

Sub-processors List

To operate our services, InvestRe relies on specialised service providers. Some of these providers process personal data on our behalf and are therefore considered sub-processors within the meaning of the GDPR.

List of sub-processors

Sub-processor	Purpose	Data Location
AWS	Provision of cloud hosting and network infrastructure supporting the operation and security of our systems and services	AWS (Germany)
Amplitude	Provision of product analytics tools to analyse usage of digital products for business analysis, research and service improvement purposes	AWS (Germany)
Apollo (ZenLeads Inc.)	Provision of CRM and sales intelligence tools supporting business development, lead management and prospect research	US
AppsFlyer	Provision of marketing attribution and performance analytics tools to measure and optimise marketing campaigns	Israel
Atlassian	Provision of cloud-based tools for requirements management, documentation management, project management and service desk ticket management	EU (Germany/Ireland)
Okta (Auth0)	Provision of identity and access management services to authenticate users and manage secure access to systems and applications	EU
Arendt Services	Provision of AML/CFT, sanctions screening and client onboarding support services, including customer due diligence and risk assessment	EU / EEA (and, where applicable, United Kingdom)
BDO	Provision of internal audit services, including the review and testing of internal controls, risk management and governance frameworks, with access to relevant personal data for audit and compliance purposes	Luxembourg
Customer.io	Provision of a customer messaging and engagement platform used to send transactional, service-related and marketing communications to users based on predefined rules and events	US

DocSend	Secure document sharing and tracking for internal operational purposes (e.g. sharing documents with prospects, clients or counterparties)	US
Dow Jones – Factiva Limited	Provision of AML, sanctions and adverse media screening tools supporting compliance and risk assessment processes	Risk Database Search - No Subscriber Data is stored (at rest) during the provision of the Service(s) Screening & Monitoring and News Screening: Ireland (primary) and Frankfurt (secondary)
Ewa Fiduciaire	Provision of accounting, payroll and administrative services supporting finance and HR operations	Luxembourg (primary); Netherlands for cloud backup
Finologie	Provision of digital client onboarding and lifecycle management software supporting customer identification and account setup	Luxembourg
KPMG	Provision of audit, tax and advisory services, including access to personal data for regulatory, compliance and governance purposes	EU / EEA
Maquit	ICT Control Function as a Service — ICT regulatory compliance management, outsourcing register, DORA Register of Information, ICT risk management, control planning and monitoring	Ireland/Netherlands
Make	Provision of workflow automation tools supporting internal operational processes	EU
MangoPay	Provision of payment and electronic money services supporting multi-currency wallets and transaction processing	EU
Microsoft	Provision of cloud-based productivity, communication and document management tools supporting internal operations	EU
PWC	Provision of statutory external audit services, including financial and regulatory audits, with access to relevant personal data as required for statutory and regulatory compliance purposes	EU / EEA
RFA	Provision of IT and operational support services, including helpdesk functions	Luxembourg
Typeform	Provision of survey and questionnaire tools supporting feedback collection, research and service improvement	EU

Location of processing and International transfers

The "Data Location" column indicates where personal data is primarily stored at rest. Where a sub-processor's infrastructure is based within the EU/EEA, data at rest remains in the EU/EEA.

However, certain sub-processors may access or process personal data from outside the EU/EEA for operational purposes, including technical support, system administration, or sub-processing by their own service providers. Such access constitutes an international transfer within the meaning of GDPR Chapter V, regardless of where data is stored at rest.

Where such transfers occur, InvestRE ensures that appropriate safeguards are in place, including one or more of the following:

- adequacy decisions recognised by the European Commission;
- the EU–US Data Privacy Framework, where the recipient is a certified US entity;
- Standard Contractual Clauses (SCCs) pursuant to European Commission Decision 2021/914;
- additional technical and organisational measures where required.

Oversight

Sub-processors are subject to contractual data protection obligations and must implement appropriate security measures.

InvestRE performs adequate ongoing monitoring of sub-processors as part of its data protection and third-party risk framework.

Changes to sub-processors (where InvestRE acts as data processor)

Information about material changes to sub-processors may be made available through this page or other appropriate communication channels.

Clients may raise reasonable objections to the appointment of a new sub-processor on data protection grounds. Any objection must be substantiated and submitted within a reasonable timeframe following the publication of the update.

Where a valid objection cannot be reasonably addressed, InvestRE may offer an alternative solution where feasible or, as a last resort, allow the client to discontinue the affected service.

Where InvesTRe acts as an independent data controller, service providers may process personal data on InvesTRe's behalf as processors. **In this context, the sub-processor framework applicable to client data processing — including objection rights relating to the appointment of sub-processors — does not apply.** InvesTRe nevertheless selects and monitors its service providers in accordance with its data protection and third-party risk management framework to ensure an appropriate level of protection for personal data.

Further information

This section should be read together with our General Privacy Notice, which provides additional information on our data processing activities, international transfers and your rights.

For any questions regarding sub-processors, data protection or the exercise of your rights, you may contact us at privacy@investre.eu.