchasing, which is largely consistent with the CSD, but required adjustments to align with the CSD's provisions. The CSD was transposed through Legislative Decree No. 116 of 30 July 2024 (Decreto legislativo 30 luglio 2024, n° 116 di recepimento della direttiva 2021/2167), published in the Gazzetta Ufficiale No. 189 on 13 August 2024, together with the Bank of Italy's implementing provisions published in the Gazzetta Ufficiale on 7 March 2025. The national regime regulates the activities of credit servicers and credit purchasers, as well as the transfer of credit agreements, in line with the EU Directive. The Bank of Italy supervises the register of credit servicers and credit purchasers and sets out the requirements and obligations for the authorisation, conduct and reporting of these entities.

The Italian NPL market has been supported by several policy measures in recent years, aimed at reducing the high stock of NPLs and enhancing the efficiency and transparency of the secondary market. One of the most significant measures is the GACS (Garanzia Cartolarizzazione Sofferenze) scheme, a state-backed guarantee mechanism that provides a state guarantee on the senior tranche of securitised NPLs, subject to certain conditions and fees. The GACS scheme has been extended multiple times since its introduction in 2016 and remains an important tool in the Italian NPL market. Another important measure is the reform of the insolvency and enforcement procedures, which simplifies and accelerates the recovery of NPLs, especially those secured by real estate, by introducing new tools and mechanisms, such as the out-of-court enforcement, the electronic auction and the assignment of claims to creditors.

The NPL market in Italy faces several challenges and opportunities in the current and future scenario. On the one hand, macroeconomic uncertainty and the risk of deterioration in asset quality and profitability of the banking sector continue to affect both the demand and supply of NPLs. On the other hand, the public sector has played and will continue to play a key role in supporting the NPL market, through the GACS scheme, the provision of moratoria and guarantees for loans and the national asset management company (AMCO) to manage and dispose of NPLs. Moreover, the availability of data and information on NPLs has improved, thanks to the harmonisation of the reporting standards and the development of data platforms and databases. Finally, the competition and innovation among credit servicers and credit purchasers have increased, as a result of the entry of new players, the consolidation of existing ones and the adoption of new technologies and solutions.

Latvia

The legal framework for NPLs in Latvia is governed by the CSD transposition legislation including the Debt Recovery Service Providers Licensing Regulations (Ministru kabineta 2024.gada 16.jūlija noteikumi Nr.485 Parāda atgūšanas pakalpojuma sniedzēju licencēšanas kārtība), published on 18 July 2024, together with amendments to the Law on Credit Institutions, the Law on Consumer Rights Protection, the Law on Out-of-Court Debt Recovery (Parādu ārpustiesas atgūšanas likums), and the Bank of Latvia's Credit Register Regulations. The comprehensive framework also includes the Civil Procedure Law and the Insolvency Law. The Law on Credit Institutions was amended to implement the CSD, introducing a licensing regime for credit servicers and credit purchasers, as well as specific obligations and requirements for them in relation to NPLs. Credit servicers and credit purchasers must be authorised by the Financial and Capital Market Commission (**FCMC**) as the NCA and must comply with certain prudential, organisational and conduct of business rules. They must also report regularly to the FCMC on their activities and the NPLs they service or purchase.

The Law on Consumer Rights Protection was amended in 2019 to enhance the protection of borrowers, especially consumers, in case of NPL transfers. In addition to the CSD's core conduct requirements (as summarised above), the Latvian framework expects credit servicers and credit purchasers to take into account the borrower's financial situation and personal circumstances when negotiating repayment plans or offering settlements. Borrowers must also be informed of available dispute resolution mechanisms.

The Civil Procedure Law and the Insolvency Law provide the legal basis and the procedures for enforcing NPLs, either through judicial or extrajudicial means, depending on the type and the value of the NPL, the existence and the nature of the collateral and the consent of the parties. The Civil Procedure Law regulates the general rules for civil litigation, including the jurisdiction, the competence, the evidence, the costs and the remedies of the courts. It also sets out the specific procedures for obtaining and enforcing judgments, orders and writs of execution, as well as for applying interim measures, such as freezing orders or injunctions. The Insolvency Law regulates the insolvency proceedings of natural and legal persons, including the conditions, the stages, the effects and the outcomes of the proceedings. It also defines the rights and obligations of the creditors, the debtors, the insolvency administrators and the courts in the insolvency process.

The Law on Out-of-Court Recovery of Collateral regulates the conditions and the process for the creditor or the credit purchaser to recover the collateral without resorting to court proceedings, subject to the agreement of the borrower and the compliance with certain formalities and safeguards. It applies to movable and immovable property that is pledged as collateral for a loan or a credit agreement and that is registered in the relevant public registers. It requires the creditor or the credit purchaser to notify the borrower and the other interested parties of the intention to recover the collateral, to provide them with the relevant information and documents and to give them a reasonable period of time to object or to repay the debt. It also establishes the rules for the valuation, the sale and the distribution of the proceeds of the collateral, as well as for the protection of the rights and interests of the borrower and the third parties.

Lithuania

Lithuania has transposed the CSD through the Act on Credit Servicers and Credit Purchasers (Lietuvos Respublikos kreditų administratorių ir kredito pirkėjų įstatymas, No. XIV-2895), published in the Teąsės aktų registras on 24 July 2024, together with amendments to the Bank of Lithuania Act, the Consumer Credit Act and the Real Estate Related Credit Act. The Bank of Lithuania, as the NCA, supervises the credit institutions and the credit servicers and issues guidelines and recommendations on NPL identification, classification, provisioning and reporting. The credit servicers are subject to licensing, capital, governance and conduct requirements and must comply with the consumer protection and data protection rules. The credit purchasers are not subject to licensing or supervision but must inform the borrowers and the Bank of Lithuania of any NPL transfer and must respect the borrowers' rights and obligations under the original credit agreement.

The market for NPL transactions and servicing in Lithuania is relatively small and underdeveloped but has shown some signs of growth and diversification in recent years. The main drivers of NPL sales are the credit institutions, which seek to reduce their NPL portfolios and improve their capital and profitability ratios. The main buyers are foreign investors, such as private equity funds, hedge funds and asset management companies, which often use local credit servicers to collect and recover the NPLs. The main challenges for NPL transactions and servicing in Lithuania are the limited availability and quality of data on the NPLs and the borrowers, the lengthy and costly enforcement and recovery procedures, especially for secured NPLs, the tax and accounting implications of NPL sales and write-offs and the consumer protection and social aspects of NPL resolution, such as the prevention of over-indebtedness and the protection of vulnerable borrowers.

Luxembourg

Luxembourg's implementation of the CSD was achieved through the Law of 15 July 2024 on the Transfer of Non-Performing Credits (Loi du 15 juillet 2024 relative au transfert de crédits non performants), published in the Mémorial A No. 292 on 18 July 2024. This comprehensive law transposed Directive (EU) 2021/2167 and also implemented Regulation (EU) 2022/2036, while amending the Code of Consumption, the Law of 5 April 1993 on the Financial Sector, the Law of 23 December 1998 creating the CSSF, and the Law of 22 March 2004 on Securitisation. Luxembourg designated the Commission de Surveillance du Secteur Financier (**CSSF**) as the NCA for the authorisation and supervision of credit servicers. Notably, Luxembourg extended the scope of the law to include not only credit servicers dealing with NPLs originated by credit institutions but also those servicing loans originated by certain non-bank lenders, such as investment firms and other financial institutions, where these are subject to Luxembourg prudential supervision. This broadening of scope reflects Luxembourg's traditionally expansive approach to financial sector regulation.

While the CSD requires credit servicers to obtain authorisation, Luxembourg has introduced additional fit and proper requirements for the management and significant shareholders of credit servicers. The CSSF conducts a detailed assessment of the professional standing, experience and financial soundness of these individuals, which in practice may mirror the standards applied to other regulated financial sector professionals in Luxembourg. Furthermore, Luxembourg law imposes ongoing reporting obligations, including expectations for the submission of annual audited financial statements and periodic activity reports to the CSSF.

Luxembourg's implementation places a particular emphasis on consumer protection, reflecting the country's strong tradition in this area. The law includes enhanced information obligations towards borrowers, especially consumers and micro-enterprises, which may exceed the CSD's minimum standards in practice. For example, credit servicers are generally expected to provide borrowers with clear and detailed information about the transfer of their loan and the identity of the new servicer, as well as maintain accessible complaint-handling procedures. The CSSF is also empowered to issue additional conduct of business rules to ensure fair treatment of borrowers.

Luxembourg adopted transitional provisions that allow existing credit servicers operating prior to the law's entry into force to continue their activities for a limited period while they seek authorisation. However, the Luxembourg law requires these entities to notify the CSSF and comply with certain minimum conduct requirements during the transitional period, which is more prescriptive than the Directive's approach.

The Luxembourg law provides the CSSF with a broad range of supervisory and enforcement powers, including the ability to impose administrative fines, order the cessation of unauthorised activities and publish sanctions. The thresholds for certain sanctions are higher than those set out in the CSD, reflecting Luxembourg's commitment to maintaining the integrity of its financial sector.

Malta

The CSD was implemented into Maltese law primarily through the Credit Servicers and Credit Purchasers Act (Cap. 645), published in the Malta Government Gazette No. 21,291 on 30 July 2024, together with the Credit Servicers and Credit Purchasers Act (Passporting) Regulations, 2024 and amendments to the Consumer Credit Regulations and Credit Agreements for Consumers relating to Residential Immovable Property Regulations. Malta's implementation introduces several jurisdiction-specific nuances that go beyond the minimum EU requirements.

The Act explicitly carves out certain activities from its scope, such as the servicing of credit agreements by credit institutions themselves, alternative investment fund managers (**AIFMs**)—entities authorised to manage alternative investment funds under Directive 2011/61/EU—acting for their funds and certain non-credit institutions already subject to national supervision under other EU directives. Notably, the Act also exempts the servicing of credit agreements executed by public notaries, marshals, or lawyers when such activities are part of their professional practice—an exemption not expressly detailed at the EU level.

While the CSD requires authorisation of credit servicers by the home Member State, Malta's regime is understood to be particularly prescriptive regarding the information and documentation required for authorisation. For example, applicants are typically expected to provide detailed evidence of governance arrangements and internal controls as well as the good repute and competence of both management and qualifying shareholders. In addition, Malta expects applicants to demonstrate compliance with AML procedures under the separate EU and national anti-money laundering framework-an obligation that arises independently of the CSD but which the MFSA assesses in the context of the authorisation process. The Maltese competent authority, the Malta Financial Services Authority (**MFSA**), is empowered to issue additional Credit Servicing Rules and Conduct of Business Rules, which may impose further requirements or conditions tailored to the local context.

Malta's implementation introduces specific restrictions on outsourcing. While the CSD allows for outsourcing of credit servicing activities, the Maltese Act generally prohibits the outsourcing of all credit servicing activities simultaneously and expects that the credit servicer retains direct access to all relevant information. Furthermore, after the termination of an outsourcing agreement, the servicer is expected to demonstrate it has the expertise and resources to resume the outsourced activities. These expectations are designed to ensure robust local oversight and continuity of service, reflecting a more conservative approach than the CSD's minimum standards.

The Maltese framework reinforces consumer protection by expecting credit servicers to have the means to communicate in Malta's official languages or in the language of the credit agreement. This is particularly relevant in a bilingual jurisdiction and is intended to ensure that borrowers are not disadvantaged by cross-border servicing arrangements. Additionally, the Act clarifies that the level of consumer and borrower protection under both EU and national law remains unaffected by the transfer of creditor rights and that Maltese consumer protection, contract and civil law continue to apply post-transfer.

Malta's implementation places significant emphasis on anti-money laundering compliance, reflecting the country's broader regulatory focus in this area. Although AML obligations do not derive from the CSD itself, credit servicers in Malta are required to establish detailed AML procedures under the applicable EU and national anti-money laundering framework, and the MFSA is granted broad powers to issue directives, require information and impose administrative penalties or even criminal sanctions for breaches. The Act also allows for the imposition of higher fines than those set out in the Directive, where necessary to ensure compliance with EU law.

While the Directive mandates cooperation between home and host authorities, Malta's legislation elaborates on the mechanisms for information sharing, on-site inspections and the imposition of remedial measures.
The MFSA is authorised to act on its own initiative in urgent cases to protect borrowers' interests and to communicate any enforcement actions to other relevant EU authorities. The Act also provides for appeals to a local tribunal if the MFSA fails to fulfil its notification obligations in the passporting process.

Netherlands

To facilitate the development of a secondary market for NPLs in the EU, the Netherlands has transposed the CSD into its national law through the Implementation Act on the Credit Servicers and Credit Purchasers Directive (Implementatiewet richtlijn kredietservicers en kredietkopers), published on 17 July 2025, together with the Implementation Decree (Implementatiebesluit richtlijn kredietservicers en kredietkopers) and the Implementation Regulation (Implementatieregeling richtlijn kredietservicers en kredietkopers). Dutch law did not previously require a specific license for credit servicers as such but rather regulated the activities through broader financial supervision laws, such as the Wet op het financieel toezicht (**Wft**). With the implementation of the Directive, the Netherlands introduced a dedicated authorisation regime for credit servicers, administered by the Dutch Authority for the Financial Markets (**AFM**) unless they are exempted or already authorised as a bank, an investment firm, a payment institution or an electronic money institution. However, the Dutch regime is characterised by a streamlined application process, reflecting the national preference for minimising administrative burdens and facilitating market entry, provided that the core EU requirements on governance, reputation and consumer protection are met.

Credit purchasers are entities that acquire the creditor's rights under a credit agreement, either directly or indirectly, by means of a securitisation or a sub-participation (an arrangement whereby a party acquires an economic interest in a loan without a formal legal transfer of the creditor's rights). Credit purchasers need to obtain a declaration of no objection from the Dutch Central Bank (**DNB**), unless they are exempted or already authorised as a bank, an investment firm, a payment institution or an electronic money institution. Credit purchasers are also subject to various obligations, such as acting in good faith, treating borrowers fairly, providing information and keeping records.

Credit service providers are entities that, on behalf of a credit servicer or a credit purchaser, perform certain activities related to the management or enforcement of credit agreements, such as contacting borrowers, collecting payments, initiating legal proceedings or selling collateral. Credit service providers do not need a licence or a declaration of no objection, but they need to be registered with the AFM and comply with the conduct rules applicable to credit servicers and credit purchasers.

Dutch law also regulates the transfer and enforcement of credit agreements, in accordance with the CSD. Creditors must provide all necessary information to credit servicers before entering a contract to transfer a credit agreement, including the likelihood of recovery of the value of the NPL prior to the sale, the creditor's rights under the NPL agreement and, if applicable, information regarding the collateral. Credit servicers and credit purchasers must notify borrowers of an NPL sale and ahead of the first debt collection, providing specific information, such as the date of transfer, identification, contact details and authorisation of the new credit servicer or credit service provider. Credit servicers and credit purchasers must also respect the rights and obligations of borrowers under the original credit agreement, unless they obtain the consent of the borrower to modify them.

Dutch law has long placed a strong emphasis on consumer protection, particularly in the context of credit agreements. While the Directive sets minimum standards for the fair treatment of borrowers and the handling of complaints, the Netherlands has opted to maintain and, in some respects, enhance its existing consumer protection measures. For example, the Dutch implementation includes detailed expectations for the handling of borrower complaints, building on the established national system for financial dispute resolution (Kifid—the Dutch Financial Services Complaints Tribunal). Additionally, the Netherlands has integrated the Directive's data protection requirements with the robust national implementation of the GDPR, with the result that credit servicers are generally expected to adhere to high standards regarding the processing and storage of personal data, with explicit reference to Dutch data protection authorities' guidance.

Poland

The NPL market and the debt collection sector in Poland have been growing in recent years, as banks and other creditors have been selling their NPL portfolios to specialised entities, such as credit servicers and credit purchasers. Poland has transposed the CSD into its national law through the Act on Credit Servicers and Credit Purchasers (Ustawa o podmiotach obsługujących kredyty i nabywcach kreditów), published in Dziennik Ustaw on 4 February 2025, together with amendments to the Act on Consumer Credit, the Act on Financial Market Supervision, and the Act on Public Statistics. Poland has not introduced any national deviations or exemptions from the CSD requirements, except for those allowed by the CSD itself. The NCA responsible for the CSD is the Polish Financial Supervision Authority (Komisja Nadzoru Finansowego, **KNF**). The KNF has established and maintains the following public registers on its website:

- The Register of Credit Servicers and Credit Purchasers (Rejestr Usługodawców i Nabywców Wierzytelności, RUNW), which contains information on the identity, contact details and authorisation status of credit servicers and credit purchasers operating in Poland or providing cross-border services in Poland.
- The Register of Credit Agreements (Rejestr Umów Kredytowych, RUK), which contains information on the identity of the creditor and the borrower, the date and amount of the credit agreement, the type and value of the collateral and the status of the credit agreement (performing or non-performing).
- The Register of Collateral (Rejestr Zabezpieczeń, RZ), which contains information on the type, value and location of the collateral, the identity of the creditor and the borrower and the date and amount of the credit agreement secured by the collateral.
- The Register of Credit Service Providers (Rejestr Podmiotów Świadczących Usługi Kredytowe, RPSUK), which contains information on the identity, contact details and authorisation status of credit service providers operating in Poland or providing cross-border services in Poland.

Portugal

Portugal has implemented the CSD through Decree-Law No. 103/2025 of 11 September 2025 (Decreto-Lei n.º 103/2025, de 11 de setembro), published in Diário da República No. 175/2025, which transposes Directive (EU) 2021/2167 and harmonises access to and exercise of the management of non-performing bank credits, defining requirements for credit purchasers. The Decree-Law establishes a comprehensive regime for the authorisation, supervision and conduct of credit servicers and credit purchasers, as well as for the out-of-court enforcement of collateral by credit servicers on behalf of credit purchasers.

Credit servicers are defined as entities that, on a professional basis, manage or enforce credit agreements on behalf of creditors or credit purchasers, or acquire the creditor's rights under such agreements. Credit purchasers are defined as entities that acquire the creditor's rights under credit agreements, regardless of whether they are established in Portugal or in another EU Member State. Both credit servicers and credit purchasers must obtain an authorisation from the Bank of Portugal, the national authority responsible for the prudential and conduct supervision of these entities and comply with a set of organisational, capital and reporting requirements.

The Decree-Law also regulates the transfer of NPLs and the protection of borrowers' rights, in accordance with the CSD's core conduct requirements (as summarised above). Creditors must provide all necessary information to credit servicers before entering a contract to transfer a credit agreement. Credit servicers and credit purchasers must notify borrowers of an NPL sale and ahead of the first debt collection, providing the required information on the transfer and amounts due.

The Decree-Law introduces a new mechanism for the out-of-court enforcement of collateral by credit servicers on behalf of credit purchasers, subject to certain conditions and safeguards. The mechanism applies to credit agreements secured by movable or immovable property, provided that the borrower has given its express and informed consent to the out-of-court enforcement in the credit agreement or in a subsequent document and that the credit agreement has been registered in a public registry. The out-of-court enforcement can be initiated by the credit servicer after the occurrence of an event of default and must follow a specific procedure that involves notifying the borrower and other interested parties, appointing an independent appraiser to value the collateral and selling the collateral through a public auction or a direct sale. The out-of-court enforcement can be challenged by the borrower or other interested parties before a court, on limited grounds, such as the invalidity of the consent, the non-compliance with the procedure, or the disproportionality of the sale price.

Romania

Romania implemented the CSD by adopting the Emergency Ordinance No. 15/2024 on Credit Servicers and Credit Purchasers (Ordonanța de urgență nr. 15/2024 privind administratorii de credite și cumpărătorii de credite), published in Monitorul Oficial No. 188 on 7 March 2024, together with Order No. 480/2024 on the procedure, documentation and information necessary for authorisation of credit servicers, published in Monitorul Oficial No. 411 on 7 May 2024. The law applies to credit servicers and credit purchasers operating in Romania, as well as to creditors and borrowers involved in NPL transactions.

The Law no. 296/2023 also defines credit servicing activities in line with the CSD, as the administration and enforcement of credit agreements, including the collection of information, the management of payments, the monitoring of compliance, the restructuring and refinancing of loans, the recovery of amounts due and the realisation of collateral.

The NCA for authorising and supervising credit servicers in Romania is the National Bank of Romania (Banca Națională a României, **BNR**). Credit servicers must obtain an authorisation from BNR before carrying out credit servicing activities in Romania, unless they are already authorised in another Member State and have notified BNR of their intention to provide cross-border services. To obtain an authorisation, credit servicers must meet certain requirements, such as having a registered office and a management board in Romania, having sufficient capital and liquidity, having adequate internal policies and procedures, having fit and proper managers and staff and having professional indemnity insurance. Credit servicers must also comply with the CSD's core conduct requirements (as summarised above) and cooperate with BNR.

Credit purchasers must inform BNR of the acquisition of NPLs originated in Romania within 15 days of the transfer of the creditor's rights and provide details of the appointed credit servicer or the designated representative, if applicable. Credit purchasers must also inform BNR of any subsequent transfer of NPLs to another credit purchaser within the same deadline. BNR has the power to impose sanctions and remedies in case of breach of the CSD or the national law by credit servicers or credit purchasers. These may include fines, suspension or withdrawal of authorisation, injunctions, or restitution orders. Borrowers also have the right to lodge complaints with BNR or to seek judicial redress in case of violation of their rights or interests by credit servicers or credit purchasers.

Slovakia

Slovakia has transposed the CSD's framework for credit purchasers and credit servicers into its national law by adopting Act No. 106/2024 Coll. on Credit Servicers and Credit Purchasers and on Amendments to Certain Acts (Zákon č. 106/2024 Z.z. o správcoch úverov a nákupcoch úverov a o zmene a doplnení niektorých zákonov), published on 20 May 2024. The Act defines credit purchasers as legal entities that acquire creditor's rights under credit agreements from credit institutions or other creditors and credit servicers as legal entities that provide credit servicing activities on behalf of credit purchasers or creditors.

The Act requires credit purchasers and credit servicers to obtain an authorisation from the National Bank of Slovakia (**NBS**), which is the NCA for supervising and enforcing the Act. The authorisation process involves submitting an application with various documents and information, such as the identity and qualifications of the management and shareholders, the business plan and the internal policies and procedures and paying a fee of EUR 5,000. The NBS has 90 days to decide on the application and may refuse it if the applicant does not meet the legal requirements or poses a threat to the stability of the financial market or the protection of consumers.

Credit purchasers and credit servicers are subject to various obligations under the Act, as well as under other relevant legislation, such as the Consumer Credit Act, the Civil Code, the Code of Civil Procedure, the Personal Data Protection Act and the Act on Out-of-Court Settlement of Consumer Disputes.

The NBS has the power to impose administrative sanctions and remedial measures on credit purchasers and credit servicers that breach the Act or other relevant legislation. The sanctions may include fines of up to EUR 500,000, or up to 10% of the annual net turnover, or up to twice the amount of the benefit derived from the breach, whichever is higher. The remedial measures may include orders to cease or remedy the breach, to restore the situation to the state before the breach, to compensate the borrowers, or to revoke the authorisation.

Slovenia

The CSD was transposed into Slovenian law by the Act on Credit Purchasers and Credit Servicers of Non-Performing Bank Loans (Zakon o kupcih in serviserjih nedonosnih kreditov bank), published in Uradni list RS No. 12/2024 on 9 February 2024.

The ZOSTUDT regulates the provision of credit servicing and credit purchasing activities in Slovenia, as well as the cross-border provision of such activities within the EU.

The Bank of Slovenia (Banka Slovenije), as NCA, publishes a list of authorised credit servicers and credit purchasers on its website and updates it regularly. Credit servicers and credit purchasers authorised in Slovenia can provide their services in other Member States, provided they notify the Bank of Slovenia and the relevant host NCA in advance.

Credit servicers and credit purchasers must also provide the Bank of Slovenia with regular information on their identity, ownership and activities, as well as on the NPLs they service or purchase. This information is used for statistical and supervisory purposes and may also be shared with other NCAs and the EBA.

The Bank of Slovenia monitors the compliance of credit servicers and credit purchasers with the CSD and national law. The ZOSTUDT grants the Bank of Slovenia the power to impose administrative sanctions and measures for breaches of the ZOSTUDT, such as fines, warnings, suspensions, or revocations of authorisations and to cooperate with other NCAs and the EBA in ensuring the effective and consistent application of the CSD and the ZOSTUDT.

Spain

Spain, as a Member State with a significant volume of NPLs and a complex financial services landscape, has not yet completed its transposition of the CSD. Unlike other Member States that transposed the Directive by the 29 December 2023 deadline, Spain has failed to notify the European Commission of any national transposition measures. The transposition process remains ongoing, with draft legislation under consideration by the Spanish Parliament. This delay has, in theory, created regulatory uncertainty for credit servicers and credit purchasers operating in or seeking to enter the Spanish market.

Pending the completion of Spain's transposition process, market participants should be aware that the CSD's direct effect may be limited in the absence of implementing legislation. In principle, once transposed, Spain's CSD framework is expected to designate the Bank of Spain (**Banco de España**) as the NCA for the authorisation and supervision of credit servicers. Based on Spain's established approach to financial sector governance,

the anticipated transposition is expected to include additional requirements on the organisational structure of credit servicers, including provisions on the segregation of client funds and expectations that certain key functions maintain a physical presence in Spain. Furthermore, Spain is expected to require that senior management and significant shareholders of credit servicers undergo a fit-and-proper assessment, with criteria that may be more granular than those set out at the EU level.

While the CSD establishes a baseline for borrower protection, Spain's anticipated implementation is expected to introduce enhanced safeguards for consumers. For example, Spanish supervisory practice is expected to require credit servicers to provide borrowers with information in Spanish and, where applicable, in the co-official languages of the relevant autonomous communities. Additionally, Spain is likely to maintain and, in some cases, strengthen its pre-existing rules on the fair treatment of borrowers, including procedures for handling complaints and disputes and specific expectations to refer vulnerable borrowers to social services or debt advice agencies. These measures would be rooted in Spain's broader consumer protection framework and are intended to address the social impact of NPL management, particularly in the context of mortgage enforcement and residential property.

The CSD allows Member States to determine whether credit servicers may receive and hold funds from borrowers. Spain has taken a restrictive approach, generally prohibiting non-bank credit servicers from holding client funds directly, unless they meet certain requirements regarding fund segregation, insurance and reporting. This reflects concerns about the potential risks to borrowers in the event of a servicer's insolvency and aligns with Spain's cautious stance on the entry of non-bank entities into core financial intermediation activities.

Although the CSD provides for a passporting regime for credit servicers, Spain's transposition law includes specific notification and registration requirements for foreign credit servicers operating on a cross-border basis. These requirements are designed to ensure that the Banco de España retains effective oversight of all entities servicing Spanish loans, regardless of their country of origin. Moreover, Spain has clarified the application of its data protection and anti-money laundering laws to credit servicers, requiring compliance with national standards that may exceed the minimum EU requirements, particularly in relation to the processing of personal data and the reporting of suspicious transactions.

Sweden

The CSD was transposed into Swedish law by amendments to the Consumer Credit Act and the Debt Collection Act. The Swedish Financial Supervisory Authority (**FSA**) is the NCA for credit servicers and credit purchasers and maintains a public register of authorised credit servicers on its website.

Credit servicers and credit purchasers must obtain authorisation from the FSA before engaging in credit servicing or credit purchasing activities in Sweden, unless they benefit from an exemption or a passporting right under the CSD. Credit servicers and credit purchasers authorised in another EU Member State can provide their services in Sweden, provided they notify the FSA and their home NCA in advance.

Credit servicers and credit purchasers must comply with the CSD requirements, as well as the FSA regulations and general guidelines on credit servicing and credit purchasing, which specify the conditions and procedures for authorisation, supervision, reporting and cooperation with other NCAs. Credit servicers and credit purchasers must also respect the rights and obligations of borrowers and creditors under the Consumer Credit Act, the Debt Collection Act and the relevant credit agreements.

Credit servicers and credit purchasers are subject to the FSA's supervisory and sanctioning powers, which include the ability to impose administrative sanctions, such as fines, withdrawal of authorisation, or injunctions, for breaches of the CSD or the national rules. The FSA can also cooperate and exchange information with other NCAs, the EBA and the European Commission, in accordance with the CSD and the FSA regulations and guidelines.

Debt collection activities in Sweden are regulated by the Debt Collection Act and the Consumer Protection Act and supervised by the Swedish Consumer Agency. Debt collectors must obtain a permit from the Consumer Agency before engaging in debt collection and must comply with the rules and principles of good debt collection practice, which include the obligation to act in good faith, treat debtors fairly and avoid misleading or harassing actions. Debt collectors must also provide debtors with specific information about the debt, the creditor and the debt collector, as well as the debtor's rights and remedies.

Debt collection activities are subject to the Consumer Agency's supervisory and sanctioning powers, which include the ability to issue injunctions, fines, or revoke permits for debt collectors who violate the Debt Collection Act or the Consumer Protection Act. The Consumer Agency can also cooperate and exchange information with other supervisory authorities, the FSA and the European Commission, in accordance with the national and EU rules.

The enforcement of debts in Sweden is governed by the Enforcement Code and carried out by the Swedish Enforcement Authority, which is a public authority independent from the creditors, the debt collectors and the FSA. The Enforcement Authority can enforce court judgments and other claims, such as tax debts, fines, or maintenance payments, by seizing assets, garnishing wages, or selling property of debtors who fail to pay their debts. The Enforcement Authority can also cooperate and exchange information with other enforcement authorities, the FSA and the European Commission, in accordance with the national and EU rules.

Supervisory reality: Where NCAs are focusing

Understanding what NCAs are actually looking for-and where enforcement is being directed-is essential for effective compliance. Based on thematic inspections, supervisory communications and early enforcement actions across Member States, the following areas are attracting the most scrutiny:

Priority areas for credit servicers include:

1. **Ensure compliance with authorisation conditions:** Ensure that the credit servicer meets all the requirements for authorisation, including governance, risk management and operational standards. Credit servicers that were carrying on credit servicing activities on 30 December 2023 had to obtain an authorisation from the home Member State by 29 June 2024. Credit servicers that intend to start carrying on credit servicing activities after 29 June 2024 have to obtain an authorisation before doing so. Credit servicers accordingly should ensure that they meet the conditions and requirements for authorisation, such as having a registered office and a head office in the same Member State, having sufficient initial capital and own funds, having adequate governance and internal control arrangements, having fit and proper management and staff and having appropriate policies and procedures on data protection and consumer protection. In addition, although not a requirement of the CSD itself, credit servicers should ensure they have robust policies and procedures to address anti-money laundering and counter-terrorist financing risks, given that NCAs increasingly assess AML/CTF preparedness as part of their broader supervisory engagement with the sector.
2. **Implement robust policies and procedures:** Develop and maintain own policies and procedures and ensure standards of credit servicers are aligned with the conduct rules set out in the CSD as well as any other national requirements on (i) debt collection (ii) how to fairly treat and engage with borrowers in financial difficulty and/or (iii) vulnerable customers. Ensure that these policies and procedures are well-documented and accessible to relevant staff.
3. **Training and competence:** Ensure comprehensive training to staff to ensure they understand the CSD requirements and how to apply them in their roles. Maintain records of training and assessments of staff competence.
4. **Consumer engagement and transparency:** Establish clear and effective communication channels with consumers. Provide consumers with all required information in a transparent and understandable manner.

5. **Record-keeping:** Keep detailed records of all credit servicing activities, including interactions with consumers and decisions made regarding credit agreements. Ensure that records are easily retrievable f or inspection by the NCA.
6. **Regular reviews and audits:** Conduct regular internal and counterparty reviews and audits to assess compliance with the CSD. Address any identified deficiencies promptly and effectively.
7. **Reporting and notification:** Report to the NCA as required by the CSD, including any significant events or changes in the firm's circumstances. Notify the authority of any breaches or potential breaches of the CSD.

For credit purchasers, the message is equally clear: NCAs expect robust oversight of appointed servicers, documented governance arrangements and genuine accountability for borrower outcomes-regardless of whether day-to-day servicing is outsourced.

For non-EU credit purchasers, representative arrangements are under particular scrutiny. NCAs have signalled that 'letterbox' presences will not satisfy regulatory expectations. Representatives must have genuine capacity, resources and expertise to discharge CSD obligations-including cooperation with NCAs and handling of borrower complaints.

Key strategic implication: Supervisory expectations are evolving faster than the written rules. Firms that calibrate compliance only to the letter of the Directive-without regard to emerging supervisory practice-will find themselves behind the curve.

The road ahead: Regulatory trajectory and market evolution

The CSD framework will continue to evolve. The Commission's December 2025 review has identified areas for potential enhancement, and further amendments to the Directive or related technical standards are anticipated. Four areas warrant particular attention:

1. The harmonisation and consistency of the transposition and implementation of the CSD in each Member State and the reduction or elimination of any deviations or specificities that may create fragmentation or confusion in the application and interpretation of the CSD across the EU.
2. The coordination and cooperation of the NCAs and the other market participants and the establishment and use of common platforms, mechanisms and tools to facilitate the exchange and disclosure of information, data and documents relating to the NPL transactions and to ensure the transparency, accuracy and efficiency of the process.
3. The clarification and refinement of the scope and definition of the key terms and concepts under the CSD, such as credit servicers, credit service providers, credit purchasers, credit agreements and NPLs and the inclusion or exclusion of any scenarios or situations that may arise in the NPL market, such as the servicing and purchase of other non-performing exposures that are not in scope of the CSD.
4. The alignment and integration of the CSD with other EU and national rules and expectations on NPLs, such as the EBA and European Central Bank (**ECB**) guidelines, the CRR, the MCD and the CCD II and the resolution or prevention of any inconsistencies or conflicts that may affect the coherence and comprehensiveness of the framework for the NPL market.

Key dates and remediation priorities

Given the practical focus of this Client Alert, the following summary of key dates and deadlines may assist firms in tracking their compliance obligations:

- **29 December 2023**: CSD transposition deadline for all Member States; national implementing legislation entered into force.
- **30 December 2023**: CSD framework became fully operational; credit servicers already operating could continue activities under transitional arrangements.
- **27 June 2024**: EBA Guidelines on the assessment of adequate knowledge and experience of credit servicer management bodies became applicable.
- **29 June 2024**: Deadline for credit servicers operating on 30 December 2023 to obtain authorisation from their home Member State NCA.
- **Early 2025**: EBA Guidelines on complaints handling for credit servicers became applicable across all NCAs.
- **17 January 2025**: Digital Operational Resilience Act (DORA) became applicable; credit servicers within scope must ensure ICT risk management compliance.
- **20 November 2025**: Transposition deadline for the revised Consumer Credit Directive (CCD II).
- **December 2025**: European Commission delivered its review of the CSD, examining borrower protection, supervisory convergence and passporting effectiveness.
- **November 2026**: CCD II application date; additional consumer protection standards will overlap with CSD obligations.

For firms that have identified compliance gaps or that were operating under transitional arrangements that have now expired, prompt remediation is essential. The transitional period for credit servicers already operating on 30 December 2023 to obtain authorisation ended on 29 June 2024. Firms that continued to operate without authorisation beyond that date are in breach of the CSD and may be subject to enforcement action by their home or host NCAs. Accordingly, in terms of remediation, this means that:

- **Immediate steps for unauthorised operators**: Firms that have not yet obtained authorisation should: (i) cease credit servicing activities in relation to NPLs within the scope of the CSD until authorisation is obtained; (ii) engage proactively with their home Member State NCA to discuss the path to authorisation and any interim measures that may be required; (iii) conduct a comprehensive gap analysis to identify deficiencies in governance, internal controls, policies and procedures relative to CSD requirements; and (iv) consider whether outsourcing servicing activities to an authorised credit servicer may be appropriate as an interim or permanent solution.
- **Remediation for authorised firms with compliance gaps**: Firms that have obtained authorisation but have identified compliance gaps in their operations should: (i) conduct a thorough internal review to identify the root causes of the deficiencies; (ii) develop and implement a remediation plan with clear timelines and accountability; (iii) consider whether proactive disclosure to the NCA is appropriate, particularly where the deficiencies may affect borrower outcomes or the firm's ability to meet its ongoing regulatory obligations; (iv) enhance training and competence frameworks for staff involved in credit servicing activities; and (v) strengthen monitoring and assurance processes to prevent recurrence.
- **Credit purchasers and representatives**: Credit purchasers that have acquired NPLs without making the required notifications to NCAs, or non-EU credit purchasers that have not established adequate representative arrangements, should take immediate steps to regularise their position. This includes: (i) making all outstanding notifications to relevant NCAs; (ii) reviewing and, where necessary, enhancing representative arrangements to ensure they meet supervisory expectations for substance and capability; and (iii) ensuring that appointed credit servicers are authorised and that servicing agreements contain the required provisions.

Engaging with NCAs: Firms that have identified material compliance gaps should consider the benefits of proactive engagement with their NCA. Early and transparent engagement can demonstrate good faith, may influence the severity of any enforcement response and can help the firm to understand supervisory expectations and priorities. NCAs generally view proactive disclosure and remediation efforts favourably when determining the appropriate regulatory response to identified breaches.

Strategic outlook: Positioning for success

The CSD has delivered significant structural change to the EU NPL market-and the transformation is far from complete. In our current view, three strategic realities will define the market over the coming years:

1. For financial services firms operating in the EU NPL market, the practical reality is one of navigating a dual challenge: compliance with the Directive's harmonised baseline requirements, alongside careful attention to the jurisdiction-specific rules, supervisory expectations and market conventions that continue to apply in each Member State. This complexity is compounded by the evolving nature of supervisory practice. NCAs are actively refining their approaches to CSD supervision, with thematic inspections, enforcement actions and supervisory communications increasingly shaping market participants' understanding of what good compliance looks like in practice. Early supervisory trends-focusing on borrower communications, outsourcing governance and internal controls-signal that NCAs are prepared to take robust action where standards fall short.
2. Looking ahead, firms should anticipate continued regulatory development. The European Commission's review of the CSD, delivered in December 2025, may inform future legislative or technical amendments to the framework, potentially addressing identified gaps in borrower protection, supervisory convergence or the passporting regime. The interplay between the CSD, the revised Consumer Credit Directive (CCD II) and the Mortgage Credit Directive (MCD) will also require ongoing attention, as consumer protection standards across the EU credit market continue to evolve. In this environment, proactive compliance monitoring, robust horizon-scanning and engagement with NCAs will be essential. Firms that invest in understanding not only the letter of the law but also the emerging supervisory expectations in each jurisdiction will be best positioned to manage risk, maintain market access and build trust with borrowers and regulators alike.
3. While the CSD’s harmonisation of rules and increased regulatory oversight have provided legal certainty and contributed to market efficiency and consumer confidence, the full extent of its lasting effects will continue to evolve as the CSD is implemented and integrated into the legal systems of EU Member States.

About us

PwC Legal is assisting a number of financial services firms and market participants in forward planning for changes stemming from relevant related developments. We have assembled a multi-disciplinary and multijurisdictional team of sector experts to support clients navigate challenges and seize opportunities as well as to proactively engage with their market stakeholders and regulators.

Moreover, we have developed a number of RegTech and SupTech tools for supervised firms, including PwC Legal's Rule Scanner tool, backed by a trusted set of managed solutions from PwC Legal Business Solutions, allowing for horizon scanning and risk mapping of all legislative and regulatory developments as well as sanctions and fines from more than 2,500 legislative and regulatory policymakers and other industry voices in over 170 jurisdictions impacting financial services firms and their business.

Equally, in leveraging our Rule Scanner technology, we offer a further solution for clients to digitise financial services firms' relevant internal policies and procedures, create a comprehensive documentation inventory with an established documentation hierarchy and embedded glossary that has version control over a defined backward plus forward looking timeline to be able to ensure changes in one policy are carried through over to other policy and procedure documents, critical path dependencies are mapped and legislative and regulatory developments are flagged where these may require actions to be taken in such policies and procedures.

The PwC Legal Team behind Rule Scanner are proud recipients of ALM Law.com's coveted "2024 Disruptive Technology of the Year Award" and the "2025 Regulatory, Governance and Compliance Technology Award in 2025".

If you would like to discuss any of the developments mentioned above, or how they may affect your business more generally, please contact any of our key contacts or PwC Legal's RegCORE Team via de_regcore@pwc.com or our website.

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