

Client Data Sharing Summary

Clearstream Banking S.A. (CBL) is an entity supervised by the Commission de Surveillance du Secteur Financier (CSSF), including supervision on outsourcings and the sharing of Client Data to be in line with applicable laws and regulations. Subject to the terms of the General Terms and Conditions and the conditions of applicable laws and regulations, CBL may share Client Data and outsource tasks. CBL has stringent control mechanisms in place ensuring Client Data is only shared on a “need to know” and “least principle” basis. Affiliates and other third parties who have access to Client Data are either subject by law to professional secrecy or be bound by appropriate confidentiality terms; this includes as well any third party providers of IT platforms or cloud infrastructures regardless of whether or not they may exceptionally have access to Client Data in the scope of support or maintenance activities.

CBL and other Affiliates of Deutsche Börse AG use a common platform tool for the performance of anti-money laundering (AML), countering the financing of terrorism (CTF) and know-your-customer (KYC) duties to ensure regulatory compliance. To the extent the Client is or becomes prospect or client of other Affiliate(s), this platform also provides for specific sharing of Client Data between the relevant entities; such data being limited to the Client’s AML, CTF and KYC data, as required by applicable laws, regulations and internal policies.

While other third-party services providers may be used, CBL mainly delegates tasks and shares Client Data within the internal operating framework of Deutsche Börse Group, and here primarily with

- Clearstream Banking AG (Germany);
- Deutsche Börse AG (Germany);
- Clearstream Australia Limited (Australia);
- Clearstream Fund Centre S.A. (Luxembourg);
- Clearstream Fund Centre S.A., Cork Branch (Ireland);
- Clearstream Fund Centre AG (Switzerland);
- [Clearstream Fund Centre \(Hong Kong\) Limited](#);
- Clearstream Services S.A. (Luxembourg);
- Clearstream Services S.A., Prague Branch (Czech Republic)
- Clearstream Banking S.A., Singapore Branch (Singapore); and
- Clearstream London Ltd, London (UK).

1. Type of Client Data potentially transmitted

Client Data shared by CBL may include, for example, the following:

- Account Details and Account Balances;
- Transaction Data;
- Financial Data;
- Investment Data;
- End-client Data;
- Compliance Data;
- Securities Lending Trade and Reconciliation Data;
- Contact Data; and
- Legal and Business Terms including Rates.

Client Data shared may also include Personal Data as such term is defined in the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC. The processing of Personal Data by CBL is detailed in the “Notice of European Union Data Protection Terms” as separately available on the CBL website, which reads with Art. 63 of the General Terms and Conditions as Governing Document.

2. Relevant services and Country of Establishment of Data Recipient / Services Provider

2.1 Client services

Services		Country of Establishment of Data Recipient / Services Provider
Settlement Services		Czech Republic, Germany, Luxembourg, Singapore
Cash Financing Services	Cash Management	Czech Republic, Singapore
	Cash Financing	Luxembourg, Singapore
	Foreign Exchange	Czech Republic, Germany, Luxembourg, Singapore
Global Securities Financing Services	Collateral Management	Czech Republic, Germany, Luxembourg, Singapore, UK
	Securities Lending	Czech Republic, Germany, Luxembourg, Singapore, UK
Global Issuance Services		Czech Republic, Germany, Luxembourg, Singapore, UK
Asset Servicing	Income Services	Czech Republic, Germany, Luxembourg, Singapore
	Corporate Action Services	Czech Republic, Germany, Luxembourg, Singapore
	Proxy Voting and Disclosure Services	Belgium, Czech Republic, UK
	Tax Services	Czech Republic, Germany, Luxembourg, Singapore
Investment Funds Services	Vestima (including Vestima Prime)	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
	CFF	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
	Distribution Support Services	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK, Hong Kong
Report and Information Services	Reconciliation	Czech Republic, Germany, Ireland, Luxembourg, Singapore
	Monthly Reports	Luxembourg
Connectivity		Czech Republic
Client Relationship Management (including Onboarding and Maintenance, Client Service, Transition Service)		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA
Sales (including potential services by Affiliates)		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA

2.2 Internal functions

Function	Country of Establishment of Data Recipient / Services Provider
IT	Austria, Belgium, Czech Republic, Finland, France, Germany, Ireland, Luxembourg, Netherlands, USA
Regulatory Reporting	UK
Tax	UK, USA
Legal	Germany, Luxembourg, Singapore, Switzerland, USA
Compliance	Czech Republic, Germany, Ireland, Singapore, UK, USA
Treasury	Czech Republic, Germany, Singapore
Data Protection	Germany
Marketing	Germany

The information contained in this Client Data Sharing Summary may be subject to amendment by publication of an updated version of this Client Data Sharing Summary on the CBL website. Such update shall be made available timely in advance of the operational change being implemented.

Terms not defined in this Client Data Sharing Summary shall have the meaning as assigned in the General Terms and Conditions.