

Ref No	DI/CP45-R/2026	Issued on	22 September 2026
TITLE	Response to the Industry Feedback on the Exposure Draft on Guidance Paper for Resolvability Assessment – Data and Management Information Systems in Resolution for Deposit-Taking Members		

3.3 **Exposure Draft on Guidance Paper for Resolvability Assessment - Data and Management Information Systems in Resolution**

Respondents generally supported the proposed requirements and acknowledged the importance of timely data in supporting resolution preparedness. Feedback focused on the scope and timeliness expectations of Resolution-Related Data, as well as guidance on deposit account modification requirements to promote consistent application across the industry.

a. Capability to Generate Resolution-Related Data

Feedback Received

Industry feedback centred on the need for greater clarity regarding the depth and breadth of Resolution-Related Data. Respondents suggested that PIDM publish additional guidance to enhance understanding and support consistent implementation

Some respondents highlighted the legal and operational challenges associated with effecting the deposit account modifications, particularly in relation to internal governance and customer communication. Respondents suggested that PIDM publish a clear framework to support consistent interpretation and application across the industry.

Preliminary Response by PIDM

PIDM notes the feedback received. The proposed data listings are intended to serve as illustrative examples of the types of data that may be relevant for resolution planning and execution. As data requirements may vary depending on the circumstances and the points along the stress continuum, DTMs are encouraged to maintain appropriate internal infrastructure and processes to identify and extract the relevant information as and when requested by PIDM, to facilitate timely resolution execution.

On deposit account modification, PIDM notes the suggestion to publish a specific framework to support consistent interpretation and implementation across the industry. PIDM will take into account the concerns and feedback raised by DTMs in developing and refining future guidance in this area.

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b. Capability to Generate Data in a Timely Manner

Feedback Received

Industry feedback on the generation of timely data was generally constructive. Respondents acknowledged the importance of timely data in supporting preparedness for an orderly resolution and suggested that PIDM establish clearer expectations and standards for data timeliness. Respondents also recommended that PIDM consider publishing additional guidance, including a standard template for reporting data generation times, to promote consistency and enhance preparedness across the industry.

Preliminary Response by PIDM

PIDM notes the feedback received. PIDM has not prescribed minimum report generation time standards, recognising that data generation capabilities may vary across DTMs depending on their size, complexity, operating model and existing data infrastructure. As the guidance paper for Data & MIS will be issued at a later date, PIDM will continue to engage with DTMs and take into account their circumstances, implementation progress and relevant developments when reviewing and finalising the guidance for issuance.

c. Capability to Generate Disaggregated Data

Feedback Received

Industry feedback on data disaggregation was broadly similar to the feedback on resolution-related data wherein respondents sought greater clarity on the expected depth and granularity of data required, including whether PIDM would provide a standard template or a 'minimum resolution dataset' to support consistent implementation across the industry.

Preliminary Response by PIDM

PIDM notes the feedback received. PIDM has not prescribed standard templates or uniform data requirements applicable to all DTMs at this stage, recognising that resolution data requirements may vary depending on each DTM's size, complexity, operating model, data infrastructure and the circumstances at the relevant stage of the stress continuum.



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Preliminary Response by PIDM

As the guidance paper for Data & MIS will be issued at a later date, PIDM will take into account the feedback received, including the request for additional guidance or standardised templates, when reviewing and finalising the guidance for issuance.

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