

Data transfer 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 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
Microsoft Ireland Operations, Ltd	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) • core banking systems (online banking application, payments and SWIFT interface). 	<ul style="list-style-type: none"> • Client Basic and KYC data • Client Transactional data 	Ireland and the European Union countries
TWILIO Inc., United States	Multi-factor Authentication solution to secure client payment activities.	<ul style="list-style-type: none"> • Client Basic data 	United States
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
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"> • KYC data • Client Transactional data 	EEA
GlobalConnect A/S	Cloud infrastructure hosting Banking Circle's: <ul style="list-style-type: none"> • Virtual Desktop infrastructure 	<ul style="list-style-type: none"> • Client Basic and KYC data • Client Transactional data 	Denmark
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"> • Client Transactional data 	Denmark
Deloitte Tax Consulting	Regulatory reporting and Consulting	<ul style="list-style-type: none"> • Client Basic and KYC data • Client Transactional data 	Luxembourg, Denmark, and Netherland
Marketing suppliers	Marketing suppliers may be used to contact you	<ul style="list-style-type: none"> • Client Basic Data 	USA and EEA
Mnemonic	Mnemonic will be used as a first line monitoring service of Banking Circle IT infrastructure to ensure timely response	<ul style="list-style-type: none"> • Client Basic Data 	Norway

	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.		
Fireblocks	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 EU
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 	Americas, Europe, UK, and Asia-Pacific (to the choice of Banking Circle).
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