

Category	Party Name and Jurisdiction	Purpose	Data Disclosed	Adequate safeguards when transferring data to 3rd countries
1. Payment Processors				
	Aktia Bank Oyj (FI), Danske Bank A/S Finland branch (FI), Helsingin Seudun Osuuspankki (FI), Nooa Säästöpankki Oy (FI), S-Pankki Oy (FI), Svenska Handelsbanken AB (publ) Finland branch (FI)	Client monies custody services in EUR for funds on payment accounts. Online banking e-payments acquiring as a payment facilitator.	Business name of the payment receiver.	
	Crédit Mutuel Arkéa SA (FR), Arkéa Banking Services AS (FR)	Client monies custody services in EUR for funds on payment accounts, settlement services	Sender and receiver details as part of SEPA payment transactions.	
	Back Office Technology Ltd (UK), Starling Bank Ltd (UK)	Settlement services for the UK Faster Payments instant credit transfers scheme.	Sender and receiver details as part of Faster Payment and Bacs payment transactions.	
	Wirecard Bank AG (DE)	Client monies custody services in EUR, GBP, SEK, NOK, DKK for funds on payment accounts. Acquiring services on a payment facilitator basis for Visa, MasterCard, Diners Club, Discover and JCB schemes. Also integrated payment gateway services.	Name of the cardholder in a payment card transaction.	
	Global Processing Services Ltd (UK)	Processing of Mastercard payment transaction.	Cardholders name and address details. This information is needed to personalise the card and to be able to send it to customer. When troubleshooting any issues we use token or other details not revealing any personal information.	
2. Audit				
	KPMG Helsinki Oy (FI)	Financial audits	Partner names, account numbers, transaction information.	
	Ernst&Young (FI)	To test Holvi's Anti Money Laundering (AML) and Know Your Customer (KYC) controls and to carry out professional auditing services for Holvi.	For a sample of individual customer accounts: name, Holvi account number (Customer ID), total amount received on the Holvi account, total amount sent from the Holvi account, type of Holvi account, and, as the case may be, any other relevant account information.	
3. Customer Service Outsourcing				

	Zendesk, Inc (US)	To provide customer support through email or phone	Full name, contact information	Zendesk Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Zoom Video Communications, Inc.	To organise webinars for customers	Full name, email	European Commission Model Contract
	HubSpot, Inc. (US)	To send service and marketing messages, assist in direct marketing campaigns and analysis. Administer data from piloting customers.	Full name, contact information, avatar image, IP address	HubSpot, Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Slack Technologies, Inc. (US)	To organise Holvi Community events via Slack channel	Full name, email	Slack Technologies, Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	ProductBoard, Inc. (US)	To enable product development in line with customer requirements	Full name, email	ProductBoard, Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Heimo Community Oy (FI)	Holvi Community discussion forum	Full name, email	
	Makery Oy (FI)	To develop Holvi product in line with customer interviews in Finland	Full name, email, phone number	
	Fuxblau GmbH (DE)	To develop Holvi product in line with customer interviews in Germany	Full name, email, phone number	
4. Identity and Fraud Agencies				
	Comply Advantage (UK)	PEP, sanctions and adverse media checks	Full name	
	IDnow GmbH (DE)	Video based authentication service. To verify identity and carry out checks for the prevention and detection of financial crime.	Full name, address, phone number, proof of identity	
	CRIF Bürgel GmbH (DE)	To verify identity and carry out checks for the prevention and detection of crime including fraud and/or money laundering.	Name, address, date of birth and telephone number.	
	Compass-Verlag GmbH (AT)	Identification and credit data for legal persons in Austria.	Name, business name	

	DueDil Ltd (UK)	To receive business information for risk assessment, and compliance with anti-money laundering requirements, such as establishing the corporate structure and beneficial ownership.	Company registration number, name and address of business, name, address, date of birth of directors.	
	Cifas (UK)	To prevent and respond to the ongoing threat of fraud and financial crime.	Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, place of birth, company registration number, VAT number, unique business identifier reference https://www.cifas.org.uk/fpn	
	GB Group Plc (UK)	To verify identity, verify linkage between a customer and its bank account or credit/debit card, carry out checks for the prevention and detection of crime including fraud and/or money laundering.	Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, place of birth, company registration number, VAT number, unique business identifier reference.	
	Aktia Bank Oyj (FI), Danske Bank A/S Finland branch (FI), Helsingin Seudun Osuuspankki (FI), Nooa Säästöpankki Oy (FI), S-Pankki Oy (FI), Svenska Handelsbanken AB (publ) Finland branch (FI)	Electronic identification of the bank's customers via TUPAS.	Business name	
	Suomen Asiakastieto Oy (FI)	To identify and get credit data for natural and legal persons in Finland.	Name, date of birth	
	Signicat (NO)	To electronically identify Estonian identity cards.	Name, national ID	
	RIK (EE)	To identify legal persons in Estonia.	Name, date of birth	
5. Commercial Partners				
	eifas Holding GmbH (DE), Suomen Talousverkko Oy (FI), Briox Finland Oy (FI), Steueragenten (DE)	To provide accounting service offerings for our customers.	Full name, email	
	Gravatar.com / Automattic Inc. (US)	To enable personalising blog posts	Full name, email	Automattic, Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov

	Basware Oy (FI)	To enable creating invoices	Full name, email, postal address, phone number	
	Dropbox Inc. (US)	To enable exporting bookkeeping reports	Full name, email	Dropbox Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Apix Messaging Oy (FI)	Invoice digitization	Full name, contact information, financial information	
	Tilitoimisto Lemon Tree Oy (FI)	To provide accounting service for our customers.	Contact information, financial information	
6. Marketing				
	Facebook Inc (US), Facebook Ireland Limited (IE), Facebook Business Manager (SE)	To execute retargeting campaigns in order to deliver personalised advertising.	Advertising ID and device ID to segment user groups based on app behaviour, encrypted e-mail address associated with Holvi users (without indicating account relationship), IP Address, Anonymous ID generated by cookies, pixel tags or similar technologies embedded in webpages, ads and emails delivered to users. Mobile advertiser ID, IP Address and other metadata via Facebook SDK in mobile apps.	Facebook Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov .
	Adroll (US)	To execute retargeting campaigns in order to deliver personalised advertising.	IP adress, Geo coordinates, Referrer, User agent details, Timestamp	European Commission Model Contract
	Hotjar Ltd. (Malta)	To analyse and understand website visitor behavior	Email	
	Segment.io Inc. (US)	To understand customer behaviour for buiding a better product, providing better customer services and preventing fraud.	Email	European Commission Model Contract
	Lookback Group Inc. (US) SurveyMonkey Inc. (US)	To conduct customer surveys, automated and proactive campaigns, analyse marketing data	Name, age, email, phone, country	Lookback Group, Inc and SurveyMonkey, Inc provide adequate data protection under the EU-US privacy shield https://www.privacyshield.gov .
7. Operational Services				

	Workable (UK)	Recruiting	Full name, email address, headline for the application, phone number, photograph, information on education, information on work experience, summary, resume, cover letter, and answers to questions of their achievements, why they would like to work at Holvi, whether they know anyone working at Holvi, and whether the applicant is already a Holvi user.	
	Adobe Systems Incorporated (US)	To sign agreements	Full name, email address	Adobe Systems Incorporated provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Google, LLC (USA), Amazon Web Services Inc. (USA)	To provide cloud-based hosting, storage and processing services to assist and/or enable Holvi to manage users' Account Information as well as data generated through their use of Holvi and deliver, analyse and improve Holvi Services. To monitor, store, and access log files.	All account information, data generated through the use, and/or necessary for the provision of Holvi Services.	Google LLC and Amazon Web Services, Inc provide adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Functional Software Inc. (Sentry) (US)	To monitor and fix crashes in real time	IP address	Functional Software Inc. (Sentry) provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Deltagon Group Oy (FI)	Send messages securely, save data securely	email address	
	OneTrust LLC (US)	Respond to data subject right requests, give data subjects a control over the cookies placed on their browser	Full name, email address, country, IP address	OneTrust, LLC provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	DataDog Inc. (US)	To monitor cloud-scale applications	contact information, browsing information, PII	DataDog Inc. provides adequate data protection under the EU-US privacy shield https://www.privacyshield.gov
	Nexmo (Vonage Limited) (US)	To send SMS to customers	phone number	European Commission Model Contract
	E-Fax Inc. (j2 Global, Inc) (US)	Enabling to receive and send faxes	Fax number	European Commission Model Contract

	Calendly LLC (US)	Scheduling meetings	email address	European Commission Model Contract
--	-------------------	---------------------	---------------	------------------------------------