




Durable medium: digital-by-default (MiFID retail disclosures)

 Effective 12 Jan 2026

Checklist for delivery controls, evidence, and customer options

Delivery controls	Evidence	Customer options
<ul style="list-style-type: none">• Match customer identity to email address (reduce mis-delivery)	<ul style="list-style-type: none">• Store the exact issued disclosure (or verifiable copy)	<ul style="list-style-type: none">• Make paper available on request (clear + friction-light)
<ul style="list-style-type: none">• Protect sensitive disclosures (encryption + access controls)	<ul style="list-style-type: none">• Capture who (customer ref + destination address)	<ul style="list-style-type: none">• Record and honour preferences (and keep them updated)
<ul style="list-style-type: none">• Use step-up authentication where risk warrants it (e.g., multi-factor, IDV)	<ul style="list-style-type: none">• Capture when (issue time + delivery attempts)	<ul style="list-style-type: none">• Support alternative formats (accessibility/vulnerability needs)
<ul style="list-style-type: none">• Avoid “live” links to files - store a fixed, versioned copy of what you sent	<ul style="list-style-type: none">• Capture how (channel + any authentication applied)	<ul style="list-style-type: none">• Log channel switches (and why the method was appropriate)
<ul style="list-style-type: none">• Define failure handling (bounces, invalid addresses, repeated non-delivery)	<ul style="list-style-type: none">• Record status + follow-up actions (delivered / bounced / failed + what happened next)	<ul style="list-style-type: none">• Ensure service teams can manage options day-to-day (not “Compliance-only”)

Digital-by-default does not remove durable medium expectations - you still need client control, retention, and persistence for information you send.