

EEA Regulated Entities Addendum

Date: September 22, 2025

| Purpose | Categories of Data Subjects and Personal Data | Legal Basis | Data Subject Rights | Retention Period |
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| <p>1. Personal data are processed to provide services and fulfil legal obligations under the Central Securities Depositories Regulation (CSDR) and related to Nasdaq central shares depositories (CSD) operations.</p> <p>Personal data are also processed to deliver public-facing websites and publicly available site accounts for Nasdaq CSD operations (such as the eServices platform, a web-based platform allowing issuers in the Baltics and Iceland with registered securities to interact with Nasdaq).</p> | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Personal identification, e.g. business and personal telephone number, full name, signature and personal email address. Government identifiers, e.g. passport number and national identification number. Unstructured data fields in which the customer can input any content. Browsing information, e.g. full IP address and browsing time. Employment information, e.g. company/entity and work contact information. Access information, e.g. IT systems access information (password stored in hash format) Financial information, e.g. bank account information. | <p>With regards to provision of the services, the legal basis for the processing of personal data is the existence of a legal obligation under the Central Securities Depositories Regulation (CSDR).</p> <p>With regards to delivering of websites, the legal basis for the processing of personal data is Nasdaq's legitimate interests. Nasdaq has concluded that processing the personal data is necessary in order to maintain business interests, e.g. administer customer/vendor relationships, prevent fraud, secure systems, and evidence performance of contract obligations, etc.</p> | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. Right to object to the processing of personal data (for processing that is based on legitimate interest). | <p>Personal data is retained for 10 years.</p> |

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| 2. Personal data are processed to manage current and prospect customer relationships, including onboarding/offboarding of members, membership management, user and account management, responding to customer inquiries, and informing customers about upcoming changes. | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, business telephone number, nationality, signature and long code. Government identifiers, e.g. national identification number, social security number and passport number. Unstructured data fields in which the customer can input any content. Browsing information, e.g. full IP address and partial IP address. Employment information, e.g. work contact information, business unit/division, company/entity, employee number and job title/role. Access information, e.g. username, username as email address, Nasdaq user ID and IT systems access information (password stored as plain text) Financial information, e.g. short code. Sales support or contact information, e.g. sales contact history and help desk/support contact history. Security, monitoring or fraud prevention related information, e.g. audio/video recordings. <p>Prospective customers</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, business telephone number, personal email address, signature and date of birth. Unstructured data fields in which the customer can input any content. Browsing information, e.g. full IP address. | The legal basis for the processing of personal data is Nasdaq's legitimate interest to provide support to the customers of the EEA Regulated Entities. Nasdaq has concluded that processing the personal data is necessary to manage current and prospect customer relationships, including onboarding/offboarding of members, membership management, user and account management, responding to customer inquiries, and informing customers about upcoming changes. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. Right to object to the processing of personal data. | Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information'). |

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| 3. Personal data are processed to deliver newsletters and other similar services for marketing purposes, including e-mail correspondence. | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Personal identification, e.g. full name. Employment information, e.g. company/entity, business unit/division, office location, job title/role and work contact information. <p>Prospective Customers</p> <ul style="list-style-type: none"> Personal identification, e.g. full name. Employment information, e.g. company/entity, job title/role and work contact information. | <p>The legal basis for the processing of personal data is Nasdaq's legitimate interest to conduct marketing. Nasdaq has concluded that processing the personal data is required in order to carry out marketing and communicate regarding its business.</p> <p>When personal data derives from emails containing opt-in or opt-out functionality, the legal basis for processing is consent.</p> | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. Right to object to the processing of personal data. Right to data portability. Right to withdraw consent. | <p>Personal data processed on the basis of legitimate interest will be retained according to the terms of this Privacy Policy (section 'Retention of Your Information')..</p> <p>Personal data processed on the basis of consent is retained according to the terms of this Privacy Policy (section 'Retention of Your Information') or until such earlier date on which the consent is withdrawn.</p> |
| 4. Personal data are processed to manage relationships with customers and prospect customers, including sales, business development, contracting and customer service/support. | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Employment information, e.g. company/entity, job title/role, office location, work contact information and line/reporting manager. Sales, support or contact information, e.g. sales contact history and help desk/support contact history. <p>Prospective Customers</p> <ul style="list-style-type: none"> Personal identification, e.g. full name. Sales, support or contact information, e.g. sales contact history, business contact details and help desk/support contact history. <p>Members of public</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, personal telephone number and persona email address. Sales, support or contact information, e.g. business contact details. Service provider (representatives or employees of Service provider) Employment information, e.g. company/entity and job title/role. Sales, support or contact information, e.g. business contact details. | <p>The legal basis for the processing of personal data is Nasdaq's legitimate interest to manage relationships with customers and prospect customers. Nasdaq has concluded that processing the personal data is required in order relationships with customers and prospect customers.</p> | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. Right to object the processing of personal data. | <p>Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information').</p> |

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| <p>5. Personal data, mainly relating to company officials and financial institution personnel, are processed to:</p> <ul style="list-style-type: none"> • receive and manage application for listing and monitor markets pursuant to obligations under MiFID and MAR; • maintain and change listing information; • remove listings from trading venues in order to fulfil legal obligations under MiFID II. | <p>Company representatives</p> <ul style="list-style-type: none"> • Personal identification, e.g. full name and signature. • Government identifiers, e.g. national identification number. • Employment information, e.g. company/entity and business unit/division. | <p>The legal basis for the processing of personal data is the existence of a legal obligation under MiFID II.</p> | <ul style="list-style-type: none"> • Right to lodge a complaint with the supervisory authority. • Right to information and access, including a copy of personal data. • Right to have inaccurate personal data rectified and incomplete personal data completed. • Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. • Right to restriction of processing. | <p>Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information').</p> |
| <p>6. Personal data are processed to manage customer and member defaults and are stored for regulatory purposes.</p> | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> • Personal identification, e.g. full name and business telephone number. • Access information, e.g. Nasdaq user ID. • Sales, support or contact information, e.g. business contact details. <p>Prospective customers</p> <p>Personal identification, e.g. full name and business telephone number.</p> <p>Sales, support or contact information, e.g. business contact details.</p> | <p>The legal basis for the processing of personal data is the existence of a legal obligation under the applicable laws and regulations.</p> | <ul style="list-style-type: none"> • Right to lodge a complaint with the supervisory authority. • Right to information and access, including a copy of personal data. • Right to have inaccurate personal data rectified and incomplete personal data completed. • Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. • Right to restriction of processing. | <p>Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information').</p> |
| <p>7. Personal data are processed to perform continued listing reviews pursuant to obligations under MiFID II.</p> | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> • Personal identification, e.g. full name, signature and date of birth. • Employment information, e.g. company/entity, business unit/division, job title/role and work contact information. • Security, monitoring or fraud prevention related information, e.g. sanctions/AML/administrative screening or history. | <p>The legal basis for the processing of personal data is the existence of a legal obligation under MiFID II.</p> | <ul style="list-style-type: none"> • Right to lodge a complaint with the supervisory authority. • Right to information and access, including a copy of personal data. • Right to have inaccurate personal data rectified and incomplete personal data completed. • Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. • Right to restriction of processing. | <p>Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information').</p> |

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| 8. Personal data are processed to perform market surveillance pursuant to obligations under MAR and MiFID II. | Members of public (anyone trading on Nasdaq exchanges): <ul style="list-style-type: none"> Personal identification, e.g. full name, nationality, address, date of birth and long code. Government identifiers, e.g. national identification number. Financial information, e.g. trading transaction and short code, trading history. Employment information, e.g. company/entity, business unit/division, job title/role and work contact information, company affiliations. Data relating to (suspected) criminal offences. Information regarding closely related persons, where applicable. | The legal basis for the processing of personal data is the existence of a legal obligation under MAR. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. | According to Art. 3(8) of the Delegated Regulation (EU) 2016/957, market operators shall, as part of the arrangements and procedures for monitoring, maintain for a period of five years the information documenting the analysis carried out with regard to orders and transactions that could constitute insider dealing, market manipulation or attempted insider dealing or market manipulation which have been examined and the reasons for submitting or not submitting a STOR. |

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| <p>9. Personal data are processed to keep available news and listed companies' disclosures, i.e. regulated information disclosed or published based on the EU and local legislation as well as applicable self-regulation.</p> | <p>Individuals representing the issuers listed on the regulated market, and individuals representing service providers of the issuers in connection to filing regulatory information:</p> <ul style="list-style-type: none"> • Personal identification, e.g. full name and business telephone number. • Employment information, e.g. company/entity, job title/role and office location. • Access information, e.g. IT systems access information (password stored in hash format), username and email address. • Sales, support or contact information, e.g. business contact details. <p>In addition, the stored regulatory information (disclosures) filed by the listed issuers may include various types of personal data as required by the applicable regulations, such as:</p> <ul style="list-style-type: none"> • information on the issuer's principles of diversity and information on working experience, previous positions, education, gender, age, domicile, family relations etc. of the members of boards, management, auditors or other bodies/persons of the listed issuers; • information on ownership and voting rights in listed security (names etc. of major shareholders) as well as detailed information on transactions of financial instruments (names etc. of persons discharging managerial responsibilities); • information on individual remunerations based on the positions of the person representing the listed issuer; • any other personal data as required by the applicable regulations. | <p>The legal basis for the processing of personal data is the existence of legal obligations under the applicable EU and local legislation (such as Securities Markets Act (746/2012), Commission Delegated Regulation (EU) 2017/568 with regard to regulatory technical standards for the admission of financial instruments to trading on regulated markets, Commission Implementing Regulation (EU) 2016/1055 laying down implementing technical standards with regard to the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information in accordance with Regulation (EU) No 596/2014).</p> | <ul style="list-style-type: none"> • Right to lodge a complaint with the supervisory authority. • Right to information and access, including a copy of personal data. • Right to have inaccurate personal data rectified and incomplete personal data completed. • Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. • Right to restriction of processing. | <p>The personal data will be retained for 5 years.</p> |

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| 10. Personal data are processed in connection with analysis and storing of audit documentation (audit workpapers and evidence) to fulfil legal obligations under the applicable laws and regulations. | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, business telephone number and long code. Employment information, e.g. company/entity and office location. Access information, e.g. username and username as email address. Financial information, e.g. short code. Sales, support or contact information, e.g. business contact details. Security, monitoring or fraud prevention related information, e.g. sanctions/AML/administrative screening history. <p>Service provider (representatives or employees of Service provider)</p> <ul style="list-style-type: none"> Personal identification, e.g. full name and business telephone number. Employment information, e.g. company/entity, job title/role and office location. Access information, e.g. username and username as email address. Sales support or contact information, e.g. business contact details. | The legal basis for the processing of personal data is the existence of a legal obligation. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. | The personal data is retained for 7 years. |

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| <p>11. Personal data are processed to provide shareholders/bondholders lists to, e.g., shareholders, bondholders, issuers, banks and authorities pursuant to legal obligations (related to Nasdaq central shares depositories (CSD) operations).</p> | <p>Shareholders/bondholders</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, nationality, date of birth, business telephone number, personal email and home address. Government identifiers, e.g. national identification number. Unstructured data fields in which the customer can input any content. Financial information, e.g. account information, bank account information and trading transaction. Browsing information, e.g. full IP address and browsing time. Access information, e.g. username, username as email address and IT systems access information (password stored in hash format). Security, monitoring or fraud prevention related information, e.g. sanctions/AML/administrative screening history and system usage session monitoring/recording. | <p>The legal basis for the processing of personal data is the existence of a legal obligation.</p> | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. | <p>The personal data is retained for as long as the natural person is a shareholder/bondholder.</p> |
| <p>12. Personal data are processed in connection with maintenance of the initial register to manage relationships with customers and/or prospect customers (related to Nasdaq central shares depositories (CSD) operations in Latvia only).</p> <p>The initial register is a list that includes individuals who own shares acquired as a result of the initial placement or that were not transferred from the initial register to the owners' financial instrument accounts after the bearer shares were registered at Nasdaq.</p> | <p>Customers (representatives or employees of Customers)</p> <ul style="list-style-type: none"> Personal identification, e.g. full name, date of birth and home address and customer personal code. | <p>The legal basis for the processing of personal data is Nasdaq's legitimate interest based on customer request.</p> | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. Right to object the processing of personal data. | <p>Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information').</p> |

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| 13. Personal data are processed to enable registration and/or login through the website's graphical user interface, to receive and administer requests for legal entity identifier (LEI) codes and to deliver public facing websites and publicly available site accounts, newsletters and other similar services (related to Nasdaq central shares depositories (CSD) operations). | Customers (representatives or employees of Customers) <ul style="list-style-type: none"> Personal identification, e.g. full name, business telephone number, personal telephone number and email address. Financial information, e.g. credit/debit card number. Browsing information, e.g. browsing time and cookie information. Access information, e.g. username and email address. Sales, support or contact information, e.g. business contact details. | The legal basis for the processing of personal data is Nasdaq's legitimate interest. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. Right to object the processing of personal data | The personal data will be retained for 10 years after the agreement with the Global Legal Entity Identifier Foundation (GLEIF) is terminated. |
| 14. Personal data is processed through offering of independent and secure registry maintenance services to private, non-listed joint stock companies with registered shares (related to Nasdaq central shares depositories (CSD) operations). | Customers (representatives or employees of Customers) <ul style="list-style-type: none"> Personal identification, e.g. full name, date of birth, home address and citizenship status. | The legal basis for the processing of personal data is Nasdaq's legitimate interest based on customer request. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. | Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information'). |
| 15. Personal data are processed in connection with the opening of new securities accounts for investors in accordance with legal obligations on the collection of personal data of account holders (related to Nasdaq central shares depositories (CSD) operations). | Member of public <ul style="list-style-type: none"> Personal identification, e.g. full name, nationality, date of birth, citizenship status, home address, personal telephone number, business telephone number and personal email address. Government identifiers, e.g. national identification number, passport number, driving license number and national identity card details. Financial information, e.g. brokerage account information, tax residency, cash account number and trading transaction. | The legal basis for the processing of personal data is the existence of a legal obligation. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. | Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information'). |

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| 16. Personal data are processed in connection with the performance of the saving notes service provided in Latvia (related to Nasdaq central shares depositories (CSD) operations). | Individual investors: <ul style="list-style-type: none"> Personal identification, e.g. full name, nationality, date of birth, citizenship status, personal telephone number, business telephone number, home address and personal email address. | Nasdaq processes personal data as a data processor based on the terms of the applicable data processing agreement with the data controller. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. | Personal data is retained according to the terms of the applicable data processing agreement with the data controller. |
| 17. Personal data are processed to conduct sanctions screenings and anti-financial crime screenings, to manage reputational and financial crime risks, to conduct counterparty diligence, and for monitoring and fraud prevention purposes. | Representatives, beneficial owners and shareholders of customers and prospective customers: <ul style="list-style-type: none"> Personal identification, e.g. full name, nationality, date of birth, citizenship status, gender identification, age, height, marital status, business telephone number, home address and signature. Government identifiers, e.g. national identification number, passport number, driving license number, social security number, national identity card details and image of any government issued ID. Unstructured data fields in which customers can input any content. Employment information, e.g. company/entity, business unit/division, job title/role, work contact information, previous work history, photo and office location. Education and skills information, e.g. education and training history Security, monitoring or fraud prevention related information, e.g. sanctions/AML/administrative screening or history. Professional experience and affiliations, e.g. political affiliation and activities. Social information, e.g. social media account. Background checks, e.g. criminal history, offences and convictions. | With the exception of the processing of personal data to conduct sanctions screening, which is based on the existence of a legal obligation under sanctions legislation, the legal basis for the processing of personal data is based on Nasdaq's legitimate interest to manage reputational and financial crime risks. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. <p>Right to object to the processing of personal data.</p> | <p>Personal data relating to anti financial crime screening will be retained for the duration of a business relationship and for 10 years after the business relationship has ended.</p> <p>Personal data relating to sanctions screening will be retained for 10 years.</p> |

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| 18. Personal data are processed in connection with the Estonian pension register in order to provide pension services (related to Nasdaq central shares depositories (CSD) operations). | Individual contributors <ul style="list-style-type: none"> Personal identification, e.g. full name, date of birth, gender identification, country of residence, disability or specific condition, personal telephone number and personal email address. Government identifiers, e.g. national identification number. Employment information, e.g. company/entity. Financial information, e.g. account information, trading transaction and bank account information. Education and skills information, e.g. languages. | Nasdaq processes personal data as a data processor based on the terms of the applicable data processing agreement with the data controller. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. | Personal data is retained according to the terms of the applicable data processing agreement with the data controller. |
| 19. Personal data from the Latvian State Social Insurance Agency are processed in order to provide pension services in Latvia (related to Nasdaq central shares depositories (CSD) operations). | Individual contributors <ul style="list-style-type: none"> Personal identification, e.g. full name, date of birth, citizenship status, home address, previous residence address, age and personal telephone number. | Nasdaq processes personal data as a data processor based on the terms of the applicable data processing agreement with the data controller. | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure. Right to restriction of processing. | Personal data is retained according to the terms of the applicable data processing agreement with the data controller. |
| 20. Personal data are processed to check holdings upon request from third parties (notaries, bailiffs or courts), pursuant to legal obligations under the Central Securities Depositories Regulation (related to Nasdaq central shares depositories (CSD) operations). | Customers (representatives or employees of Customers) <ul style="list-style-type: none"> Personal identification, e.g. full name and date of birth. Government identifiers, e.g. national identification number. | The legal basis for the processing of personal data is the existence of a legal obligation under the Central Securities Depositories Regulation (CSDR). | <ul style="list-style-type: none"> Right to lodge a complaint with the supervisory authority. Right to information and access, including a copy of personal data. Right to have inaccurate personal data rectified and incomplete personal data completed. Right to erasure, unless, e.g., the processing is necessary for compliance with a legal obligation. Right to restriction of processing. | Personal data is retained according to the terms of this Privacy Policy (section 'Retention of Your Information'). |