

Category	Party Name and Jurisdiction	Purpose	Data Disclosed	Adequate safeguards when transferring data to 3rd countries
<b>1. Payment Processors</b>				
	Aktia Bank Oyj (FI), Danske Bank A/S Finland branch (FI), Helsingin Seudun Osuuspankki (FI), Nooa Säästöpankki Oy (FI), Nordea Oyj (FI), S-Pankki Oy (FI), Svenska Handelsbanken AB (publ) Finland branch (FI), Skandinaviska Enskilda Banken AB (SE)	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	name of the cardholder in a payment card transaction.	
	Wirecard Card Solutions Ltd (UK)	Card issuing	Cardholder name and 4 last digits of the card.	
	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	
<b>2. Audit</b>				
	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.	
<b>3. Customer Service Outsourcing</b>				
	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	Zoom Video Communications, Inc. (US)	To organise webinars for customers	full name, email	European Commission Model Contract
	LogMeIn, Inc. (GoToWebinar) (US)	To organise webinars for customers	full name, email	LogMeIn Incorporated provides adequate data protection under the EU-US privacy shield <a href="https://www.">https://www.</a>
	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	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 <a href="https://www.">https://www.</a>
	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 <a href="https://www.">https://www.</a>
	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	

	Braze, Inc. (US)	To manage customer relationships	contact information, Holvi customer number, device information, event information	European Commission Model Contract
<b>4. Identity and Fraud Agencies</b>				
	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.	name, address, phone number, proof of identity	
	CRIF Bürger 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 <a href="https://www.cifas.org.uk/faq">https://www.cifas.org.uk/faq</a>	
	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.	

	Suomen Asiakastieto Oy (FI)	To identify and get credit data for natural and legal persons in Finland.	name, date of birth	
	Signicat (NO)	Electronic identification of Finnish customers	name, national ID	
	Karniboo Technologies Limited (ClickCease) (IS)	Ad fraud prevention tool	IP address, device information, browser locale, the general geographics, a unique identifier, session duration, and interactions and user-interface clicks on ad(s) and webpage(s)	
<b>5. Commercial Partners</b>				
	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 <a href="https://www.automattic.com/privacy/">https://www.automattic.com/privacy/</a>
	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	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	
	fino run GmbH (DE)	To provide help with account switching services	full name, DOB, contact info, Holvi IBAN, total list of Holvi account holders, signature, name and account number of previous bank account	
	Positron Technologies Ltd (TaxScouts) (UK)	To provide tax assessment services 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.	Facebook Inc. provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a> .
	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	Google provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a> .
	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	Apple Inc. provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a> .
	Adroll (US)	To execute retargeting campaigns in order to deliver personalised advertising.	IP address, geo coordinates, referrer, user agent details, timestamp	European Commission Model Contract
	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	Looker Data Sciences, Inc provides adequate data protection under the EU-US privacy shield <a href="https://www.">https://www.</a>
	Adjust GmbH (DE)	For mobile marketing insights	location information, IP address, MAC address, device information, device and web activity	
	Segment.io Inc. (US)	To understand customer behaviour for building a better product, providing better customer services and	email address	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
	Tune, Inc. (US)	To maintain an affiliate program	name, contact information, ad Identifiers, IP address, cookies, pixel tags, location	Tune, Inc provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov.">https://www.privacyshield.gov.</a>
	Fivetran, Inc. (US)	To connect customer data for analysis purposes	customer number, profile, contact info, gender, age	Fivetran, Inc. provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov.">https://www.privacyshield.gov.</a>
	UserTesting, Inc. (US)	Remote usability testing tools for product design improvement.	name, contact information	UserTesting, Inc. provides adequate data protection under the EU-US privacy shield <a href="https://www.">https://www.</a>
	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).	Standard Contractual Clauses

	Outbrain Inc. (US)	Advertising platform	Identifiers, online Identifiers, geolocation data, inferences, internet or network information	Outbrain provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a> .
	ReadPeak (FI)	Advertising platform	name, IP address, customer number, browser type	
<b>7. Operational Services</b>				
	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 Inc. (US)	To sign agreements	full name, email address	Adobe Systems Incorporated provides adequate data protection under the EU-US privacy shield <a href="https://www">https://www</a> .

	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 the use of	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	OneTrust LLC (US)	Respond to data subject right requests, give data subjects a control over the cookies placed on their	full name, email address, country, IP address	OneTrust, LLC provides adequate data protection under the EU-US privacy shield <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	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 <a href="https://www.privacyshield.gov">https://www.privacyshield.gov</a>
	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
	Trint Ltd. (UK)	Automated transcript services	interview audio	
	Magic Cloud (FI)	Secure messaging service	name, email	
	Typeform SL (ES)	Research platform	contact information, demographics,	