

Data Transfer and Outsourcing Addendum

May 2026



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This addendum provides information on the various data transfer and/or outsourcing arrangements entered by Banking Circle and subject to strict confidentiality obligations. It is an integral part of the Business Terms agreed between you and Banking Circle and by which you have therefore consented to Banking Circle's data transfer and outsourcing arrangements described herein.

Banking Circle may transfer data and information to employees and other representatives of certain affiliates and/or shareholders in its group for reporting-, corporate governance-, investor relations-, and similar necessary purposes. In addition, Banking Circle has in place the data transfer and/or outsourcing arrangements with third parties as set forth below.

Full legal name of the supplier and country of establishment	Services provided	Type of information transmitted to the supplier	Country where services are rendered and data stored
Banking Circle S.A. (UK Branch)	The Sales services consist in Sales and Commercial activities. Business AML consists of 4 main activities: Onboarding, Transaction Monitoring, AML Change Management, Sanctions Screening.	<ul style="list-style-type: none"> Client Data Client Transactional Data 	EU
BC Payments Australia Pty Ltd	Transaction Monitoring, Payments Processing, Client Services, Monitoring of Treasury FX Quotation Engine.	<ul style="list-style-type: none"> Client Data KYC data Client Transactional Data 	The Netherlands
BUREAU VAN DIJK, Denmark	Information solutions for compliance and onboarding checks.	<ul style="list-style-type: none"> Client Basic and KYC data 	Belgium and Germany
Docusign, Inc.	Document signing software for collecting signatures.	<ul style="list-style-type: none"> Client data KYC data 	USA
Dynatrace A/S	IT Engineering Operations to find the root cause(s) of operational issues on our business. applications that we host ourselves Monitoring of IT Infrastructure running our business applications.	<ul style="list-style-type: none"> Client data 	The Netherlands and Ireland
Elliptic Enterprises Ltd.	Elliptic assists with infrastructure to optimize due diligence, detection of account takeovers and fraud, wallet screening module and ongoing exposure assessment for the BC issued stablecoin. Detect and identify high risk transaction and customers across addresses. Trace source and destination of funds.	<ul style="list-style-type: none"> Client Data KYC data Client Transactional Data 	Ireland
Fireblocks Ltd.	This technology is required to create safe holding of public and private key pairs. It to allow clients to transact on the blockchain but also have their virtual assets protected.	<ul style="list-style-type: none"> Client Basic Data Client Transactional Data 	Israel and EU
Gresham Technologies	This is a software as a service, only the application process is being outsourced.	<ul style="list-style-type: none"> Client Transactional data 	Luxembourg and Ireland
KeepIT	This is a software as a service, KeepIT services will be used as a backup of our Office 365 products which are Office 365 (e-mail), SharePoint online, Teams and OneDrive.	<ul style="list-style-type: none"> Client Data Client Transactional data 	Denmark
Marketing suppliers	<ul style="list-style-type: none"> Marketing suppliers may be used to contact you 	<ul style="list-style-type: none"> Client Basic Data Personal Data 	USA, Luxembourg, England, Singapore, Australia, New York

Microsoft Ireland Operations, Ltd	<p>Cloud infrastructure hosting Banking Circle's front-end, e-mail,</p> <ul style="list-style-type: none"> • Application front end (BC Connect) • Anti-money laundering and sanction screening tools • Microsoft Office software suite (email, Word, PowerPoint, Skype and Teams communications) • Customer Relationship Management system (client due diligence documentation, financial estimations of flow and fees) <p>core banking systems (online banking application, payments and SWIFT interface).</p>	<ul style="list-style-type: none"> • Client Basic and KYC data • Client Transactional data 	<p>Ireland and the European Union countries</p>
Mnemonic	<p>Mnemonic will be used as a first line monitoring service of Banking Circle IT infrastructure to ensure timely response to identified cyberattacks and vulnerabilities in our network. In case of suspected data breaches, security incidents and similar events that Banking Circle need to react upon, in order to protect our assets, then mnemonic will ensure promptly notifications to the right persons in Engineering, who can assist on the investigation.</p>	<ul style="list-style-type: none"> • Client Basic Data 	<p>Norway</p>
Notabene, Inc.	<ul style="list-style-type: none"> • Ties the response of a travel rule message to the execution of a blockchain transaction • Auto respond to incoming travel rule messages • Detect incoming blockchain transactions missing a corresponding travel rule message • Access travel rule compliance 	<ul style="list-style-type: none"> • Client Basic Data • Client Transactional Data 	<p>EEA</p>
PwC Luxembourg	<p>Submission of payments transactions reports to tax authorities.</p>	<ul style="list-style-type: none"> • Client Transactional Data 	<p>Luxembourg</p>