

Data and Outsourcing Addendum

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 set forth below.

Full legal name of the supplier and country of establishment	Services to be provided	Type of information transmitted to the supplier	Country where services are going to be rendered and data stored
ORACLE Corporation, Denmark	Data centre hosting the Infrastructure and services of Banking Circle's core banking systems (online banking application, payments and SWIFT Interface).	<ul style="list-style-type: none"> Client data and information Transaction data Security operations data 	United Kingdom
Microsoft A/S, Denmark	Cloud infrastructure hosting Banking Circle's: <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) 	<ul style="list-style-type: none"> Client data and information Transaction data 	Ireland and the Netherlands
TWILIO Inc., United States	Multi-factor Authentication solution to secure client payment activities.	<ul style="list-style-type: none"> Client data and information Transaction data 	United States
BUREAU VAN DIJK, Denmark	Information solutions for compliance and onboarding checks.	<ul style="list-style-type: none"> Client data and information 	Denmark
SWIFT SCRL, Belgium	Payment application solution offering: <ul style="list-style-type: none"> The transfer of uniform formatted data on incoming and outgoing payments in order to exchange payments globally Sanction screening for monitoring incoming and outgoing payments against sanctions lists 	<ul style="list-style-type: none"> Client data and information Transaction data 	Belgium
Saxo Bank A/S, Denmark	Online trading system enabling clients to enter into transactions for the purchase or sale of currency transactions.	<ul style="list-style-type: none"> Transaction data (no personal identifying information is transferred or shared with the service supplier). 	Denmark