

## COMPLYLOG DATA PRIVACY FACTSHEET

ComplyLog is Euronext's trusted suite of secure, cloud-based compliance tools, purpose-built to support companies navigating complex regulatory obligations. Designed for legal, compliance, and governance professionals, ComplyLog transforms manual, error-prone compliance processes into seamless digital workflows-saving time, reducing legal exposure, and improving audit-readiness across the board.

Our solutions help organizations comply with key EU regulations, including the Market Abuse Regulation (MAR) and the EU Whistleblowing Directive, while aligning with best practices in data protection and operational governance.

### **ComplyLog makes it:**

- **Easy** to deploy and configure for your structure;
- **Fast** to use, with intuitive dashboards and automation;
- **Secure** by design, with ISO/IEC 27001-certified infrastructure;
- **Audit-ready** for internal reviews, regulators, and stakeholders.

Built and maintained by compliance professionals for compliance professionals, ComplyLog supports organisations across Europe in both the private and public sector-delivering control, transparency, and peace of mind at every step of the compliance lifecycle.

## TRUSTED CLOUD-BASED COMPLIANCE TOOLS:

Whether you're managing:

- **InsiderLog** - Manage insider lists across multiple subsidiaries;
- **TradeLog** - Handle employee trading approvals and conflicts of interest;
- **IntegrityLog** - Operate whistleblower channels with secure, anonymous case handling;
- **LiabilityLog** - Maintain liability registers for public service roles in municipalities or listed firms.
- **EuroStockNews** - Distribute regulated market announcements and financial news securely and efficiently;
- **LiveEquity** - Engage with investors in real time through secure, interactive digital events.

## WE TAKE DATA PRIVACY PERSONALLY

Our clients operate in sensitive regulatory environments. That's why data protection is core to how ComplyLog is built and delivered.

### **WHAT SETS US APART**

- **ISO/IEC 27001** certified for information security;

- **Data stored in the EU** - we only transfer personal data outside the EU when necessary and with appropriate safeguards in place;
- **End-to-end encryption** for data in transit and at rest;
- **Role-based access controls**, strict internal data segregation;
- **24/7 monitoring**, regular security audits, and penetration testing.

## WHO'S RESPONSIBLE FOR YOUR DATA?

It depends on how you use ComplyLog:

| Scenario                                                   | Our Role                                                    |
|------------------------------------------------------------|-------------------------------------------------------------|
| You visit our website, attend an event, or request a demo  | Data Controller - we determine how your data is used        |
| You use our product as part of your company's subscription | Data Processor - we follow your organisation's instructions |

**Need clarity? Just ask—we're transparent about our data roles.**

## PRIVACY & COMPLIANCE

| Question                                                                                       | Answer                                                                                                                                                              |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Is ComplyLog compliant with the GDPR?                                                          | ComplyLog is fully compliant with GDPR. We continuously monitor regulatory developments in other jurisdictions where we operate and adapt our controls accordingly. |
| Do you have a Data Protection Officer (DPO)?                                                   | Yes. Our DPO is part of Euronext's central governance. You can reach the DPO at <a href="mailto:dpo.ecs@euronext.com">dpo.ecs@euronext.com</a> .                    |
| Do you have a program in place to address compliance with applicable data privacy legislation? | Yes. ComplyLog has a GDPR-compliant privacy program, centrally managed by the Group DPO.                                                                            |

## DATA LOCATION & CROSS-BORDER TRANSFERS

| Question                                                        | Answer                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Where is my data stored?                                        | All client data is securely stored within the European Economic Area (EEA). We do not transfer personal data outside the EEA unless such transfer is necessary for the provision of our services and is subject to appropriate safeguards in accordance with applicable Data Protection Laws, including the use of standard contractual clauses or other approved transfer mechanisms. |
| Are international data transfers compliant with EU regulations? | Yes. When needed, we rely on SCCs, the EU-U.S. Data Privacy Framework, or equivalent UK/Swiss arrangements.                                                                                                                                                                                                                                                                            |

## ACCESS CONTROL & DATA ISOLATION

| Question                                   | Answer                                                                                                                                                 |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| How do you manage access to personal data? | Access is strictly role-based, granted on a "least privilege" basis, and logged for audit. We also segregate environments using isolated AWS accounts. |
| Can ComplyLog staff see our data?          | Only authorised personnel with a legitimate need-such as support engineers-may access data, and only under strict security procedures.                 |

## DATA PORTABILITY, RETENTION & DELETION

| Question | Answer |
|----------|--------|
|----------|--------|

|                                                        |                                                                                                                                              |
|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Can we export our data if we stop using your services? | Yes. Clients can export their data at any time, and ComplyLog assists with full data retrieval before contract termination.                  |
| How long is data retained after contract termination?  | By default, we retain data for up to 5 years to meet audit and legal requirements. Custom retention timelines can be agreed upon in advance. |
| Is there an automated data deletion policy?            | Yes. Our retention schedules are enforced through automated workflows and periodic reviews.                                                  |

## SUPPORT WITH DPIA REQUESTS

| Question                                      | Answer                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WILL complylog help with a DPIA?              | No. When you, as data controller, wish to conduct a Data Protection Impact Assessment (DPIA), Complylog is committed to supporting you with the necessary information. As your data processor, we cannot perform the DPIA on your behalf, but we will provide the technical, organizational, and contractual details you need to complete your assessment. This note explains our role and how we can assist you. |
| What kind of support will I get for a DPIA?   | Complylog will assist you by providing the information you need, such as details of our technical and organisational measures, our hosting environment, and our sub-processors.                                                                                                                                                                                                                                   |
| Can I work with complylog to complete a DPIA? | As Controller, you are responsible for completing the DPIA. Complylog will support you by answering specific questions and providing the necessary details to help you finalise your assessment efficiently.                                                                                                                                                                                                      |

## ENCRYPTION & PROTECTION

| Question | Answer |
|----------|--------|
|----------|--------|

|                                             |                                                                                                                                      |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Do you encrypt data at rest and in transit? | Yes. All sensitive data is encrypted using TLS for transmission and AES-256 at rest. Our workstations are protected using BitLocker. |
| Are passwords and sessions secured?         | Yes. We enforce strict password policies, use session timeouts, and offer local encryption for stored credentials.                   |

## SUB-PROCESSORS & VENDORS

| Question                                              | Answer                                                                                                                                                                                                               |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Do you use sub-processors?                            | Yes, and we maintain a vetted, documented list. Clients are notified of sub-processor changes and have the right to object under our DPA. <a href="#">This list can be found online, through the following link:</a> |
| How do you ensure sub-processors meet your standards? | All sub-processors are bound by contractual DPAs, undergo due diligence, and are required to comply with equivalent security controls.                                                                               |

## MONITORING, AUDITS & CONTROL

| Question                                | Answer                                                                                                  |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------|
| Is the system monitored?                | Yes. Our environments are monitored 24/7, including system health, intrusion detection, and usage logs. |
| Can clients audit ComplyLog's controls? | Yes, upon request and in accordance with the terms of our Data Processing Agreement (DPA).              |

## CUSTOMIZATION & FLEXIBILITY

| Question                                                          | Answer                                                                                                                |
|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Can we configure how long data is stored or how it's processed?   | Absolutely. We offer custom retention settings, user roles, and data access configurations tailored to your policies. |
| Does ComplyLog support multi-language or jurisdictional settings? | Yes. Our tools are multi-lingual, and our privacy setup accommodates cross-border and sector-specific compliance.     |

## GLOBAL REACH, EUROPEAN ROOTS

ComplyLog is headquartered in Stockholm, operated by Euronext Corporate Solutions Sweden AB, and part of the Euronext N.V. Group-Europe's leading market infrastructure provider. Our infrastructure and privacy practices are aligned with:

- EU GDPR
- UK GDPR
- Finnish, French & Dutch compliance laws
- Participation in EU-U.S. and UK Data Privacy Frameworks

## READY TO COMPLY WITH CONFIDENCE?

Whether you're embarking on your compliance journey, looking to enhance existing processes, or scaling an established program to meet evolving regulatory demands, ComplyLog stands as the trusted partner for regulated teams across Europe. With our robust, secure, and compliant solutions, we empower organizations to manage their compliance requirements effectively, mitigate risks, and ensure ongoing adherence to the most stringent legal standards.