

Category	Party Name and Jurisdiction	Purpose	Data Disclosed	Adequate safeguards when transferring data to 3rd countries
1. Payment Processors				
	Bank of Lithuania payment system CENTROLink	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	
	Thames Card Technology Ltd (UK)	Card bureau	Cardholder name, company name, PAN number, security code, contact information	
	Global Processing Services Ltd (UK)	Processing of Mastercard payment transaction	Cardholder name and address	
	Paytrail Oy (FI)	Online banking e-payments acquiring as a payment facilitator	Transaction and payment data	
	Emerchantpay Ltd (UK)	Card payments acquiring for webshop	Transaction and payment data	
	MeaWallet AS (NO)	Enabling digital payments	Card data, mobile device data and card transaction data on the cardholder	
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.	

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	ECOVIS ProventusLaw (LT)	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 has obtained regulatory authorization of its controller and processor Binding Corporate Rules ("BCRs") for its customers' data
	Solvemate GmbH (DE)	To provide a chatbot on the customer support chat	Information received from the data subject (contents of the chat messages)	
	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	European Commission Model Contract (Standard Contractual Clauses)
	Heimo Community Oy (FI)	Holvi Community discussion forum	Full name, email	
	IRO Research Oy (FI)	To develop Holvi product in line with customer interviews in Finland	Full name, email, phone number	

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4. Identity and Fraud Agencies				
	Comply Advantage (UK)	Monitoring, PEP, sanctions and adverse media checks, analysis	Full name, transaction data	Adequacy decision
	IDnow GmbH (DE)	Video based authentication service. To verify identity and carry out checks for the prevention and detection of financial crime	Name, address, phone number, proof of identity, location	
	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	
	SCHUFA Holding AG (DE)	To receive business information for risk assessment, and compliance with anti-money laundering requirements, such as establishing the corporate structure and beneficial ownership, get credit data for natural persons	Company registration number, name and address of business, name, address, date of birth of directors	
	Suomen Asiakastieto Oy (FI)	To identify and get credit data for natural and legal persons in Finland	Name, date of birth	
	Signicat AS (NO)	Electronic identification of Finnish customers	Name, national ID	
5. Commercial Partners				

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	Basware Oy (FI)	To enable creating invoices	Full name, email, postal address, phone number	
	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, identification 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	European Commission Model Contract (Standard Contractual Clauses)
	Google Ads, Google PlayStore (US)	To execute retargeting campaigns in order to deliver personalised advertising, to provide Holvi app	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 or similar technologies embedded in webpages, ads and emails delivered to users. Mobile advertiser ID, IP Address and other metadata	European Commission Model Contract (Standard Contractual Clauses)

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	Apple AppStore Ads, Apple store (US)	To execute marketing campaigns in order to deliver personalised advertising, to provide Holvi app	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 or similar technologies embedded in webpages, ads and emails delivered to users. Mobile advertiser ID, IP Address and other metadata	European Commission Model Contract (Standard Contractual Clauses)
	Hotjar Ltd. (Malta)	To analyse and understand website visitor behavior	Email address	
	Looker Data Sciences, Inc. (US)	To analyse and process data	User ID, financial data, demographics, device information, location information	European Commission Model Contract (Standard Contractual Clauses)
	Adjust GmbH (DE)	For mobile marketing insights	Location information, IP address, MAC address, device information, device and web activity	

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	Segment.io Inc. (US)	To understand customer behaviour for buiding a better product, providing better customer services and preventing fraud	Email address	European Commission Model Contract (Standard Contractual Clauses)
	Fivetran, Inc. (US)	To connect customer data for analysis purposes	Customer number, profile, contact info, gender, age	European Commission Model Contract (Standard Contractual Clauses)
	UserTesting, Inc. (US)	Remote usability testing tools for product design improvement.	Name, contact information	European Commission Model Contract (Standard Contractual Clauses)
	Taboola Inc. (US)	Advertising platform	User's device and operating system, IP address, the web pages accessed by Users within our Customers' websites, the link that led a User to a Customer's website, the dates and times a User accesses a Customers' website, event information (e.g., system crashes), general location information (e.g., city and state), hashed email addresses (when made available by the User), and gender (when made available by the User)	European Commission Model Contract (Standard Contractual Clauses)
	ReadPeak (FI)	Advertising platform	Name, IP address, customer number, browser type	

7. Operational Services

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	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	European Commission Model Contract (Standard Contractual Clauses)
	Adobe Systems Inc. (US)	To sign agreements	Full name, email address	European Commission Model Contract (Standard Contractual Clauses)
	Google, LLC (US), Amazon Web Services Inc. (US)	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	European Commission Model Contract (Standard Contractual Clauses)

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	Functional Software Inc. (Sentry) (US)	To monitor and fix crashes in real time	IP address	European Commission Model Contract (Standard Contractual Clauses)
	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	European Commission Model Contract (Standard Contractual Clauses)
	DataDog Inc. (US)	To monitor cloud-scale applications	Contact information, browsing information, PII	European Commission Model Contract (Standard Contractual Clauses)
	Nexmo (Vonage Limited) (US)	To send SMS to customers	Phone number	European Commission Model Contract (Standard Contractual Clauses)
	E-Fax Inc. (j2 Global, Inc) (US)	Enabling to receive and send faxes	Fax number	European Commission Model Contract (Standard Contractual Clauses)

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	Magic Cloud (FI)	Secure messaging service	Name, email	
	Typeform SL (ES)	Research platform	Contact information, demographics,	