Descriptions of Personal Data Processing

To provide various aspects of its products and services, Moody's may process personal data on behalf of its customers 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 customer contract. The duration of the processing is until Moody's returns or deletes the personal data in accordance with the customer 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 customer and as per the individual customer contract. Moody's has entered: (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 Individuals* whose personal data are (i) uploaded/saved by customer, and/or (ii) matched on behalf of customer Likely to include:	Categories of Personal Data Personal data (i) uploaded/saved by customer, and/or (ii) matched on behalf of customer Likely to include:	Sub-Processors & Location
Able AI/Automated Documents Hub	Customer's end customers	Borrower information (e.g., name, contact details, date of birth), loan details	Google Cloud US - cloud hosting Microsoft OpenAI Azure US Central Twilio, US - email notification system

ABS Suite Plus, Lender, ABS ESG, Manager Modules and Recon	Customer's end customers	Borrower information (e.g., address, account number, borrower type), loan information (e.g., loan type, asset details)	Amazon Web Services, Inc. - cloud hosting EMEA customers: Dublin, Ireland Americas customers: Oregon or Virginia, USA APAC customers: Sydney, Australia ABS ESG only – Oregon or Virginia, Aspire Systems, Inc., USA - technical support, systems implementation,

			quality assurance & development
			Cledar Sp.zo.o., Poland - technical support
			DataArt Solutions, US – systems implementation, quality assurance & development, technical support
			Datamatics Global Services Limited, India - technical support, systems implementation, quality assurance & development
			ICRA Analytics Ltd, India - technical support, systems implementation, quality assurance & development
			I-Peritus Solutions & Services Private Limited, India - technical support, systems implementation, quality assurance & development
			SMIL Group LLC, USA - technical support, systems implementation, quality assurance & development (ABS Suite Plus Only)
			Cloudflare, Inc., USA – managed web application firewall

| Accelerate Farm Profits | Customer's end customers | Identifiers (e.g., name, location), financial information (e.g., income, expenses), business information (e.g., production, crops, livestock) | Amazon Web Services, Inc. - cloud hosting Oregon or Virginia, USA

Intelinair, Inc., USA – field-level data matching |

			Tata Consultancy Services - development
AI & Client GRID Review	Customer's end 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)	Amazon Web Services, Inc. - cloud hosting EMEA customers: Dublin, Ireland (primary); Frankfurt, Germany (failover) Americas customers: Virginia, USA (primary); Oregon, USA (failover) On customer request: Mumbai, India WNS Global Services Private Limited, India – customer support Databricks, Inc., USA, – data analytics Cloudflare, Inc., USA – managed web application firewall
Analyst GRID Review	Customer's end 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)	Amazon Web Services, Inc. - cloud hosting EMEA customers: Dublin, Ireland (primary); Frankfurt, Germany (failover) Americas customers: Virginia, USA (primary); Oregon, USA (failover) On customer request: Mumbai, India WNS Global Services Private Limited, India, Romania – customer support, analyst review

			ServicEngine Ltd, Bangladesh – analyst review Databricks, Inc., USA, – data analytics Cloudflare, Inc., USA – managed web application firewall
AXIS	Customer's policyholders	Demographic data (e.g., age, gender, smoker/non-smoker status)	Amazon Web Services, Inc. - cloud hosting AWS US East 1 Microsoft – cloud hosting Azure East US, Canada & North Europe
Banking Cloud; RiskConfidence Fit+	Customer's end customers	Identifiers (e.g., name, contact details, date of birth)	Amazon Web Services, Inc. - cloud hosting EMEA customers: Dublin, Ireland UAE (on request) APAC customers: Sydney, Australia / Singapore Cloudflare, Inc., USA – managed web application firewall
Compliance Catalyst	Customer's end 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 Frankfurt, Germany For GRID integration: EMEA region: Dublin, Ireland (primary); Frankfurt, Germany (failover) Americas region: US East 1 Virginia (primary); US West 2 Oregon (failover) APAC region: Mumbai, India (on request) Cloudflare, Inc., USA – managed web application firewall

| Credit Catalyst | Customer's end 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 Frankfurt, Germany

For GRID integration: Dublin, Ireland (primary); Frankfurt, Germany (failover)

Cloudflare, Inc., USA – managed web application firewall |
| --- | --- | --- | --- |

CreditLens (CRE/C&I Modules)	Customer's end 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 – applicable for GenAI Credit Memo & Able AI functionality Google Cloud hosting US – only applicable for Able AI functionality Twilio- Able AI functionality
CreditLens Front Office CreditLens Automation CreditLens Back Office	Customer's end 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	Customer's end 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	Customer's end 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	Customer's tenants	Identifiers (e.g., name), property details (e.g., address), lease details	Amazon Web Services, Inc. - cloud hosting Americas customers: Virginia, USA EMEA customers: Frankfurt, Germany Cloudflare, Inc., USA – managed web application firewall Microsoft OpenAI Azure US Central – for CRE Portfolio Assistant
Credit View Research Assistant	Customer's end customers	Identifiers (e.g. name, date of birth, contact details), gender, nationality, share ownership	Amazon Web Services Inc. – cloud hosting- AWS US East 1 (Virginia) & US West 2 (Oregon) Microsoft Azure Central US Cloudflare, Inc., USA – managed web application firewall
eCredit	Customer's end customers	Business details (e.g., name, company registration)	N/A
FACT	Customer's end customers	Identifiers (e.g., name, address)	Amazon Web Services, Inc. - cloud hosting Dublin, Ireland
Flair Diligence	Customer's suppliers	Business details (e.g., company name, registered office, phone numbers) Associated individuals (name, date of appointment, title/role, nationality, PEP status, adverse media, sanctions)	OVH Group SA, OVH cloud, France
ImpairmentStudio	Customer's end customers	Borrower information (e.g., name), loan information	Amazon Web Services, Inc. - cloud hosting Virginia, USA Oregon, USA On customer request: Dublin, Ireland Sydney, Australia, UAE, Singapore

kompany (KYC workspace, Data Remediation, KYC API)	Customer's end customers & suppliers	Identifiers (e.g., name, business contact details), company information (e.g., role/title, ownership/shareholding percentage)	Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany next layer GmbH – cloud hosting, Vienna, Austria Cloudflare, Inc., USA – managed web application firewall
kompany (Entity Verification API)	Customer's end customers & suppliers	Identifiers (e.g., name, business contact details), company information (e.g., role/title, ownership/shareholding percentage)	Google Cloud Platform, hosting locations - GCP US Central 1 (Iowa), GCP US East 1 (South Carolina) Cloudflare, Inc., USA – managed web application firewall
Learning Solutions	Customer's employees	Learner identifiers (e.g., name, business email address), learning records	Learning Technologies Group PLC, USA – cloud hosting Adobe Inc., USA - remote support services

			American Information Solutions, LLC, USA - remote support services Cloudflare, Inc., USA – managed web application firewall
Lending Cloud	Customer's customers	Borrower information (e.g., name, contact details, date of birth), financial data	Amazon Web Services, Inc. - cloud hosting Oregon, USA
Moody's Investigation Tool	Customer's prospects, customers, business partners & suppliers	Identifiers (e.g., name, contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities).	Blackdot Solution Ltd's AWS Hosting in London. AWS- US-East-1 Virginia Hosting for Moody's
PassFort	Customer's prospects, customers, business partners & suppliers	Identifiers (e.g., name, contact details), KYC/KYS information (e.g., sanctions information, political exposed persons status, information relating to unlawful activities). ESG information (e.g., environment, social and governance ratings -ESG Module). Probability of default information (e.g., credit risk score, probability of default, implied ratings, entity peer group - Probability of Default Module). Cyber risk information (e.g., scores regarding security incidents/ breaches, online activities, cyber security compliance - Cyber Risk Module). Forced labor risk information (e.g. contact information, financial, entity, pay, industry, organizational, human resources, revenue and spend information and human rights processes	Google Cloud Platform – cloud hosting Belgium, EU South Carolina, USA Microsoft – cloud hosting UAE Azure Functional Software, Inc. d/b/a Sentry, USA - error tracking within the platform Elastic NV, USA - search & filtering capabilities within the platform Demyst Data, Ltd. UK – only applicable for Demyst Integration Cloudflare, Inc., USA – managed web application firewall- only applicable for ESG, Probability of Default & Cyber Risk Module in PassFort)
PFaroe DB UK	Customer's scheme members / customer's customers' scheme members	Unique identifier, pension details	Cloudflare, Inc., USA – managed web application firewall

PortfolioStudio	Customer's end customers	Borrower information (e.g., name), loan information	Amazon Web Services, Inc. - cloud hosting Virginia, USA Oregon, USA On customer request: Dublin, Ireland Indonesia Sydney, Australia, UAE
Procurement Catalyst	Customer'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
Pulse -Risk Assessment Platform	Customer's end customers	Identifiers (e.g., name, address)	Cloudflare, Inc., USA – managed web application firewall

QUIQspread	Customer's customers	Identifiers (e.g., name)	Amazon Web Services, Inc. – cloud hosting Virginia, USA Dublin, Ireland Singapore, UAE Cognaize CSJC, Armenia – financial data AI processing Vol-Smart LLC, USA – financial data AI processing Cloudflare, Inc., USA – managed web application firewall
Reporting Studio	Customer's customers	Loan details (e.g., counterparty code, transaction ID)	Amazon Web Services, Inc. – cloud hosting Dublin, Ireland Singapore Sydney, Australia Cloudflare, Inc., USA – managed web application firewall
RMS - Analytical & Consulting Services, Claims & Exposure Analysis, Hosting Plus, Professional Services	Customer's customers	Property data (e.g., latitude/longitude coordinates, address, zip code), exposure data, policy information (e.g., policy number)	For IRP products: Microsoft – cloud hosting Ireland, Canada For Cloud Solutions: AWS (customer can choose Ireland or East US)
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)	Customer'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)	Amazon Web Services, Inc. – cloud hosting Virginia, USA Dublin, Ireland Snowflake, Inc., USA – data analytics Databricks, Inc., USA, – data analytics MapBox, Inc., USA - map visualization of location data
RMS - Miu	Customer'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	Customer's customers & suppliers	Identifiers (e.g., name, business contact details)	Amazon Web Services, Inc. - cloud hosting Frankfurt, Germany
Sanctions360	Customer'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	Customer's customers & suppliers	Identifiers (e.g., name), company information (e.g., role/title, ownership/shareholding percentage)	Amazon Web Services (us East: North Virginia)
Supply Chain Catalyst (with Multi-Tier Risk Visibility)	Customer'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 Altana Technologies, Inc. 25 Kent Ave, Suite 501, Brooklyn, NY 11249 – MTRV application & remote support services.

Tax Risk Catalyst	Customer'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 customer services

* 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 customer contract.