

List of Sub-Processors

1. Payment Processors

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Bank of Lithuania payment system CENTROlink (LT)	SEPA payment processing (SDD and SCT)	Sender and receiver details as part of SEPA payment transactions transmitted in the inter-PSP within the SCT and SDD schemes	
Banking Circle S.A. (LU)	Cross-border payment and foreign exchange processing (Swift)	Sender and receiver details included in Swift payment messages exchanged between participating financial institutions via the Swift network	
Bankverlag GmbH (DE)	Banking file exchange for the German market (C Record format)	First/last name, date of birth, address, tax number, IBAN	
Bottomline Technologies (UK)	SWIFT message transport	All SWIFT message content in transit	Adequacy Decision
DiXiO (UAE)	Swift connectivity and smart messaging for payments data	Sender and receiver details included in payment messages	Data stored and processed exclusively within the EEA (Ireland)

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Emerchantpay Ltd (UK)	Card payments acquiring for webshop	Transaction and payment data	Adequacy Decision
Enable Banking (FI)	Open banking data aggregation	External bank account data, transactions, consent tokens	
Global Processing Services Ltd (UK)	Processing of Mastercard payment transactions	Cardholder name and address	Adequacy Decision
MeaWallet AS (NO)	Card tokenization and provisioning for mobile wallets	Card data, mobile device data and card transaction data on the cardholder	
Paytrail Oy (FI)	Online banking e-payments acquiring as a payment facilitator	Transaction and payment data	
Tag Systems (PL)	Card bureau for personalizing and issuing customer debit/credit cards	Cardholder name, address	
Thames Card Technology Ltd (UK)	Card bureau for personalizing and issuing customer debit/credit cards	Cardholder name, company name, PAN number, security code, contact information	Adequacy Decision

2. Auditing

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
ECOVIS ProventusLaw (LT)	Independent AML/KYC control testing and compliance auditing	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.	
KPMG Helsinki Oy (FI)	Statutory financial audit of corporate accounts	Partner names, account numbers, transaction information	

3. Customer Service Outsourcing

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Heimo Community Oy (FI)	Holvi Community discussion forum hosting	Full name, email	
Hotjar Ltd (MT)	Surveys and session recording	Email, survey responses, session recordings, heatmaps	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
HubSpot, Inc. (US)	Service and marketing messages, direct marketing campaign assistance and analysis, and administration of data from piloting customers	Full name, contact information, avatar image, IP address	European Commission Model Contract (Standard Contractual Clauses)
IRO Research Oy (FI)	Customer interviews for product research	Full name, email, phone number	
Solvemate GmbH (DE)	Chatbot on the customer support chat	Information received from the data subject (contents of the chat messages)	
SurveyMonkey Inc. (US)	Surveys	Email, survey responses	European Commission Model Contract (Standard Contractual Clauses)
Zendesk, Inc (US)	Customer support via email or phone, including AI-assisted email automation	Full name, contact information	Binding Corporate Rules ("BCRs")

4. Identity and Fraud Agencies

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Arena Interactive (FI)	SMS/OTP delivery for strong customer authentication	Customer phone number	
Compass-Verlag GmbH (AT)	Business identity and credit checks	Name, business name	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Comply Advantage (UK)	Monitoring, PEP, sanctions, and adverse media checks and analysis	Full name, transaction data	Adequacy decision
CRIF Bürger GmbH (DE)	Identity verification and checks for the prevention and detection of crime including fraud and/or money laundering	Name, address, date of birth and telephone number	
Fusionbase GmbH (DE)	Business registry lookups for verification checks	Business registration data, name, address	
IDnow GmbH (DE)	Identity verification, including eID verification, and checks for the prevention and detection of financial crime via video based authentication services	Name, address, phone number, proof of identity, location	
PRH/Virre (FI)	Business registry lookups for verification checks	Business name, registration number, company officer details	
SCHUFA Holding AG (DE)	Business information for risk assessment and compliance with anti-money laundering requirements and credit data for natural persons	Company registration number, name and address of business, name, address, date of birth of directors	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Signicat AS (NO)	Electronic identification of Finnish customers	Name, national ID	
Suomen Asiakastieto Oy (FI)	Identification and credit data for natural and legal persons in Finland, and company profile enrichment	Name, date of birth, residential address, nationality and company financials	
Transactionlink (PL)	Onboarding and verification interface for customer onboarding	Applicant identity data	
YTJ (FI)	Business registry lookups for verification checks	Business name, registration number, company details	

5. Commercial Partners

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Apix Messaging Oy (FI)	Invoice digitisation enablement	Full name, contact information, financial information	
Azets Insight Oy (FI)	Accounting services for customers	Contact information, financial information, identification information	
Basware Oy (FI)	Invoice creation enablement	Full name, email, postal address, phone number	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
DG Ezy Oy (FI)	Accounting services for customers	Contact information, financial information, identification information	
Kitsas (FI)	Accounting integration	Transactions, counterparty details, business ID	
lemon.markets brokerage GmbH (DE)	Investment services for customers	Contact information, financial information, identification information, verification information	
Lexoffice (Haufe-Lexware GmbH) (DE)	Accounting integration	Transactions, counterparty names, IBANs, tax data	
MAESN (DE)	German accounting connections provisioning	Customer transaction, VAT, and receipt data	
Salaxy (FI)	Invoice management	Invoice data, owner ID, tax ID, IBAN	
Tilitoimisto Lemon Tree Oy (FI)	Accounting services for customers	Contact information, financial information, identification information	

6. Marketing

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Everflow (US)	Tracking, management, and payment of partners and affiliates within online marketing and partnership programs	Email address	European Commission Model Contract (Standard Contractual Clauses)
Facebook Inc (US), Facebook Ireland Limited (IE), Facebook Business Manager (SE)	Prospecting and retargeting campaigns for personalised advertising, customer acquisition and lead generation	Encrypted email address, full name, country of Holvi users, advertising/mobile advertiser ID, device ID, IP address, and cookie-based anonymous IDs	European Commission Model Contract (Standard Contractual Clauses)
FinanceAds (DE)	Affiliate marketing tracking	Tracking UUID, campaign user ID, conversion events	
Google Ads, Google Play Store (US)	Prospecting and retargeting campaigns for personalised advertising, customer acquisition and lead generation	Encrypted email address, full name, country of Holvi users, advertising/mobile advertiser ID, device ID, IP address, and cookie-based anonymous IDs	European Commission Model Contract (Standard Contractual Clauses)
Microsoft Deutschland GmbH (DE)	Prospecting and retargeting campaigns for personalised advertising, customer	Encrypted email address, full name, country of Holvi users, advertising/mobile advertiser ID, device	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
	acquisition and lead generation	ID, IP address, and cookie-based anonymous IDs	
Reddit (US)	Prospecting and retargeting campaigns for personalised advertising, customer acquisition and lead generation	Encrypted email address, full name, country of Holvi users, advertising/mobile advertiser ID, device ID, IP address, and cookie-based anonymous IDs	European Commission Model Contract (Standard Contractual Clauses)
Stape.io (US)	Website analytics tracking	Website visitor IP address and other online identifiers	European Commission Model Contract (Standard Contractual Clauses)
TikTok (IE)	Prospecting and retargeting campaigns for personalised advertising, customer acquisition and lead generation	Encrypted email address, full name, country of Holvi users, advertising/mobile advertiser ID, device ID, IP address, and cookie-based anonymous IDs	
Twilio Inc. (US)	IVR / voice services	Phone number and call scripts	European Commission Model Contract (Standard Contractual Clauses)
Twilio Segment (US)	Customer data platform capturing customer/visitor behavioral and tracking events	Behavioral and tracking event data associated with customer/visitor use	European Commission Model Contract (Standard Contractual Clauses)

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
		of Holvi digital properties	
Vainu (FI)	Prospect and customer contact data enrichment	Contact information	

7. Operational Services

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Adobe Systems Inc. (US)	Agreement signing	Full name, email address	European Commission Model Contract (Standard Contractual Clauses)
Apple Inc. (US)	Push notification delivery (APNs)	Device token, notification content	European Commission Model Contract (Standard Contractual Clauses)
Auth0 (Okta, Inc.) (US)	Authentication and login infrastructure	Email, user ID, login metadata (IP, device)	European Commission Model Contract (Standard Contractual Clauses)
DataDog Inc. (US)	Monitoring of cloud-scale applications	Contact information, browsing information, PII	European Commission Model Contract (Standard Contractual Clauses)
Dropbox, Inc. (US)	File storage	Stored files (may contain PII), file metadata	European Commission Model Contract (Standard Contractual Clauses)

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
E-Fax Inc. (j2 Global, Inc) (US)	Receiving and sending of faxes	Fax number	European Commission Model Contract (Standard Contractual Clauses)
Functional Software Inc. (Sentry) (US)	Real-time monitoring and fixing of crashes	IP address	European Commission Model Contract (Standard Contractual Clauses)
Google, LLC (US), Amazon Web Services Inc. (US)	Cloud-based hosting, storage and processing services to assist and/or enable management of users' account information and data generated through their use of Holvi, delivery, analysis and improvement of Holvi Services, and log monitoring, storage, and access	All account information, data generated through the use, and/or necessary for the provision of Holvi Services	European Commission Model Contract (Standard Contractual Clauses)
Lovable Technologies Inc. (US)	AI-assisted web application development and hosting platform used to build and run internal Holvi tools	Depending on the application: full name, email address, phone number, business ID, company name, contact address, accounting software credentials, financial statement data, IP address, and browser metadata.	European Commission Model Contract (Standard Contractual Clauses)
Magic Cloud (FI)	Secure messaging service	Name, email	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Mailgun (US)	Customer-facing transactional email delivery, including forwarded receipts/invoices	Customer email address, financial data contained in receipts/invoices	European Commission Model Contract (Standard Contractual Clauses)
Microsoft Corporation (US)	Artificial intelligence services assisting and enhancing the provision of the Holvi account	Personal data generated through the use of and/or necessary for the provision of Holvi Services	European Commission Model Contract (Standard Contractual Clauses)
mtCaptcha (US)	Bot detection	IP address, browser fingerprint, interaction patterns	
Nexmo (Vonage Limited) (US)	SMS delivery to customers	Phone number	European Commission Model Contract (Standard Contractual Clauses)
OneTrust LLC (US)	Responding to data subject right requests and data subject control over the cookies placed on their browser	Full name, email address, country, IP address	European Commission Model Contract (Standard Contractual Clauses)
REISSWOLF (AT)	Scanning of incoming post	Customer and regulatory correspondence contents	
Senzum AB (SE)	Support and management of customer relationships	Information received from the data subject (contents of the calls and chat messages)	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
Supabase Inc. (US)	Cloud-hosted PostgreSQL database, authentication, edge-function runtime (Deno), and file storage services underpinning the Holvi Lovable applications	Depending on the application: full name, email address, phone number, business ID, company name and address, contact details, accounting software credentials, financial statement data, IP address, application session data, and audit log events	European Commission Model Contract (Standard Contractual Clauses)
Taktile GmbH (DE)	Support for credit underwriting decisioning processes	Business ID	
Teamtailor AB (SE)	Recruitment	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	

Party name and jurisdiction	Purpose	Data disclosed	Safeguards when transferring data to 3rd countries
		the applicant is already a Holvi user	
Typeform SL (ES)	Research platform	Contact information, demographics	
Usercentrics A/S (DK)	AI gateway interface for AI agents and internal systems	Personal data, financial data, and potentially special-category data transiting via connected systems,	