

Descriptions of Personal Data Processing

To provide various aspects of its products and services, Moody’s may process personal data on behalf of its clients as a “data processor” or “service provider” (or equivalent under applicable law). The subject matter, nature and purpose of the processing is to provide the products and services in the client contract. The duration of the processing is until Moody’s returns or deletes the personal data in accordance with the client contract. The categories of personal data and individuals, third-party service providers, and processing locations are described below.

Cloud hosting locations may be different than the defaults stated below, if specifically selected by client and as per the individual client contract. Moody’s has entered into: (i) EU standard contractual clauses, and (ii) similar data transfer agreements under local applicable law (including the UK), both intragroup and with third-party sub-processors, where applicable.

Product/Service	Categories of Individuals	Categories of Personal Data	Sub-Processors & Location
ABS Suite Plus / ABS Lender / ABS ESG	Individuals* whose personal data are (i) uploaded/saved by client, and/or (ii) matched on behalf of client Likely to include:	Personal data (i) uploaded/saved by client, and/or (ii) matched on behalf of client Likely to include:	Amazon Web Services, Inc. - cloud hosting ABS ESG – Oregon or Virginia, USA ABS Suite Plus / ABS Lender - EMEA clients: Dublin, Ireland Americas clients: Oregon or Virginia, USA APAC clients: Sydney, Australia Aspire Systems, Inc., USA - technical support, systems implementation,

			<p>quality assurance & development</p> <p>Cledar Sp.zo.o., Poland - technical support</p> <p>DataArt Solutions Datamatics Global Services Limited, India - technical support, systems implementation, quality assurance & development</p> <p>ICRA Analytics Ltd, India - technical support, systems implementation, quality assurance & development</p> <p>I-Peritus Solutions & Services Private Limited, India - technical support, systems implementation, quality assurance & development</p> <p>SMIL Group LLC, USA - technical support, systems implementation, quality assurance & development</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Accelerate Farm Profits	Client's customers	Identifiers (e.g., name, location), financial information (e.g., income, expenses), business information (e.g., production, crops, livestock)	<p>Amazon Web Services, Inc. - cloud hosting Oregon or Virginia, USA</p> <p>Intelinair, Inc., USA – field-level data matching</p>

			Tata Consultancy Services - development
AI & Client GRID Review	Client's customers & suppliers	Identifiers (e.g., name, address, date of birth), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	<p>Amazon Web Services, Inc. - cloud hosting EMEA clients: Dublin, Ireland (primary); Frankfurt, Germany (failover) Americas clients: Virginia, USA (primary); Oregon, USA (failover) On client request: Mumbai, India</p> <p>WNS Global Services Private Limited, India – customer support</p> <p>Databricks, Inc., USA, – data analytics</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Analyst GRID Review	Client's customers & suppliers	Identifiers (e.g., name, address, date of birth), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	<p>Amazon Web Services, Inc. - cloud hosting EMEA clients: Dublin, Ireland (primary); Frankfurt, Germany (failover) Americas clients: Virginia, USA (primary); Oregon, USA (failover) On client request: Mumbai, India</p> <p>WNS Global Services Private Limited, India, Romania – customer support, analyst review</p>

			<p>ServicEngine Ltd, Bangladesh – analyst review</p> <p>Databricks, Inc., USA, – data analytics</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
AXIS	Client's policyholders	Demographic data (e.g., age, gender)	<p>Amazon Web Services, Inc. - cloud hosting AWS US East 1</p> <p>Microsoft – cloud hosting Azure East US, Canada & North Europe</p>
Banking Cloud; RiskConfidence Fit+	Client's customers	Identifiers (e.g., name, contact details, date of birth)	<p>Amazon Web Services, Inc. - cloud hosting EMEA clients: Dublin, Ireland APAC clients: Sydney, Australia / Singapore</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Compliance Catalyst	Client's customers & suppliers	Identifiers (e.g., name, business contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	<p>Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Credit Catalyst	Client's customers & suppliers	Identifiers (e.g., name, business contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	<p>Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>

CreditLens (CRE/C&I Modules)	Client's customers	Borrower information (e.g., name, contact details, date of birth), loan details	Amazon Web Services, Inc. - cloud hosting EMEA: Dublin, Ireland Americas: Oregon, USA APAC: Sydney, Australia / Singapore Microsoft OpenAI Azure US Central – only applicable for GenAI Credit Memo functionality Google Cloud hosting US – only applicable for AbleAI functionality
CreditLens Front Office CreditLens Automation CreditLens Back Office	Client's customers	Borrower information (e.g., name, contact details, date of birth), loan details	Amazon Web Services, Inc. - cloud hosting EMEA: Dublin, Ireland Americas: Oregon, USA APAC: Sydney, Australia / Singapore Numerated Growth Technologies, Inc., USA, digital loan origination system
CreditLens Monitor	Client's customers	Borrower information (e.g., name, contact details, date of birth), loan details	Amazon Web Services, Inc. - cloud hosting Dublin, Ireland Oregon, USA
CreditLens KYC Screening	Client's customers	Identifiers (e.g., name, business contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	Amazon Web Services, Inc. - cloud hosting EMEA: Dublin, Ireland Americas: Oregon, USA APAC: Sydney, Australia / Singapore

CRE Portfolio Manager	Client's tenants	Identifiers (e.g., name), property details (e.g., address), lease details	<p>Amazon Web Services, Inc. - cloud hosting Americas clients: Virginia, USA EMEA clients: Frankfurt, Germany</p> <p>Cloudflare, Inc., USA – managed web application firewall</p> <p>Microsoft OpenAI Azure US Central – for CRE Portfolio Assistant</p>
eCredit	Client's customers	Business details (e.g., name, company registration)	N/A
FACT	Client's customers	Identifiers (e.g., name, address)	Amazon Web Services, Inc. - cloud hosting Dublin, Ireland
ImpairmentStudio	Client's customers	Borrower information (e.g., name), loan information	<p>Amazon Web Services, Inc. - cloud hosting Virginia, USA Oregon, USA On client request: Dublin, Ireland Sydney, Australia, UAE</p>
kompany (KYC workspace, Data Remediation, KYC API, Entity Verification API)	Client's customers & suppliers	Identifiers (e.g., name, business contact details), company information (e.g., role/title, ownership/shareholding percentage)	<p>Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany</p> <p>next layer GmbH – cloud hosting, Vienna, Austria</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Learning Solutions	Client's employees	Learner identifiers (e.g., name, business email address), learning records	<p>Learning Technologies Group PLC, USA – cloud hosting</p> <p>Adobe Inc., USA - remote support services</p>

			<p>American Information Solutions, LLC, USA - remote support services</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Lending Cloud	Client’s customers	Borrower information (e.g., name, contact details, date of birth), financial data	Amazon Web Services, Inc. - cloud hosting Oregon, USA
PassFort	Client’s prospects, customers, business partners & suppliers	<p>Identifiers (e.g., name, contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities).</p> <p>KYC/KYS information (e.g., environment, social and governance ratings) (ESG Module).</p> <p>KYC/KYS information (e.g., credit risk score, probability of default, implied ratings, entity peer group) (Probability of Default Module).</p> <p>KYC/KYS information (e.g., scores regarding security incidents/ breaches, online activities, cyber security compliance) (Cyber Risk Module).</p>	<p>Google Cloud Platform – cloud hosting Belgium, EU South Carolina, USA</p> <p>Microsoft – cloud hosting UAE Azure</p> <p>Functional Software, Inc. d/b/a Sentry, USA - error tracking within the platform</p> <p>Elastic NV, USA - search & filtering capabilities within the platform</p> <p>DemystData, Ltd. UK – only applicable for Demyst Integration</p>
PFaroe DB UK	Client’s scheme members / client’s customers’ scheme members	Unique identifier, pension details	Cloudflare, Inc., USA – managed web application firewall
Procurement Catalyst	Client’s suppliers	Identifiers (e.g., name), company information (e.g., role/title)	<p>Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>

QUIQspread	Client's customers	Identifiers (e.g., name)	<p>Amazon Web Services, Inc. – cloud hosting Virginia, USA Dublin, Ireland Singapore</p> <p>Cognaize CSJC, Armenia – financial data AI processing</p> <p>Vol-Smart LLC, USA – financial data AI processing</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
Reporting Studio	Client's customers	Loan details (e.g., counterparty code, transaction ID)	<p>Amazon Web Services, Inc. – cloud hosting Dublin, Ireland Singapore Sydney, Australia</p> <p>Cloudflare, Inc., USA – managed web application firewall</p>
RMS - Analytical & Consulting Services, Claims & Exposure Analysis, Hosting Plus, Professional Services	Client's customers	Property data (e.g., latitude/longitude coordinates, address, zip code), exposure data, policy information (e.g., policy number)	Microsoft – cloud hosting Ireland, Canada
RMS - Intelligent Risk Platform (including Risk Modeler, ExposureIQ, UnderwriteIQ, TreatyIQ, SiteIQ, Location Intelligence API, Data Bridge, Climate on Demand, Risk Data Lake, Integration Center VPN, Admin Center, Risk Data Exchange, Risk Data Labs)	Client's customers	Property data (e.g., latitude/longitude coordinates, address, zip code), exposure data, policy information (e.g., policy number), business information (e.g., company name, address, industry code, assets)	<p>Amazon Web Services, Inc. – cloud hosting Virginia, USA Dublin, Ireland</p> <p>Snowflake, Inc., USA – data analytics</p> <p>Databricks, Inc., USA – data analytics</p> <p>MapBox, Inc., USA - map visualization of location data</p>
RMS - Miu	Client's customers	Property data (e.g., latitude/longitude	Amazon Web Services, Inc. –

		coordinates, address, zip code), exposure data, policy information (e.g., policy number), business information (e.g., company name, address, industry code, assets)	cloud hosting Dublin, Ireland Snowflake, Inc., USA – data analytics
Sales & Marketing Catalyst/BVD Data Matching	Client's customers & suppliers	Identifiers (e.g., name, business contact details)	Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany
Sanctions360	Client's customers & suppliers	Identifiers (e.g., name, business contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities)	Amazon Web Services, Inc. - cloud hosting Virginia, USA Cloudflare, Inc., USA – managed web application firewall
Shell Indicator	Client's customers & suppliers	Identifiers (e.g., name), company information (e.g., role/title, ownership/shareholding percentage)	Google Cloud Platform – cloud hosting Belgium, EU South Carolina, USA Microsoft – cloud hosting UAE Azure Cloudflare, Inc., USA – managed web application firewall
Supply Chain Catalyst	Client's suppliers	Identifiers (e.g., name), company information (e.g., role/title)	Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany Cloudflare, Inc., USA – managed web application firewall
Tax Risk Catalyst	Client's suppliers	Identifiers (e.g., name), company information (e.g., role/title)	Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany Cloudflare, Inc., USA – managed web application firewall

All products and services	As above	As above	Moody's global group companies - technical assistance and client services
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* May include sole traders and unincorporated partnerships under applicable law

Updates

This list may be updated from time-to-time to meet Moody's business needs.

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Any objections to changes to be notified to Moody's under the client contract.