



Spanish Tax Agency Models 170 + 196

Deadline	Frequency	File format
First deadline is end of Feb 2026 (with Jan data)	Monthly	XML

Legal Basis 

Royal Decree 253/2025 (1 Apr 2025) amending the RGAT

Submission 

The XML must align with the XSD schema, pass validation checks, and be split into files of max 10,000 records before submitting to the AEAT.

Objective 

To close information gaps created by modern payment models, so the tax authority can better detect undeclared income, hidden transactions, and tax fraud.

Considerations 

Model 196 heavy December filing: Includes YE balance, average Q4 balance, and annual totals in addition to the usual monthly data. Model 170: €3k threshold removed– all in-scope merchant payments reportable

Description 

Two new monthly declarations provide a detailed picture of payment activity connected to Spain:

- **Model 196:** Covers accounts & wallets (containers of money)
- **Model 170:** Covers card & mobile payments (movement of money)

Data fields needed 

Model 196

- **Accounts:** Account ID/ref, type, open/close date and reportable balances
- **Individuals:** Name, TIN (or passport/ID and issuing country if none), residence, DOB.
- **Corporates:** Entity name, TIN (or registration/ID and issuing country if none), plus UBO details (same fields as individuals).

Scope 

Entity: Banks, PI's and EMI's connected to Spain (including branches and firms operating in Spain under passporting)

Nexus:

- **196:** Customers with Spanish tax residency or Spanish permanent establishment.
- **170:** Merchant/professional activity connected to Spain.

Activity: Managing accounts/wallets (196) and collecting merchant payments via card/mobile/POS (170)

Model 170

- **Payments:** Type (card/mobile), date/period, transaction count and total amounts.
- **Merchants:** Merchant name and ID, TIN (or registration/ID and issuing country if none), settlement account/IBAN.
- **Channel:** POS/terminal ID (if applicable) and payment instrument ref (card/payment ID).

Next steps

- 1 Tag in-scope:**
Add "Spain reportable" tag in your customer records to drive monthly extracts.
- 2 Check tax residency vs KYC:**
Cross-check TIN/VAT, address, declared residency vs KYC and fix gaps.
- 3 Submission-ready:**
Pick a vendor to generate, validate, batch and submit the monthly XML for you.