



21X | DLT-Trading and Settlement System

PROCESSOR LIST

21X AG
Bleichstraße 64
60313 Frankfurt am Main
Germany

October 2026

1. OVERVIEW

At 21X AG, the protection of personal data is a core part of our commitment to transparency, trust, and compliance with the General Data Protection Regulation (GDPR).

As a financial technology company operating a regulated DLT trading and settlement system (DLT-TSS), we handle personal data in a secure and responsible manner. To provide our services effectively and reliably, we may engage a limited number of service providers (processors), including entities of our group, who support us in specific operational tasks. These processors may process personal data on our behalf, but only in ways that are necessary to deliver core functionalities of our platform and services.

The processors listed in this document process personal data from the moment you apply to become a participant of the 21X DLT-TSS, for example when you complete our onboarding forms or identity verification, and throughout the business relationship. Visiting our public website alone does not involve any processing of personal data by these processors.

We carefully vet each processor to ensure they meet stringent data protection and security standards, and we enter into appropriate contractual arrangements to ensure compliance with applicable legal requirements, particularly under Article 28 GDPR.

All processors are obligated to handle personal data strictly in accordance with our instructions and are not permitted to use it for any other purpose. Our processors may engage further processors (sub-processors), including their own group companies, under the conditions of Article 28(2) and (4) GDPR. These sub-processors may process or access personal data outside the EEA. Such transfers are based on an adequacy decision of the European Commission (including the EU-U.S. Data Privacy Framework) or on Standard Contractual Clauses. The table lists the relevant sub-processors of each processor; where a processor publishes its own list, the table links to it.

Issuers of the financial instruments traded on the 21X DLT-TSS, which receive KYC data to execute transactions, act as independent controllers and are therefore not included in this list. Further information is provided in our Privacy Notice.

Below, you will find a current list of all processors engaged by 21X AG, including the services they provide, their location, and a general description of how they support our operations.

2. PROCESSOR LIST

Processor	Service Provided	Location of Processing	Description of Processing and Sub-processors
21X Service GmbH	Platform Operation and Onboarding Forms	Germany	Trading platform operation where customer data is stored. Provision of web-based onboarding forms. Sub-processors: Amazon Web Services EMEA SARL - cloud infrastructure for platform operations (IaaS), Frankfurt region, Germany; HubSpot Germany GmbH - web-based onboarding forms, EU data centre (Germany). HubSpot's sub-processors: legal.hubspot.com/sub-processors-page Microsoft Ireland Operations Limited - Document Storage, Frankfurt Region, Germany. Subprocessors: servicetrust.microsoft.com
IDnow GmbH	ID Verification (Videoident)	Germany (hosting: noris network AG, Nuremberg)	Verification of customer identity and KYC services. Sub-processors: Call-centre service providers for Videoident in Germany, Romania, Bulgaria and Croatia. Full list available on request.
Sanction Scanner Ltd	Sanction Screening	Germany United Kingdom	Screening of customer information against international sanctions and watchlists (AML). Sub-processors: None.
Lukka Inc.	Wallet Screening	USA	Analysis and risk scoring of blockchain wallet addresses to detect illicit activity. Sub-processors: Amazon Web Services, Inc. - cloud hosting and data storage, USA and Germany; Atman sp. z o.o. - data centre for blockchain node infrastructure, Poland.
eflow Ltd	Transaction Reporting Market Surveillance	Ireland United Kingdom	Trade surveillance and market abuse monitoring. Automated Transaction Reporting. Sub-processors: None.