Third Financial approved sub-processors

Approved sub-processors of personal data

This register lists the current third-party sub-processors approved to process personal data on our behalf. The list is reviewed and updated periodically to support transparency, accountability and oversight under applicable Data Protection laws. Should you have any questions please contact dataprotection@nucleusfinancial.com

Last updated: September 2026

Sub-processor name	Service provided	Processing activity	Categories of personal data processed	Categories of data subjects	Processing location(s)
Atlassian (UK) Limited	SaaS	Operational workflows, issues tracking.	Contact details	Advisers and customers	EU (Frankfurt and Dublin)
Dunstan Thomas Holdings Limited	Imago tooling and support services	Provide support and illustration services in respect of the financial products on the Platform	Financial information	Advisers and customers	UK

Sub-processor name	Service provided	Processing activity	Categories of personal data processed	Categories of data subjects	Processing location(s)
Qomply Limited	Compliance monitoring and analytics services	Support regulatory reporting, surveillance and oversight functions.	Contact details and financial information	Customers	Germany
London Stock Exchange plc	Market Data and Regulatory Reporting Service	Provision of equity listing, admission to trading, and ongoing regulatory compliance and disclosure services	Name, address, financial information	Customers	UK
Microsoft Corporation (Microsoft Azure)	Data Centres, Microsoft 365	Hosting services, Office Software	Name, contact details, DOB, financial data, account data	Advisers and their customers	UK
BT Cloud Voice	Phone System	Call recordings	Varying dependant on call content	Advisers and possibly customer details if disclosed in calls	UK
Intelliflo Limited/Wealth Dynamics Limited	CRM Software	CRM	Names, contact details, financial information	Advisers and their customers	UK
Woven Advice Limited/Contengo Ltd	Wealth Technology and Asset Migration	Facilitating bulk client asset migrations	Names, contact details, financial information	Advisers and their customers	UK

Sub-processor name	Service provided	Processing activity	Categories of personal data processed	Categories of data subjects	Processing location(s)
SmartCredit Limited (SmartSearch)	Electronic Verification, Anti-Money Laundering (AML), and Know Your Customer (KYC) Compliance Platform	Fulfilling statutory anti-money laundering obligations, identity validation, sanctions and PEP screening, and ongoing client risk monitoring.	Name, address, DOB, ID documents	Customers	UK
QI Solutions	IRS Returns	Completion of US tax returns for US based clients	Name, contact details, financial information	US based customers	Switzerland/USA
Origo Secure Internet Services Limited	Transfer services	Transfer services ISAs, GIAs and SIPPs	Name, contact details, financial information	Customers	UK
Nucleus Group companies	Intra-group operational support services including Group Finance, Legal, Compliance and Risk.	Support Third Financial services, systems and business functions.	Names, contact details, account, financial, transaction, communications, identifier and support data.	Advisers, customers.	UK
Security service providers	Security monitoring, threat detection, vulnerability management,	Limited processing of personal data where required to protect systems, investigate	Adviser and customer personal data is not routinely processed and may only be	Advisers and customers may be included only incidentally where	UK, EEA - other locations subject to appropriate transfer

Sub-processor name	Service provided	Processing activity	Categories of personal data processed	Categories of data subjects	Processing location(s)
	penetration testing, incident response support and related cyber-security services	security events, identify vulnerabilities, monitor malicious activity and support incident response	processed incidentally where it appears in security monitoring, detection, testing or incident investigation data.	their personal data appears in security logs, monitoring outputs or incident records.	safeguards where required
Financial institutions, investment counterparties, custodians, banks, life companies and SIPP providers	Investment, custody, banking, settlement, pension administration and related financial services	Support the operation of products and services made available through the platform, including transaction settlement, asset custody, payments, pension administration, reconciliation, reporting and related operational support. Processing may be limited to omnibus, aggregated or non-personal data; personal data is only processed where required to provide the relevant service	Where applicable: name, account or portfolio reference, transaction details, holdings, payment details, tax information and other financial information. In many cases only omnibus, aggregated or non-personal data is processed	Advisers and their customers	UK and EEA; other locations subject to appropriate transfer safeguards where required.

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		or meet legal or regulatory obligations.			
Software development and app diagnostics tools	Development, testing, issue tracking and crash analytics tools	Support platform and mobile app development, troubleshooting and crash analysis.	User IDs, device/app data, crash logs, technical metadata and limited data in tickets or test records.	Advisers and their customers	UK/EEA
Operational improvement consultancy providers	Consultancy, process improvement, automation and operational support	Support operational review, service improvement and change initiatives.	Personal data may be processed where required to assess or improve processes and services.	Advisers and their customers	UK and EEA; other locations subject to appropriate transfer safeguards where required.

“Third Financial” is the trading name of Third Financial Software Ltd (TFS) (registered in England, number 06448163) whose registered office is at 8th Floor, Centennium House, 100 Lower Thames Street, London EC3R 6DL. TFS is a member of a VAT group with VAT registration number 514 0358 80. TFS is a wholly owned subsidiary of Nucleus Financial Platforms Limited (registered in England, number 06033126) whose registered office is at Suite B & C, First Floor, Milford House, 43-55 Milford Street, Salisbury SP1 2BP, and is a member of the Nucleus Group. Further details of the Nucleus Group can be found at nucleusfinancial.com. (10/25)