

oikon LAW



List of (sub) processors, recipients in third countries and international organizations (Compliance with GDPR and UK-GDPR)

This document lists all of the (sub) processors we use, as well as the recipients in third countries and international organizations to which we transfer personal data. It is intended to (1) enable our business partners to identify processors and recipients in third countries and international organizations that we use or have approved, and (2) enable data subjects to know and enforce the rights to which they are entitled. For the sake of transparency, we point out that the companies we named may process personal data at third parties (e.g. external hosting of websites or SaaS applications). Information on data processing by these companies can be found on the respective website that we indicated.

 Company name: Link to website: Service or transmission details: Country of processing: Subject matter of (sub-) processing: 		Comply Advantage https://complyadvantage.com/ AML & Sanctions Compliance Ireland, UK, Belgium, Germany, the Netherlands Anti-Money Laundering and sanctions compliance services		
6. Nature of (sub-) processing: ☑ Collection □ Adaptation □ Restriction ☑ Recording □ Dissemination ☑ Erasure ☑ Retrieval ☑ Otherwise mail □ Structuring □ Consultation ☑ Storage ☑ Use		□ Disclosure by transmission ☑ Alteration □ Organisation ≤ Destruction □ Alignment □ Combination		
 7. Duration of (sub-) processing: 8. Concluded contract or appropriate safeguards ad Processor contract according to Art. 28 GDF SCCs 2021/915 BETWEEN CONTROLLERS AN SCCs 2021/914 MODULE ONE: Transfer Cont SCCs 2021/914 MODULE TWO: Transfer Cont SCCs 2021/914 MODULE THREE: Transfer Pro SCCs 2021/914 MODULE FOUR: Transfer Pro SCCs 2021/914 MODULE FOUR: Transfer Pro International Data Transfer Addendum to for International Data Transfers (United Kingd) 		E Long-term pro ccording to Art. 4 PR/UK-GDPR with ND PROCESSORS troller to Controlle troller to Processo ocessor to Processo ocessor to Controll ited Kingdom) the European Co	i individual contractual terms. r ir sor er	







1. Company name:		Wow 24-7 Inc.			
2. Link to website:		https://wow24-7.io/			
3. Service or transmission details:			ation, KYC and AML checks		
4. Country of processing:			Ukraine, USA, Germany		
5. Subject matter of (sub-) proces	sing:	Identity verifica Laundering che	ation, Know Your Customer and Anti-Money ecks		
6. Nature of (sub-) processing:					
🗵 Collection	Adaptation		Disclosure by transmission		
Restriction	🗵 Recording		□ Alteration		
Dissemination	⊠ Erasure		Organisation		
🗵 Retrieval	🗵 Otherwise ma	king available	⊠ Destruction		
Structuring	Consultation	5	Alignment		
⊠ Storage	⊠ Use				
7. Duration of (sub-) processing:			processing or intermediate storage. rocessing for the duration of the contract.		
 □ SCCs 2021/915 BETWEEN □ SCCs 2021/914 MODULE □ International Data Transf 	CONTROLLERS A ONE: Transfer Cont IWO: Transfer Con IHREE: Transfer Pr FOUR: Transfer Prc fer Agreement (Un sfer Addendum to	ND PROCESSOR troller to Controll troller to Process ocessor to Proce ocessor to Contro ited Kingdom) the European C	er or ssor		
1. Company name:	Freshwo	orks Gmbh			
2. Link to website:	<u>https://v</u>	<u>vww.freshworks.</u>	/ww.freshworks.com/		
3. Service or transmission details:		er Support			
4. Country of processing:	Germar	ny, USA, India, Un	ited Kingdom, France, the Netherlands		
5. Subject matter of (sub-) proces	sing:	Customer Supp	port Services		
6. Nature of (sub-) processing:					
☑ Collection	Adaptation		Disclosure by transmission		
Restriction	Recording		□ Alteration		
Dissemination	Erasure		Organisation		
🗆 Retrieval	🗵 Otherwise ma	king available	Destruction		
Structuring	Consultation		🗆 Alignment		
🗵 Storage	🗵 Use		Combination		
7. Duration of (sub-) processing:			processing or intermediate storage. rocessing for the duration of the contract.		
 8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR: Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms. SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS SCCs 2021/914 MODULE ONE: Transfer Controller to Controller SCCs 2021/914 MODULE TWO: Transfer Controller to Processor SCCs 2021/914 MODULE THREE: Transfer Processor to Processor SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller International Data Transfer Agreement (United Kingdom) International Data Transfer Addendum to the European Commission's Standard Contractual Clauses for International Data Transfers (United Kingdom) 					

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 2. Link to website: 3. Service or transmission details: 		Twilio Inc https://www.twilio.com/ Cloud and Authentication USA		
5. Subject matter of (sub-) process	sing:		d communicating services, 2 Factor ervice (SMS and video infrastructure)	
 6. Nature of (sub-) processing: Collection Restriction Dissemination Retrieval Structuring Storage 	 □ Adaptation □ Recording ∞ Erasure ∞ Otherwise mal □ Consultation ∞ Use 	king available	 Disclosure by transmission Alteration Organisation Destruction Alignment Combination 	
7. Duration of (sub-) processing:			ocessing or intermediate storage. ocessing for the duration of the contract.	
 8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR: Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms. SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS SCCs 2021/914 MODULE ONE: Transfer Controller to Controller SCCs 2021/914 MODULE TWO: Transfer Controller to Processor SCCs 2021/914 MODULE THREE: Transfer Processor to Processor SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller International Data Transfer Agreement (United Kingdom) International Data Transfer (United Kingdom) 				
1. Company name: 2. Link to website: 3. Service or transmission details: 4. Country of processing:		Sendgrid, Inc. https://sendgrid.c Email delivery, m USA	com/ nanagement and analytics	
5. Subject matter of (sub-) process	sing:		nsactional and marketing email delivery, Id analytics services	
 6. Nature of (sub-) processing: Collection Restriction Dissemination Retrieval Structuring Storage 	 □ Adaptation □ Recording ∞ Erasure ∞ Otherwise mal □ Consultation ∞ Use 	king available	 Disclosure by transmission Alteration Organisation Destruction Alignment Combination 	
7. Duration of (sub-) processing:			ocessing or intermediate storage. ocessing for the duration of the contract.	
 8. Concluded contract or appropri Processor contract accord SCCs 2021/915 BETWEEN SCCs 2021/914 MODULE C SCCs 2021/914 MODULE T SCCs 2021/914 MODULE T SCCs 2021/914 MODULE T SCCs 2021/914 MODULE F International Data Transference 	ding to Art. 28 GDF CONTROLLERS AN DNE: Transfer Cont WO: Transfer Cont 'HREE: Transfer Pro COUR: Transfer Pro	PR/UK-GDPR with ND PROCESSORS roller to Controller troller to Processor ocessor to Processo cessor to Controlle	individual contractual terms. r r sor	

for International Data Transfers (United Kingdom)

Company name:
 Link to website:

Google Germany GmbH <u>https://cloud.google.com/</u>

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Approved by: Ulrich Baumann. Template-Date: 2022-11-04







 Service or transmission details: Country of processing: 		Cloud provider Germany		
5. Subject matter of (sub-) proces	sing:	Cloud provider		
6. Nature of (sub-) processing: ☑ Collection □ Restriction □ Dissemination □ Retrieval □ Structuring ☑ Storage	 Adaptation Recording Erasure Otherwise mail Consultation Use 	king available	 Disclosure by transmission Alteration Organisation Destruction Alignment Combination 	
7. Duration of (sub-) processing:			ocessing or intermediate storage. ocessing for the duration of the contract.	
 8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR: Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms. SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS SCCs 2021/914 MODULE ONE: Transfer Controller to Controller SCCs 2021/914 MODULE TWO: Transfer Controller to Processor SCCs 2021/914 MODULE THREE: Transfer Processor to Processor SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller International Data Transfer Agreement (United Kingdom) International Data Transfers (United Kingdom) 				
1. Company name: 2. Link to website: 3. Service or transmission details: 4. Country of processing:		Amazon Web Ser https://aws.amazo Cloud and API pr Germany	on.com/?nc2=h_lg	
 2. Link to website: 3. Service or transmission details: 		https://aws.amaze Cloud and API pr	on.com/?nc2=h_la ovider	
 2. Link to website: 3. Service or transmission details: 4. Country of processing: 		https://aws.amaze Cloud and API pr Germany Cloud and API pr	on.com/?nc2=h_la ovider	
 2. Link to website: 3. Service or transmission details: 4. Country of processing: 5. Subject matter of (sub-) processing: 6. Nature of (sub-) processing: Collection Restriction Dissemination Retrieval Structuring 	sing: Adaptation Recording Erasure Otherwise mal Consultation	https://aws.amaze Cloud and API pr Germany Cloud and API pr king available	on.com/?nc2=h_lg ovider Disclosure by transmission Alteration Organisation Destruction Alignment	

1. Company name:

- 2. Link to website:
- 3. Service or transmission details:
- 4. Country of processing:

Customer Experience Automation USA, Ireland, Australia

https://www.activecampaign.com/

ActiveCampaign, LLC

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5. Subject matter of (sub-) processing:	Customer Experience Automation
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6. Nature of (sub-) processing:

- ☑ Collection
- □ Restriction
- □ Dissemination
- □ Retrieval
- Structuring
- 🗵 Storage

- □ Recording
- 🗵 Erasure

□ Adaptation

- ☑ Otherwise making available
- □ Consultation
- 🗵 Use
- □ Destruction
 - □ Alignment

□ Alteration

Organisation

□ Combination

7. Duration of (sub-) processing:

□ Short-term processing or intermediate storage. ☑ Long-term processing for the duration of the contract.

Disclosure by transmission

8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR and UK-GDPR:

- I Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms.
 - □ SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS
 - □ SCCs 2021/914 MODULE ONE: Transfer Controller to Controller
 - ☑ SCCs 2021/914 MODULE TWO: Transfer Controller to Processor
 - □ SCCs 2021/914 MODULE THREE: Transfer Processor to Processor
 - □ SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller
 - International Data Transfer Agreement (United Kingdom)

□ International Data Transfer	Addendum to the	European	Commission's Standard	Contractual Cla	uses
for International Data Transfers	(United Kingdom)				

 Company name: Link to website: Service or transmission details: Country of processing: 		Tableau Software <u>https://www.tableau.com/</u> Visualization of data, business forecasts, decision making and strategy building. USA		
5. Subject matter of (sub-) proces	sing:	Visualization of data, business forecasts, decision making and strategy building.		
6. Nature of (sub-) processing: ☑ Collection □ Adaptation □ Restriction □ Recording □ Dissemination □ Erasure □ Retrieval ☑ Otherwise ma ☑ Structuring □ Consultation ☑ Storage ☑ Use 7. Duration of (sub-) processing: 8. Concluded contract or appropriate safeguards a ☑ Processor contract according to Art 28 GD		 Alignment Combination Short-term processing or intermediate storage. Long-term processing for the duration of the contract 		
 SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS SCCs 2021/914 MODULE ONE: Transfer Controller to Controller SCCs 2021/914 MODULE TWO: Transfer Controller to Processor SCCs 2021/914 MODULE THREE: Transfer Processor to Processor SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller International Data Transfer Agreement (United Kingdom) International Data Transfer Addendum to the European Commission's Standard Contractual Clause for International Data Transfers (United Kingdom) 				

1. Company name:

- 2. Link to website:
- 3. Service or transmission details:
- 4. Country of processing:
- 5. Subject matter of (sub-) processing:

Talend S.A (Stitchdata) https://www.stitchdata.com/ Data Extract, Transform, Load (ETL) Service and related USA Data extraction and channeling between CRM and Business Forecasting tools

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Classification: Public

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6.	Nature	of ((sub-)	processing:
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- I Collection
- □ Restriction
- □ Dissemination
- □ Retrieval
- IN Structuring
- 🗵 Storage

- □ Adaptation □ Recording
- 🗵 Erasure
- I Otherwise making available
- □ Consultation 🗵 Use
- □ Alignment □ Combination

□ Alteration

☑ Organisation

□ Destruction

7. Duration of (sub-) processing:

□ Short-term processing or intermediate storage. ☑ Long-term processing for the duration of the contract.

Disclosure by transmission

8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR and UK-GDPR:

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 - ☑ SCCs 2021/914 MODULE TWO: Transfer Controller to Processor
 - □ SCCs 2021/914 MODULE THREE: Transfer Processor to Processor
 - □ SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller
 - □ International Data Transfer Agreement (United Kingdom)
 - International Data Transfer Addendum to the European Commission's Standard Contractual Clauses
 - for International Data Transfers (United Kingdom)
- 1. Company name:
- 2. Link to website:
- 3. Service or transmission details:
- 4. Country of processing:

5. Subject matter of (sub-) processing:

6. Nature of (sub-) processing:

- ☑ Collection
- Restriction □ Dissemination
- 🗵 Retrieval
- □ Structuring
- ⊠ Storage

□ Adaptation □ Disclosure by transmission ⊠ Recording ☑ Alteration ⊠ Erasure

Crystal Blockchain B.V.

https://crystalblockchain.com/

AML & Sanctions Compliance

Kingdom, and United States

Cryptocurrency Wallet AML screening

- □ Organisation
- ☑ Destruction

the Netherlands, Germany, Ireland, Ukraine, United

- □ Alignment □ Combination

7. Duration of (sub-) processing:

□ Short-term processing or intermediate storage. ☑ Long-term processing for the duration of the contract.

8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR and UK-GDPR:

□ Consultation

□ Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms.

☑ Otherwise making available

□ SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS

- □ SCCs 2021/914 MODULE ONE: Transfer Controller to Controller
- ☑ SCCs 2021/914 MODULE TWO: Transfer Controller to Processor
- □ SCCs 2021/914 MODULE THREE: Transfer Processor to Processor
- □ SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller
- International Data Transfer Agreement (United Kingdom)

🗆 International Data Transfer Addendum to the European Commission's Standard Contractual Clauses for International Data Transfers (United Kingdom)

I. Company name: 2. Link to website: 3. Service or transmission details:	LUKKa, Inc. (Colnfirm) https://www.coinfirm.com/ AML & Sanctions Compliance Poland, Switzerland, United Kingdom, United States			
4. Country of processing:				
5. Subject matter of (sub-) proces	Sing: Cryptocurrency Wallet AML screening			ning
6. Nature of (sub-) processing:				
🗵 Collection	Adaptation		🗆 Disclosure by	y transmission
Restriction	🗵 Recording		Alteration	
Dissemination	🗵 Erasure		Organisation	1
🗵 Retrieval	🗵 Otherwise ma	aking available	Destruction	
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□ Structuring ⊠ Storage □ Consultation ☑ Use □ Alignment □ Combination

7. Duration of (sub-) processing:

Short-term processing or intermediate storage.
 Long-term processing for the duration of the contract.

8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR and UK-GDPR:

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 - □ SCCs 2021/914 MODULE THREE: Transfer Processor to Processor
 - □ SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller
 - 🗵 International Data Transfer Agreement (United Kingdom)
 - □ International Data Transfer Addendum to the European Commission's Standard Contractual Clauses for International Data Transfers (United Kingdom)

Cookie3 OÜ

https://www.cookie3.co/

Estonia, and other EEA countries

Website analytics

- Company name:
 Link to website:
 Service or transmission details:
- 4. Country of processing:
- 5. Subject matter of (sub-) processing:

6. Nature of (sub-) processing:

 \boxtimes Collection

- Restriction
- □ Dissemination
- 🗵 Retrieval
- □ Structuring
- 🗵 Storage

- □ Adaptation
 ☑ Recording
 ☑ Erasure
 ☑ Otherwise making available
 □ Consultation
 ☑ Use
- Disclosure by transmission
 Alteration
 Organisation
 Destruction
 Alignment
 Combination

Analytics dashboards, CRM, and campaign management

7. Duration of (sub-) processing:

□ Short-term processing or intermediate storage. ☑ Long-term processing for the duration of the contract.

8. Concluded contract or appropriate safeguards according to Art. 44ff GDPR and UK-GDPR:

- □ Processor contract according to Art. 28 GDPR/UK-GDPR with individual contractual terms.
 - ☑ SCCs 2021/915 BETWEEN CONTROLLERS AND PROCESSORS
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 - $\hfill\square$ SCCs 2021/914 MODULE THREE: Transfer Processor to Processor
 - □ SCCs 2021/914 MODULE FOUR: Transfer Processor to Controller
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