

Sub-Processor disclosure statement

Issued Pursuant to the Euronext Corporate Services Group Data Processing Agreement (“DPA”)

Effective Date: May 2025

Issued by: Euronext Corporate Services Group (“ECS Group”, “ECS”, “we”, “us”, or “our”)

Recitals

This Sub-Processor Disclosure Statement (“Statement”) is issued in accordance with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”). It forms an integral component of the ECS Group Data Processing Agreement (“DPA”) and any related contractual frameworks governing the provision of ECS Solutions. ECS Group maintains a strong commitment to the principles of transparency, accountability, and security in all Personal Data processing activities undertaken through its Sub-processors. For the avoidance of doubt, this Statement applies exclusively to Sub-processors engaged by ECS Group in its capacity as a Processor on behalf of its clients. Where ECS Group acts as Controller in its own right — for example, in connection with internal business operations, administration, or reseller activities — the vendors it engages qualify as ECS’s Processors rather than Sub-processors. Such vendors are therefore outside the scope of this Statement and are not included in the Sub-processor overview.

1. Purpose and scope

This Statement outlines the identity, jurisdiction, and functional roles of Sub-processors engaged by ECS Group or its affiliated entities for the purposes of processing Personal Data on behalf of its clients. All Sub-processors are engaged pursuant to written agreements that impose obligations equivalent to or exceeding those contained in the DPA and applicable data protection legislation.

Processing activities may be undertaken by:

- **Intra-group entities** operating under a Binding Intra-Group Agreement (“IGA”); and
- **External third-party providers** engaged in connection with discrete Pass-Through Services or ECS Solution components.

Each Sub-processor is subject to ongoing risk assessments, vendor due diligence, and is required to implement appropriate technical and organisational measures (“TOMs”).

2. Definitions

For the purposes of this Statement:

- **“Personal Data”** has the meaning set forth in the GDPR.
- **“Sub-processor”** means any third party or ECS affiliate engaged in the processing of Personal Data on behalf of ECS Group clients.
- **“Pass-Through Services”** means services delivered by third-party vendors directly supporting ECS Solutions under ECS’s control and supervision.
- **“IGA”** refers to the Binding Intra-Group Agreement among Euronext affiliates governing shared data processing activities.
- **“TOMs”** refers to technical and organisational measures designed to ensure data security and compliance.

3. Intra-Group processing arrangements

3.1 Scope of Processing

The following functional domains may be supported by ECS Group affiliates under the IGA:

- **IT services & security:** Platform development, systems maintenance, vulnerability management, and threat monitoring.
- **Infrastructure management:** Cloud provisioning, hosting services, and business continuity.
- **Client support operations:** Technical support, helpdesk functionality, and interface management.

3.2 Safeguards

All intra-group entities:

- Are contractually bound by the same data protection obligations as ECS Group;
- Operate in accordance with ECS Group’s privacy and security policies, including the ECS Standard;
- Are expressly prohibited from conducting any processing activities beyond those set forth in the DPA or associated Service Agreements.

3.3 Participating intra-group entities

Operational coverage	ECS entity	Processing activities	Jurisdiction

Group-wide	Euronext Corporate Solutions B.V.	IT management, customer support, analytics	Netherlands
Group-wide	Euronext Technologies Unipessoal, LDA	Infrastructure management, security, technical support	Portugal

3.4 Clarification on Sub-Processing

For the purposes of this Statement, intra-group entities operating under the IGA qualify as Sub-processors when engaged in the processing of Personal Data on behalf of ECS Group clients. Such intra-group sub-processing constitutes the primary layer of processing within ECS Group. Where specific functions require further support, these entities may engage additional Sub-processors. Any such engagements shall be subject to prior written agreements imposing data protection, confidentiality, and security obligations that are no less protective than those set out in the DPA and applicable data protection laws.

4. Third-Party Sub-Processors

4.1 iBabs (Board Management Software)

Sub-Processor	Purpose of Processing	Location	Legal Basis	Contractual Safeguards	Transfer Mechanism
CYSO Hosting	Cloud hosting infrastructure	Netherlands (EEA)	Performance of contract	DPA executed	EEA-based processing

4.2 LIABILITYLOG (Compliance Tracking Platform)

Sub-Processor	Purpose of processing	Location	Contractual safeguards	Transfer mechanism
Sinch Sweden AB	SMS delivery for 2FA	Sweden (EEA)	DPA	EEA-based processing

4.3 INSIDERLOG (Insider List Management Tool)

Sub-Processor	Purpose of Processing	Location	Contractual Safeguards	Transfer Mechanism
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Sinch Sweden AB	SMS delivery for 2FA	Sweden (EEA)	DPA	EEA-based processing
One.com Group AB	Hosting, domain and email services	Sweden (EEA)	DPA	EEA

4.4 IR.Manager (Investor Relations Management)

Sub-Processor	Purpose of Processing	Hosting Location	Legal Basis	Contractual Safeguards	Transfer Mechanism
IR Soft	Shareholder data, client communications	AWS (Ireland), Microsoft Azure	Legitimate interest	DPA	EEA

4.5 Engagestream (Intra-Group Only)

Personal Data processed for Engagestream is handled in the first instance by ECS Group affiliates operating under the Binding Intra-Group Agreement (“IGA”). These intra-group entities may act as sub-processors for the purposes of providing infrastructure, support, and security functions. Where applicable, such processing may be supported by additional sub-processors engaged under written agreements that impose obligations equivalent to those in the DPA.

4.6 EuroStockNews (Intra-Group Only)

Personal Data processed for EuroStockNews is handled in the first instance by ECS Group affiliates operating under the Binding Intra-Group Agreement (“IGA”). These intra-group entities may act as sub-processors for the purposes of providing infrastructure, support, and security functions. Where applicable, such processing may be supported by additional sub-processors engaged under written agreements that impose obligations equivalent to those in the DPA.

4.7 LiveEquity (Intra-Group Only)

Personal Data processed for LiveEquity is handled in the first instance by ECS Group affiliates operating under the Binding Intra-Group Agreement (“IGA”). These intra-group entities may act as sub-processors for the purposes of providing infrastructure, support, and security functions. Where applicable, such processing may be supported by additional sub-processors engaged under written agreements that impose obligations equivalent to those in the DPA.

4.8 Shareholder Analysis (Intra-Group Only)

Personal Data processed for Shareholder Analysis is handled in the first instance by ECS Group affiliates operating under the Binding Intra-Group Agreement (“IGA”). These intra-group entities may act as sub-processors for the purposes of providing infrastructure, support, and security functions. Where applicable, such processing may be supported by additional sub-processors engaged under written agreements that impose obligations equivalent to those in the DPA.

5. Pass-Through Service Providers

In the course of delivering ECS Solutions, ECS may engage third-party providers to deliver discrete service components. These providers are contractually integrated under the following principles:

- ECS entities may engage such providers only where permitted under the third-party’s terms;
- The same or equivalent data protection and security measures as required by ECS’s DPA apply; and
- Transfer mechanisms align with GDPR standards, including reliance on adequacy decisions or SCCs, where applicable.

6. Governance, Review, and Reservation of Rights

All Sub-processor engagements are subject to ECS Group’s internal vendor risk management framework, including periodic reassessments and ongoing monitoring. ECS Group reserves the right to amend this Statement as necessary to reflect updates in its processing ecosystem or legal obligations.

7. Contact

Questions regarding this Statement or requests related to data subject rights may be directed to the ECS Group’s Data Protection Officer at:

dpo.ecs@euronext.com

This Statement was last updated in June 2025 and supersedes any prior disclosures.