

KYC360 Subprocessor List and International Transfers
(effective as of 15-05-25)

Name	Registered office	Service delivery location	KYC360 services	Nature of processing	Personal data processed or transferred	Transfer mechanism
ONBOARDING (via portal: Batch.kyc360.com)						
ID-Pal Limited	145 Pearse Street, Dublin 2, Dublin D02 CP08, Ireland	EEA	Onboarding/eIDV/eVOA	eIDV and eVOA services to the KYC360 platform	Includes: name, address, DOB, gender, nationality, biometric data, identity document images (e.g. passport, driving licence), proof of address	N/A
Refinitiv Limited (London Stock Exchange Group)	Five Canada Square, Canary Wharf, London E14 5AQ	UK/EEA	Onboarding/eVOA	Electronic Verification of Address (eVOA) services used directly by KYC360 and ID-Pal via the KYC360 platform (formerly known as GDC)	Name, address, DOB (used to identify that someone is known at an address)	Adequacy Decision for UK EEA is N/A
Sayari Labs, Inc	829 7 th Street NW, Washington DC 20001, USA	USA	Onboarding/KYB	Provides corporate data lookup services (KYB) to the KYC360 platform	Data about companies Personal data about directors/officers	SCCs
RISKSCREEN (via portal: search.riskscreen.com)						
Amazon Web Services EMEA SARL	38 Avenue John F. Kennedy, Luxembourg 1855, Luxembourg	EEA	RiskScreen	Provides hosting and backup for search.riskscreen.com	All data collected when using search.riskscreen.com	N/A
INFRASTRUCTURE / SUPPORT / IMPLEMENTATION (applicable to all services)						
Microsoft Ireland Operations Limited	70 Sir John Rogerson's Quay, Dublin D02 R296, Ireland	EEA	All KYC360 services (i.e. Onboarding Batch screening; Adverse Media; and RiskScreen)	KYC360 services are hosted on the Microsoft Azure platform (based in France)	All data relating to each of the KYC360 services (as described above)	N/A
Microsoft Ireland Operations Limited	70 Sir John Rogerson's Quay, Dublin D02 R296, Ireland	EEA	All KYC360 services (i.e. Onboarding; Batch screening; Adverse Media; and RiskScreen)	Microsoft Office 365 (including Exchange Online, Teams, OneDrive, SharePoint and Viva Connections) are used for data processing, document storage, electronic messaging and communications	Any data the customer chooses to upload onto SharePoint and/or provide to KYC360 by email. Data may relate to the services, administration or other matters as determined by customer.	N/A

KYC Global Technologies (UK) Limited	Harwood House, 43 Harwood Road, London, SW6 4QP, UK	UK	Support and implementation services	Provides implementation and support services to users of the KYC360 services	Contact details for the person logging the support request (e.g. name, company, location, issue raised, email, contact details)	Adequacy decision
HubSpot Ireland Ltd	Ground Floor, Two Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland	EEA	Support services	Portal for customers to log support requests with KYC360		N/A
Atlassian Pty Ltd	Level 6, 341 George Street, Sydney, NSW 2000, Australia	UK	Support services	Ticketing system supporting HubSpot used by KYC360 support team to raise support tickets on the Jira board and bug tracking. Includes Jira and Confluence products		Adequacy decision
SmartSheet, Inc	69 Old Broad Street, Floor 1, London EC2M 1QS, UK	EU (data residency & backup) USA (ancillary support)	Support services	Collaboration platform to facilitate implementations with customers and enable communications between customers and KYC360		EU-US Data Privacy Framework
Tommy McLean	54 Windfield Gardens, Clybaun Road, Knocknacarra, Galway H91Y 8RY	Ireland	Support and implementation services	Provides implementation and support services		N/A