

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. [The Client authorises, instructs and consents to CBL to share Client Data in the context of outsourcing and for such other purposes as provided in the General Terms and Conditions.](#)

CBL has stringent control mechanisms in place ensuring [confidentiality of Client Data](#). [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 shares Client Data [mainly](#) within the internal operating framework of Deutsche Börse Group, and here primarily with

- Clearstream Europe AG (Germany);
- Deutsche Börse AG (Germany);
- Clearstream Australia Limited (Australia);
- [Clearstream International S.A \(Luxembourg\)](#)
- [LuxCSD S.A. \(Luxembourg\)](#)
- 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).

[For the purpose of client onboarding and for the fulfilment of anti-money laundering, countering the financing of terrorism \(CTF\) and know-your customer \(KYC\) duties, in compliance with applicable laws and regulations, CBL and other Affiliates of Deutsche Börse AG use common platform tools to collect and process Client Data. To the extent the Client is also a client or intends to become a client of any Affiliate, such data may be shared with the relevant Affiliate\(s\) through these platform tools. The data shared remains limited to the data as required for these purposes by applicable laws, regulations and internal policies.](#)

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 Fees.

2. Country of Establishment of Data Recipient

2.1 Client services

Service		Country
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 <i>including potential services by Affiliates</i>		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA
Sales <i>including potential services by Affiliates</i>		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA

2.2 Internal functions

Function	Country
IT	Austria, Belgium, Czech Republic, Finland, France, Germany, India, Ireland, Luxembourg, Netherlands, USA
Regulatory Reporting	UK
Tax	UK, USA
Legal	Germany, Luxembourg, Singapore, Switzerland, USA
Compliance	Czech Republic, Germany, Ireland, Luxembourg, Singapore, UK, USA
Treasury	Czech Republic, Germany, Singapore
Data Protection	Germany
Marketing	Germany
Product, Services and Business Development <i>including preparation of market and client analyses and statistical models</i>	Czech Republic, Germany, Switzerland, UK

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.