APPENDIX TO THE DATA PROTECTION AND PROFESIONAL SECRECY NOTICE FOR CLIENTS

Andbank Luxembourg SA (the “**Bank**”) provides further details regarding its data processing activities in this appendix (hereinafter, “**Appendix**”). This Appendix forms part of the client data protection and professional secrecy notice (“**Client Notice**”) and provides additional information regarding the processing of personal data, including the categories of personal data processed, the purposes for which such data is processed, the categories of recipients with whom personal data may be shared, and the service providers to whom we outsource certain services.

This Appendix is maintained as a separate document to enable it to be updated from time to time to reflect detailed operational, legal, regulatory, or business changes without requiring amendments to the Client Notice.

The most current version of this Appendix is available on our website and should be read together with the Client Notice. Where this Appendix is updated, the revised version published on our website will supersede any previous version from its effective date.

This Appendix does not replace the Client Notice and should be read in conjunction with it.

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Appendix I – Main Data Processing and Outsourcing Activities

Row	Data that we process	Data recipient (person or entity receiving the data)[11]	Purpose(s) for which we process or share the data	Outsourcing activity (where applicable)	Legitimacy for processing (article 6 GDPR)
1	Any personal data provided at account opening and throughout your banking relationship (notably identification data: name, birth date, nationality, family status, contact details, and financial data: origin of funds, tax identification number etc.).	AL[1] private department; Designated personnel of ABS[3] and ABAR[2] depending on the services subscribed (e.g credits, DPM, etc).	To provide banking and/or ancillary services and ensure the coordinated provision of certain services in the clients' best interests.	N/A	Contract. Consent.
2	Where you are introduced by a third party business introducer or ABS[3] your financial and personal data contained in your account shall be exchanged with, and/or consulted (read-only).	Third party business introducer; Designated personnel of ABS[3] if introduced by them.	To manage the business introducer relationship.	N/A	Consent.

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3	Where you have granted a power of attorney to a third party, consultative (read-only) or full access (read and write) to your personal data contained in your account(s) will be granted in accordance with the terms of the power of attorney.	Proxyholder.	To execute the access rights defined in any power of attorney granted by the client.	N/A	Consent via contract (power of attorney).
4	Your identification data (name, nationality, date of birth), and any other information requested by the Bank, including data pertaining to convictions and offences and on the holding of a public office or political mandate, will be processed by the Bank and, where necessary, shared with regulatory authorities.	AL compliance department; ABAR[2] compliance department; Opexia[5] Regulatory authorities and public officers including the Commission de Surveillance du Secteur Financier "CSSF", financial intelligence unit "FIU", cellule de renseignement du parquet "CRF", or any public officers.	To conduct "Know Your Client" due diligence checks and to combat money laundering and terrorist financing as part of our regulatory obligations.	We outsource the maintenance of AML related applications to ABAR (i.e Namebook, OFSAA, EastNet) which is established in Andorra; We outsource AML reporting services to our provider, Opexia, which is established in Luxembourg.	Legal obligation under the Law of 12 November 2004 on the fight against money laundering and terrorist financing; Contract.

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5	We share certain financial data about your security order (security type and pricing), and identification data (an electronic identification number) and where operationally required, your name, with ABAR in order to settle security orders.	AL dealing room; ABAR treasury department.	To settle security orders and financial instruments (i.e FOREX, fixed income, client deposits, commodities, futures and operations etc.).	We outsource certain back office activities to ABAR, including part of the settlement of security orders and reconciliation of clients' securities positions.	Contract; Consent
6	Where you are a financial counterparty to any derivative trades, we share with ABAR and the designated trade repository, your unique identification code in order to comply with EMIR reporting requirements.	ABAR; DTCC Derivatives Repository Ltd.[6]	To conduct EMIR reporting as part of our regulatory obligations.	We outsource certain back office activities to ABAR, including the reporting of certain derivative trades under EMIR to the designated trade repository, DTCC Derivatives Repository Ltd. which is established in the United Kingdom.	Legal obligation under Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories to conduct EMIR reporting (notably, the data listed in Annex I of Commission Delegated Regulation (EU) 2022/1855 of 10 June 2022); Contract.

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7	Your personal and financial data is stored in several business applications as part of the outsourcing of IT services to our third party IT service providers.	AL IT, private, investment desk, compliance, risk, finance, internal audit departments; IT ABAR; IT service providers based in the EEA.	To provide you with core banking and/or ancillary services.	We outsource IT operations, notably the infrastructure, maintenance and backups of the IT system, security measures, and the maintenance of several business applications to our parent company, ABAR, which is based in Andorra. We also outsource the technical functionalities, notably the consultation accesses and API in relation to our homebanking application, to our service provider Luxhub[7], which is based in Luxembourg.	Consent; Contract
8	Your personal and financial data may be stored and backed up on a cloud by our cloud service providers which host their data centres in the European Economic Area (EEA).	Cloud service providers based in the EEA (e.g Microsoft 365 cloud[8] and Google cloud platform[9])	To provide you with core banking and/or ancillary services.	Cloud solutions are outsourced to third party cloud providers in relation to business applications involving email communication and exchanges (e.g Microsoft Office), and the placement of client orders (e.g PAM).	Consent; Contract

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9	Your identification data (name) and financial data (IBAN, balance transferred) pertaining to each payment transaction is transferred to service providers acting as correspondent bank or otherwise involved in the transmission or execution of the payment order.	Service providers and correspondent banks, mainly: Society for Worldwide Interbank Financial Telecommunication (SWIFT); ABAR; ABS[3]; Allfunds[10]; BNY Mellon[12]; BCEE[13]; BCL[14] ; Cecabank[19]	To execute cash payment and security orders as part of our ancillary services provided, and in accordance with client instructions.	N/A	Consent; Contract
10	Where our reporting obligations are triggered, your identification and financial data relating to a payment order (i.e payee name, VAT and TIN number, account ID, date and time of transfer, currency, amount, location data of payer) will be shared with our service provider, ABAR, and the CESOP database.	AL IT and operations; ABAR operations; Central Electronic System of Payment information (CESOP) database.	To combat e-commerce VAT fraud in accordance with our CESOP reporting requirements.	N/A	Legitimate interest; Legal obligation to conduct the reporting under Council Directive (EU) 2020/284 as transposed by the Luxembourg Law of 26 July 2023 regarding the introduction of certain requirements applicable to payment service providers.
11	For fund / securities distribution services or where we act as Nominee Investor, your contact details (e-mail) will be shared with	AL operations; ABAR; ABS; Allfunds;	To allow certain specialized intermediaries to provide you with mandatory information about the fund	N/A	Contract; Consent.

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	the intermediary acting as fund manager or broker in order to enable them to send you mandatory (tax) information about the fund / security.	Allfunds Spain[15].	or security that you have subscribed to.		
12	For fund / securities distribution services your personal data relating to direct and indirect beneficial ownership information of the aforesaid securities and data relating to the source of the funds is shared with marketing intermediaries involved in the transmission or execution of a specific transaction.	AL operations; ABAR; Allfunds; Allfunds Spain; Other marketing intermediaries that we may contract with.	To allow the marketing intermediaries to comply with their AML obligations.	N/A	Legitimate interest; Consent.
13	When establishing a credit facility, your financial and personal data is processed to assess your creditworthiness and repayment capacity, and to consider the enforcement or application of remedies in accordance with the credit's terms and conditions in the dedicated committee, which is subsequently then shared with our parent company, ABAR.	AL risk management; AL legal; AL authorized management; ABAR global risk management.	To conduct the necessary credit analysis in order to provide certain financial products and services and enforce its terms and conditions.	N/A	Legal obligation to monitor and report to management under the EBA/GL/2020/06 locally transposed in the CSSF circular 22/824; Contract; Consent.
14	Your financial data (i.e credit exposure, assets) and identification data (i.e name, place of residence, behavioral data)	AL risk management, authorized management, private department;	To perform the global credit risk monitoring function of the Andbank group, we send daily risk reports internally to	N/A	Consent; Legitimate interest to assess credit worthiness;

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	relating to your credit operations is regularly processed to monitor credit irregularities (i.e overdrafts, matured credit lines).	global risk department of ABAR.	our authorized management, and externally, to our parent company.		Legal obligation to monitor and report to management under the EBA/GL/2020/06 locally transposed in the CSSF circular 22/824; Contract.
15	Your financial data and personal data contained in the daily reports regarding all risks at the bank (notably credit risk, country, counterparty risk, market risk etc.) are shared with our management and our parent company, ABAR.	AL authorized management, dealing room, operations, finance; global risk department of ABAR; global finance department of ABAR.	To regularly report all banking risks on a daily basis internally, to our management, and externally, to our parent company, as part of our lines of defence in terms of internal governance.	N/A	Consent; Legal obligation to establish lines of defence as part of our governance requirements under CSSF Circular 12/552; Legitimate interest.
16	Your financial and identification data is shared with certain regulatory authorities in order to comply with regulatory reporting requirements (daily liquidity reports, monthly and quarterly prudential reports, annual risk reports, bi-annual recovery plan reports).	AL risk management, compliance, and finance; Opexia; CSSF; BCL.	To comply with our legal reporting requirements under the CRR and CRD.	We outsource certain prudential reporting obligations to our service provider, Opexia, which is established in Luxembourg.	Legal obligation under the “CRR” or Regulation (EU) No 575/2013 of 26 June 2013 on prudential requirements for credit institutions and investment firms; and the “CRD” or Directive 2013/36/EU of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms.

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17	Your personal identification data (i.e name, address) and credit card contract information is shared with ABAR in order to deliver your credit card and PIN by post.	AL operations; ABAR.	To deliver your credit card and the dedicated PIN code.	N/A	Contract; Legitimate interest.
18	Your personal identification data financial data, including IBAN, account balances, assets, income and tax residency, shall be disclosed to the Luxembourg tax authorities where required under applicable tax reporting and exchange of information regimes, including CRS (if resident in a CRS-participating jurisdiction) and FATCA (for US clients), or in cases where there is a tax inquiry or summons ordering payment of an outstanding amount from the tax authorities.	Luxembourg tax authorities (*Administration des contributions directes*) who may subsequently share with other foreign tax authorities if required.	To conduct mandatory tax reporting and/or respond to any tax summons payment order encumbered on the Bank.	N/A	Legal obligations under Directive 2014/107/EU as regards mandatory automatic exchange of information in the field of taxation, Foreign Account Tax Compliance Act ("FATCA"), Directive 2010/24/EU of 16 March 2010 concerning mutual assistance for the recovery of claims relating to taxes, duties and other measures and art. 8 of the Luxembourg Law of 27 November 1933, where applicable.
19	Where you are a corporate client, your VAT, corporate income tax information, and identification data (name, nationality, location data), will be shared with our tax advisor providers and reported to the Luxembourg tax authority.	Luxembourg tax authorities (*Administration des contributions directes*) ; Our tax advisor, Deloitte[16]	To comply with VAT tax reporting requirements.	N/A	Legal obligation under Law of 12 February 1979 on VAT and General Tax Law of 22 May 1931.

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20	If you are a Spanish tax resident, your financial data (open accounts of clients residing in Spain, information regarding loans and credits relating to immovable property) will be shared with the Spanish Tax Authorities.	Spanish Tax Authorities (*Agencia Estatal de Administración Tributaria*)	To comply with Spanish tax reporting regulations.	N/A	Legal obligation under Real Decreto 253/2025 and Orden HAC/747/2025, de 27 de Junio 2025.
21	Your personal data and financial data contained in your account will be shared with employees of ABAR, ABAR Gestio, and ABS (our sister company) if you have subscribed to discretionary portfolio management services (“DPM”).	AL discretionary portfolio manager; ABAR Gestio[4] ABAR; ABS.	To provide DPM services that render the client’s interests in an efficient and advantageous way with the support of our affiliated companies in the Andbank group.	N/A	Consent; Contract.
22	Any personal data you provide in a telephone call with your private banker or our dealing room staff in the context of a client order is recorded in our IT systems for the sole purpose of ensuring the correct execution of transactions.	AL operations; AL IT.	To comply with the MiFID II Directive requirement to monitor the correct execution of transactions concluded when dealing on own account, and for the reception, transmission and execution of client orders. This data is not accessed for any other purpose.	N/A	Legal obligation under MiFID II Directive 2014/65 as transposed in art. 37-1(6a) Law of 5 April 1993 on the financial sector; Legitimate interest: internal control purposes.
23	Your identification data and financial data relating to your accounts may be shared with certain judicial authorities upon their request (notably in the	National and international judicial authorities, appointed liquidators and receivers (*curateurs*) in the	To comply with judicial requests and orders.	N/A	Legal obligation under Regulation (EU) No. 655/2017 of the European Parliament and of the Council establishing a

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	context of an account preservation, freezing order, liquidation order)	case of liquidation or bankruptcies.			European Account Preservation Order for the attachment of bank accounts
24	Your identification data contained in certain documents may be shared with Luxembourg or EU based notaries in the case of administration of inheritance, special credit operations, or any other service rendered by the Bank which requires the notary's intervention (e.g notarization).	Notaries established in Luxembourg or, where necessary, other countries.	To perform ancillary services such as administration of inheritance or special credit operations as agreed upon between the Bank and client.	N/A	Contract; Legitimate interest; Legal obligation to administer inheritance under Civil Code, Book 3, Title I, Chapter I, Art. 724 (for the rights of heirs vis a vis the deceased estate).
25	Video surveillance recording of when you enter and exit the Bank premises.	AL HR and our authorized management; Our surveillance service provider, G4S[17]	To maintain physical security and limited access to the Bank's premises.	N/A	Legitimate interest.
26	Your account number, country of fiscal residence, and an aggregate of the total number of financial assets is shared with the global finance of ABAR to conduct the monthly accounting closing process.	AL finance; global finance department of ABAR	To conduct the monthly accounting closing process with the support of our parent company.	N/A	Consent; Contract.

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27	Your identification data (unique identifier of transaction allowing to link signed document, name of signatory, connection times, e-mail address, IP address, geolocation, authentication history), biometric data (if using QES), and behavioral data (i.e sent, viewed, signed, status of completion) is processed to execute the electronic signatures.	AL IT; IT ABAR; Appian[18]; Docusign[20]; Any other qualified trust provider.	To use a platform that facilitates the collection of electronic signatures for documents signed between the Bank and client.	We receive externalized support from our service providers and parent company to execute the e-signatures of clients.	Legitimate interest; Contract.
28	For SEPA credit transfers, we share your IP address, Device ID, name, financial scoring, payment history data with our service provider in Spain in order to execute instant credit transfers in euro and to complete verification of payee obligations.	AL operations; Cecabank[19]	To provide instant credit SEPA transfers in euro and complete our verification of payee obligations.	We outsource the ICT aspects of the instant payment and verification of payee functions to Cecabank.	Contract; Legitimate interest; Legal obligation under Regulation (EU) 2024/886 of the European Parliament and of the Council of 13 March 2024 as regards instant credit transfers in euro.
29	If you are a lawful heir to a deceased client, your personal and financial data is processed in order for the Bank to administer the inheritance.	AL private department ; AL investment desk; AL compliance and legal; ABS legal (if a Spanish law governing inheritance).	To administer the rights of lawful heirs of any deceased client, including the transfer of assets to the heirs or, where applicable, the opening of an account with the Bank in their name for the purpose of receiving such assets.	N/A	Legal obligation to administer inheritance under Civil Code, Book 3, Title I, Chapter I, Art. 724 (for the rights of heirs vis a vis the deceased estate); Contract

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30	Your identification data, account data and IBAN is reported to the central electronic data system in compliance with the central deposit reporting requirements.	Central electronic data retrieval system; Luxhub[7] (our reporting provider); CSSF or other national authorities such as FIU which may access the CEDR systems.	To comply with central deposit reporting requirements.	N/A	Legal obligation under Law of 25 March 2020, as amended, establishing a central electronic data retrieval system related to payment accounts and bank accounts identified by IBAN and safe-deposit boxes held by credit institutions in Luxembourg.
31	If you are a Portuguese resident, your financial data related to your credits, overdrafts, loans is shared with the central credit register in Portugal.	AL risk management; AL private Department; and Banco de Portugal[21].	To comply with reporting requirements.	N/A	Legal obligation under Annex II Decree-Law No 103/2025 of 11 September 2025.

[1] AL refers to Andbank Luxembourg SA, with registered office at 4, rue Jean Monnet, L-2180 Luxembourg.

[2]ABAR refers to Andorra Banc Agrícol Reig SA, with registered office at Manel Cerqueda Escaler, 6, Escaldes, Andorra. AL's IT system and backups of the system are hosted and managed by ABAR.

[3]ABS refers to Andbank España Banca Privada, with registered address at 22, Paseo De La Castellana, 28046 Madrid, Spain

[4]ABAR Gestio refers to ANDORRA GESTIÓ AGRÍCOL REIG, SAU, SGOIC, an entity incorporated under the laws of the Principality of Andorra whose registered office is at Carrer Manuel Cerqueda i Escaler, number 3-5, Escaldes-Engordany.

[5] Opexia S.A. a PSF, supervised by the CSSF, with registered address 4, Rue Henri M. Schnadt, 2530 Luxembourg.

[6] DTCC Derivatives Repository Ltd. with registered address Broadgate Quarter, 7th Floor, One Snowden Street, London, EC2A 2DQ.

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[7] Luxhub SA, with registered office at 153155, rue du Kiem, 8030 Strassen, Luxembourg, registered with the Luxembourg Trade and Companies Register under number B223400 and duly authorized by the Commission de Surveillance du Secteur Financier (CSSF) to provide payment initiation and account information services in accordance with the PS Law.

[8] Microsoft 365 cloud refers to the Microsoft Azure cloud computing services provided by Microsoft Ireland Operations Limited, One Microsoft Place, South Country Business Park, Leopardstown, Dublin 18, D18 P 521, Ireland.

[9] Google cloud platform refers to the cloud computing services provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States.

[10] Allfunds refers to the Luxembourg branch of the Allfunds Bank S.A.U, which is duly authorised as a branch of a foreign bank supervised by the Commission de Surveillance du Secteur Financier (CSSF), with registered office, in 30 Bd Royal, 2449 Ville-Haute Luxembourg, Luxembourg.

[11] Service providers are listed for indicative purposes and should also concern any appointed successor(s).

[12] BNY Mellon, with registered address 240 Greenwich St New York, NY 10007 United States of America.

[13] BCEE refers to Banque et Caisse d'Epargne de l'Etat, supervised by the European Central Bank, with registered address, 1 Place de Metz, 1930 Gare, Luxembourg.

[14] BCL refers to Banque Centrale du Luxembourg, 2 boulevard Royal L-2983 Luxembourg.

[15] Allfunds Spain refers to Allfunds Bank S.A.U, a credit institution duly regulated by the Bank of Spain under number 0011 and authorised by the Spanish Securities Market Commission (CNMV) to act as a broker and fund distributor with registered office in Padres Dominicos, 7 , 28050 – Madrid and registered in the "Registro Mercantil de Madrid" under (tomo 15,897, libro 0, sección 8, folio 17, página M568651).

[16] Deloitte Luxembourg with registered address at 20, Boulevard de Kockelscheuer, L-1821 Luxembourg.

[17] G4S General Services S.A. with registered address at 14, Rue du Père Raphaël, L-2413, Luxembourg.

[18] APPIAN SOFTWARE INTERNATIONAL LLC as distributed by VASS Consultoría de Sistemas S.L Avenida de Europa 1, Edificio B, 28108, Alcobendas, Madrid, Spain.

[19] Cecabank S.A. registered under Code 2000 in the Register of Banks and Bankers of the Bank of Spain, and in the Mercantile Register of Madrid, under Volume 30,405, Book O, folio 57, Section 8, Sheet M-547,250, Entry 1. Its registered address Calle Alcalá, 27, MADRID (28014), with Tax ID Code A-86436011.

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[20] DocuSign Inc, with registered address 221 Main Street, Suite 1550 San Francisco, CA 94105, United States.

[21] Banco de Portugal, Rua do Comércio No 148, 1100-150 Lisbon.