

## List of Sub-processors

### Common Sub-processors for all Control Risks services

Company Name	Registered Address	Purpose	Processing Location(s)
Technology infrastructure providers	Can vary, depending on provider	To provide our technology infrastructure including provision of data hosting and hosting of back-up data, electronic communications providers, web-based collaboration platforms, and provision of productivity software (e.g., Office 365)	Multiple locations including in-country where geo-location is available and supporting legal requirements in the originating country
ServiceNow	Headquarters 2225 Lawson Lane Santa Clara, CA , 95054	Customer Relationship Manager software	Multiple locations. Data is hosted on cloud servers depending on the region of the originating data (i.e., data originating in the EU is hosted on servers located in the EU)
News aggregators, specialist databases, social media platforms	Can vary, depending on location of the services	Providers of data for the provision of the services	Can vary, depending on location of the services
Any member of the Control Risks Group (defined as any affiliate of the Control Risks group being a company which is under the direct or indirect control of Control Risks International Limited)	Can vary, depending on location of the services	Providers of the services	Can vary, depending on location of the services

### Sub-processors for VANTAGE Platform

Company Name	Registered Address	Purpose	Processing Location(s)
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GAN Integrity, Inc.	345, 7th Ave, New York, NY 10001	Provision of Platform Services and Technical Support in accordance with the agreement	Denmark (main office) and New York (location of additional customer support and technical staff)
GAN Integrity Solutions ApS	Kronprinsessegade 54, 1306 Copenhagen, Denmark	Provision of Platform Services and Technical Support in accordance with the agreement	Denmark (main office) and New York (location of additional customer support and technical staff)

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## GAN Integrity's Sub-processors

Company Name	Registered Address	Purpose	Processing Location(s)
Amazon Web Services EMEA SARL	ATTN: AWS EMEA Legal 38 Avenue John F. Kennedy, L-1855, Luxembourg	Hosting of data	Ireland Germany
Cloudflare, Inc.	101 Townsend St., San Francisco, California 94107	DNS provider	Worldwide
GAN Integrity Solutions ApS *	Kronprinsessegade 54, 1306 Copenhagen, Denmark	Provision of Platform Services and Technical Support in accordance with the Agreement	Denmark
GAN Integrity, Inc.	345, 7th Avenue, New York, NY 10001	Provision of Services	United States (location of additional customer support and technical staff)
Google, LLC	1600 Amphitheatre Parkway Mountain View, California 94043	Records management and text translations	Worldwide
Elasticsearch B.V.	Attn: Privacy Team Keizersgracht 281 1016 ED Amsterdam The Netherlands	Log keeping tool for error monitoring and alert purposes	Ireland Germany
Microsoft Ireland Operations Limited	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland	Transmission of customer files (Outlook)	EU (Email storage) Worldwide (Email transmission)
MongoDB, Inc.	1633 Broadway, 38th Floor New York, NY 10019	Cloud database provider	Ireland Germany
Regulatory DataCorp Limited	16 Lloyd's Avenue London, EC3N 3AX, England	Screening data provider	Worldwide
SendGrid, Inc.	1801 California St, fl 5, Denver, CO 80202, USA	Automated email notifications	United States
Whistleblower Security, Inc.	1455 Bellevue Avenue #300, West Vancouver, B.C., Canada	Telephone intake of whistleblowing reports	Canada
Zendesk, Inc.	11019 Market St San Francisco, CA 94103	Customer-facing support portal	EU, United States

\* Please note that Control Risks has a direct contractual relationship with GAN Integrity Solutions ApS and that, in relation with the Platform Services, affiliates and services providers of GAN Integrity Solutions ApS will be sub sub-processors.

## Sub-processors for VANTAGE Automated Screening and VANTAGE Gateway

Company Name	Registered Address	Purpose	Processing Location(s)
Dun & Bradstreet, Inc.	103 John F Kennedy Parkway, Short Hills, NJ 07078	Database provider to be consulted for the provision of the Services	United States
Lexis Nexis Risk Solutions FL Inc.	1000 Alderman Drive, Alpharetta, Georgia 3000	Database provider to be consulted for the provision of the Services	United States

### Sub-processors for forensic imaging, data collection and eDiscovery services (data filtering, processing, analytics, hosting, production and project management)

Company Name	Registered Address	Purpose	Processing Location(s)
Relativity ODA LLC	231 S LaSalle St, Floor 8, Chicago, IL 60604 USA	SaaS product that provides an application to analyse data together with the environment to host it	Multiple locations

### Sub-processors for software solutions in connection with the Control Risks Security Consulting Services

Company Name	Registered Address	Purpose	Processing Location(s)
Everbridge Inc.	25 Corporate Drive, Burlington, MA 01803.	Provider of the software solutions in connection with the Control Risks Security Consulting Services, including but not limited to Everbridge Mass Notification, Everbridge Crisis Management, COVID-19 Shield, CEM or Critical Event Management, Safety Connection, Visual Command Center or VCC and IT Alerting.	US, UK, Germany

### Sub-processors for protective services and journey management

Company Name	Registered Address	Purpose	Processing Location(s)
Locally licensed logistic support	Can vary, depending on location of the services	Provider of logistic support for the provision of the services	Can vary, depending on location of the services

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## Sub-processors for Control Risks One

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Company Name	Registered Address	Purpose	Processing Location(s)
Seerist Inc.	13221 Woodland Park Rd, Herndon, VA 20171, United States	Provision of Seerist platform	United States
Microsoft Limited	Microsoft Campus, Thames Valley Park, Reading, Berkshire, RG6 1WG, United Kingdom	Provision of D365 for phone recordings and call logs	Multiple locations including in-country where geo-location is available and supporting legal requirements in the originating country.  Servers are based in Netherlands/Ireland for data originating in Europe. Servers are in the United States for data originating in the Americas

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## Version Changes

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DATE OF CHANGE	DESCRIPTION	EFFECTIVE DATE
May 2023	<ul style="list-style-type: none"><li>• Removal of MINTRA</li><li>• Removal of Asia Emergency Assistance Holdings Pte Ltd</li><li>• Addition of ServiceNow as CRM management tool</li><li>• Addition of Atlassian as technology infrastructure</li><li>• Addition of Seerist as sub-processor for Control Risks One services</li><li>• Consolidation of technology infrastructure providers</li></ul>	15 July 2023