

LIST OF SUB-PROCESSORS

JTC uses the third-party entities below (each, a “sub-processor”) to perform limited activities which may involve that third-party processing personal data on behalf of JTC’s Clients.

JTC requires all sub-processors to enter into written agreements containing applicable data protection obligations and, where the engagement of a sub-processor requires the cross-border transfer of personal data, JTC ensures that appropriate safeguards are in place (in most instances Standard Contractual Clauses) or that there is an adequacy decision in place for the third country.

In accordance with Article 41 (2a) of the amended Law of 5 April 1993 on the financial sector, JTC shall ensure that any such provider shall be bound by confidentiality obligations in respect of the JTC’s Clients and that such confidentiality obligations shall be at least equivalent to the confidentiality obligations that JTC has towards the JTC’s Clients in accordance with the Client’s Agreement.

ALL JTC SERVICES

The sub-processors below are generally utilised by the JTC Group in order to manage its Information Technology and business infrastructure.

Entity	Delegated Services	Entity Country/Location of data
JTC Group entities	Back Office & support services	See JTC’s list of offices Our Offices Corporate, Funds & Private Client Services JTC (jtcgroup.com)
Microsoft Corporation (and its subsidiaries or group entities)	Provisions of M365 IT services	Ireland
Sure (Jersey) Limited and Sure (Guernsey) Limited	Data Centre hosting services and Network Operations Centre	Jersey/Guernsey
Prosperity Group Limited	IT server infrastructure managed services	Jersey

FUND SERVICES SPECIFIC

The following sub-processors are only applicable in relation to JTC Fund services.

Entity	Delegated Services	Entity Country/Location of data
Puritas Limited	Technical support for PureFunds database	Jersey
Mesh ID BV	Electronic Identity verification services	Netherlands
Fidelity National Information Services, Inc	Fund Accounting Services (FIS InvestOne and FIS InvesTran)	United States / United Kingdom
JTC Fund Solutions RSA (Pty) Limited	1. Accounting and NAV calculations 2. FATCA/CRS reporting; 3. Execution of Payments	South Africa
Morgan Stanley Fund Services USA LLC	Undertaking for Collective Investment (UCI) administration (for clients introduced by Morgan Stanley)	United States (service provided from Ireland)
Alpha Omega Sarl	UCI regulatory Reporting (CSSF, BCL)	Luxembourg
Board Intelligence Limited	Management reporting software and board portal	UK



beTax Advisory & Compliance Services S.à.r.l.	Tax compliance services which may include personal data of limited partners in certain circumstances.	Luxembourg
Arendt Regulatory and Consulting S.A.	To assist with the Anti-Money Laundering (AML)/Know Your Customer (KYC) periodic reviews	Luxembourg
Abler Consulting Ltd	To assist with the Anti-Money Laundering (AML)/Know Your Customer (KYC) periodic reviews	Republic of Mauritius (service provided from Luxembourg)