



# **21X | DLT-Trading and Settlement System**

## **SUB-PROCESSORS LIST**

21X AG  
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## **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 exchange platform, we handle personal data in a secure and responsible manner.

To provide our services effectively and reliably, we may engage a limited number of third-party service providers, known as sub-processors, who support us in specific operational tasks. These sub-processors may process personal data on our behalf, but only in ways that are necessary to deliver core functionalities of our platform and services.

Importantly, the sub-processors listed in this document only become relevant once you register as a customer of 21X AG, using your credentials for trading on our exchange. Visiting our public website alone does not involve any processing of personal data by these sub-processors.

We carefully vet each sub-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 sub-processors are obligated to handle personal data strictly in accordance with our instructions and are not permitted to use it for any other purpose.

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

## 2. SUB-PROCESSOR LIST

<b>Sub-processor Name</b>	<b>Service Provided</b>	<b>Location of Processing</b>	<b>Description of Processing</b>
<b>21.finance DLT-TSS Software GmbH</b>	Platform Operation	EU EEA	Trading platform operation where customer data is stored.
<b>IDnow GmbH</b>	ID Verification	Germany	Verification of customer identity and KYC services.
<b>Sanction Scanner Ltd</b>	Sanction Screening	Germany United Kingdom	Screening of customer information against international sanctions and watchlists (AML).
<b>Lukka Inc.</b>	Wallet Screening	USA	Analysis and risk scoring of blockchain wallet addresses to detect illicit activity.
<b>eFlow Ltd</b>	Transaction Reporting Market Surveillance	Ireland United Kingdom	Trade surveillance and market abuse monitoring. Automated Transaction Reporting.
<b>Black Manta Capital Partners S.à.r.l.</b>	Issuer and Registrar	EU	Maintenance of issuer registry and recording digital securities transactions.