



# DATA PRIVACY NOTICE – CLIENTS WITH ACCOUNTS IN SWITZERLAND RESIDING IN FOREIGN COUNTRIES

## Data protection under the Data Protection law of the European Union, Brazil, New Zealand, China, Turkey, Singapore and Saudi Arabia.

UBS takes your privacy seriously. This Privacy Notice (“**Notice**”) contains information on what Personal Data UBS (“**UBS**”, “**we**”, “**our**”, or “**us**”) and other companies of the group to which we belong (the “**UBS Group**”) collect(s), what we do with that information, and what rights you have.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you:

- why and how UBS collect, treats and stores your Personal Data;
- the lawful basis on which your Personal Data is processed; and
- what your rights and our obligations are in relation to such processing.

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### 1 What does this Privacy Notice cover?

This notice applies to any and all forms of use of Personal Data (“**processing**”) by us if you are a former, current or prospective client of any of the UBS entities in Switzerland listed in Section 10.

### 2 What types of Personal Data do we collect?

For prospective clients with whom we have not yet made contact, we may collect (to the extent permitted by applicable law):

- personal identification details (such as name, address, gender, nationality), contact information (such as telephone, e-mail address), and family details (such as marital status);
- information related to the professional profile (such as directorship / positions and professional networks) and information related to company ownership and financial background.



For former and current clients or prospective clients with whom we are taking steps to enter into a business relationship, we collect (to the extent permitted by applicable law):

- personal details such as your name, identification number, date of birth, compliance related documents (including a copy of your national identity card or passport), phone number, address and domicile, electronic address, and family details such as the name of your spouse, partner or children;
- financial information, including payment and transaction records and information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where relevant, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use, including electronic interactions across various channels such as e-mails and mobile applications;
- any records of phone calls between you and UBS, specifically phone log information such as your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, contract, partner or account number, including identifiers for accounting purposes;
- when you access UBS websites or some of our applications, your activity in our products and services, data transmitted by your browser or device you are using and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your device, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our website if their disclosure is made voluntarily, e.g., in the course of a registration or request); and
- in some cases (where permitted by law), special categories of Personal Data, such as your biometric information (including behavioural data such as logs of your keystrokes when you access UBS applications), political opinions or affiliations, health information, racial or ethnic origin, religious or philosophical beliefs, and, to the extent legally possible, information relating to criminal convictions or offences.

We may use cookies, tracking technologies and other means (e.g., web beacons, pixels, gifs, tags, unique identifiers) to collect and process the above information from different channels and devices you use, including e-mail and devices that you use to interact with us to access UBS websites, UBS platforms, products, services and applications for mobile devices. For our usage of cookies and other tracking technologies in relation to UBS websites please also refer to the UBS Website, Social Media and Cookie Notice available [here](#).

We may use Personal Data for analytics and measurement (incl. machine learning) to process the above information, including profiling based on the processing of your Personal Data, for instance by looking at information we obtain via cookies and tracking technologies.

In some cases, we collect this information from public registers (which, depending on the product or service you receive and the country of the UBS entity with which you have a business relationship, may include beneficial ownership and other registers), public administration or other third-party or public sources, such as wealth screening services, credit reference agencies, fraud prevention agencies, intermediaries that facilitate data portability, and other UBS Group entities. If relevant to the products and services we provide to you, we will also collect information about your additional card holders or account holders, business partners (including other shareholders, or beneficial owners), dependents or family members, representatives, or agents. Where you are an institutional or corporate client or investor, we may also collect information about your directors, representatives, employees, shareholders or beneficial owners. Before providing UBS with this information, you should inform those persons accordingly and provide a copy of this notice to them.

### **3 For which purposes do we process your Personal Data and what legal basis do we rely on?**

#### **3.1 Purposes of processing**

We always process your Personal Data for a specific purpose and only process the Personal Data which is relevant to achieve that purpose. In particular, we process Personal Data, within applicable legal limitations, for the following purposes:

- a) Client Onboarding:
  - to verify your identity and assess your application (including the need for guarantees or other securitisation tools if you apply for credit). For legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud), please see Section e) below.
- b) Client Relationship Management:
  - to manage our relationship with you, including communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints, facilitating debt recovery activities, making decisions regarding credit or your identity, tracing your whereabouts, and closing your account (in accordance with applicable law) if it remains dormant and we are unable to contact you after a period of time;
  - to help us to learn more about you as a client, your preferences on the products and services you receive, and other products and services, including those offered by us, UBS Group entities, and our business partners you may be interested in receiving, including profiling based on the processing of your Personal Data, for instance by looking at the types of applications, platforms, products and services that you use from us, information we obtain via tracking technology and how you like to be contacted;
  - to collect and analyse your individualised and personal or anonymous and group-based activity and potential interests in the use of our products and services, of UBS websites, our applications for mobile devices and UBS platforms, multimedia portals and social networks.
- c) Product implementation and execution:
  - to provide products and services to you and ensuring their proper execution, for instance by ensuring that we can identify you and make payments to and from your accounts in accordance with your instructions and the product terms;
  - to provide IT solutions to you and ensure their proper execution in accordance with your instructions and our contractual arrangements with you, for instance by providing incident management and testing directly connected to the provision of the service, or by supporting your controller obligations regarding Personal Data storage, legal and regulatory compliance, audit activity and investigations;
  - to perform underwriting.
- d) Engaging in prospecting and business development and / or protecting and enhancing the UBS brand:
  - to evaluate whether and how UBS may offer products, services and events, including those offered by us, UBS Group entities, and our other business partners, that may be of interest to you;
  - to individualised and personal or anonymous and group-based matching of offers on UBS websites, on our applications for mobile devices, on UBS platforms, on multimedia portals and social networks and other UBS products and services you may use;
  - to contact you for direct marketing purposes about products and services we think will be of interest to you, including those offered by us, UBS Group entities, and our other business partners, and facilitating competitions and promotions.

- e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation:
- to carry out legal and regulatory compliance checks in particular as part of the onboarding process and periodic compliance checks, including to comply with anti-money laundering regulations and fraud prevention;
  - to meet our on-going regulatory and compliance obligations (e.g., laws of the financial sector, anti-money laundering and tax laws), including in relation to recording and monitoring communications, apply a risk classification to ongoing business relationships, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime;
  - to receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
  - to reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority.
- f) Supporting, Enhancing and Maintaining UBS's technology:
- to take steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing products and services or learn about other products and services we can provide;
  - to analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.
- g) Other purposes:
- for the UBS Group's prudent operational management (including credit, compliance and risk management, technological support services, reporting, insurance, audit, systems and products training and administrative purposes);
  - to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of UBS's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
  - to collect data to ensure the security of buildings, the safety of staff and visitors, as well as property and information located, stored on or accessible from the premises, to prevent, and if necessary, investigate unauthorized access to secure premises (e.g., maintaining building access logs and CCTV system images to prevent, detect and investigate a theft of equipment or asset owned by UBS, visitor or staff, or threats to the safety of personnel working at the office);
  - to undertake transactional and statistical analysis, and related research; or
  - to exercise our duties and/or rights vis-à-vis you or third parties.

### **3.2 Legal basis for processing of Personal Data**

Based on the Data Protection Law of your country of domicile and depending on the purpose of processing activity (see Section 3.1.), we are relying on certain legal basis for the processing of your Personal Data. For further details, please refer to the annex dedicated to the country you are domiciled in:

- EU (Annex I, page 9)
- Brazil (Annex II, page 12)
- New Zealand (Annex III, page 14)
- China (Annex IV, page 15)
- Turkey (Annex V, page 17)
- Singapore (Annex VI, page 20)
- Saudi Arabia (Annex VII, page 21)

### **4 How do we protect your Personal Data?**

All UBS employees accessing Personal Data must comply with our internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality.

UBS and the UBS Group have also implemented adequate technical and organisational measures to protect your Personal Data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

### **5 Who has access to Personal Data and with whom are they shared?**

#### **5.1 Within UBS Group**

We usually share Personal Data with other UBS Group companies, for the purposes indicated in Section 3.1, to ensure a consistently high service standard across our group, and to provide services and products to you. Other companies of the UBS Group may process your Personal Data on behalf and upon request of UBS.

#### **5.2 Outside UBS and the UBS Group**

##### **5.2.1 Third Parties**

We transfer Personal Data to other credit and financial services institutions and comparable institutions and to our professional advisers and consultants to perform the business relationship with you. In particular, when providing products and services to you, we will share Personal Data with persons acting on your behalf or otherwise involved (depending on the type of product or service you receive from us), including, where relevant the following types of companies:

- a party acquiring interest in, or assuming risk in or in connection with, the transaction (such as an insurer);
- credit card associations, and other card payment and platform providers;
- issuers of securities (including third parties appointed by them) in which you have an interest, where such securities are held by third party banks for you;
- payment recipients, beneficiaries, account nominees, intermediaries, correspondent and agent banks (including custodian banks);
- clearing houses, and clearing or settlement systems and specialised payment companies or institutions such as SWIFT;
- market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges;
- other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references);

- any third-party fund manager who provides asset management services to you;
- any introducing broker to whom we provide introductions or referrals, and
- lawyers, auditors, accountants, and insurers providing legal, audit, consultancy, accounting or insurance services to us.

### **5.2.2 Service Providers**

In some instances, we also share Personal Data with our suppliers, who are contractually bound to confidentiality, such as IT hardware, software and outsourcing providers, logistics, mail, courier, printing services and storage providers, marketing and communication providers, facility management companies, market data service providers, transportation and travel management providers and others. When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure.

Where UBS transfers your data to service providers processing data on UBS behalf, we take steps to ensure they meet our data security standards, so that your Personal Data remains secure. Service providers are thereby mandated to comply with a list of technical and organisational security measures, irrespective of their location, including measures relating to: (i) information security management; (ii) information security risk assessment and (iii) information security measures (e.g., physical controls; logical access controls; malware and hacking protection; data encryption measures; backup and recovery management measures).

### **5.2.3 Public or regulatory authorities**

If required from time to time, we disclose Personal Data to public authorities, regulators or governmental bodies, courts or party to proceedings, where we are required to disclose information by applicable law or regulation, under a code of practice or conduct, at their request, or to safeguard our legitimate interests.

### **5.2.4 Others**

- We may need to disclose Personal Data to exercise or protect legal rights, including ours and those of our employees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others;
- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of UBS's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- Any other legitimate recipient required by applicable laws or regulations.

### **5.3 Data transfers to other countries**

The Personal Data transferred within, or outside UBS and the UBS Group as set out in Sections 5.1 and 5.2, is in some cases also processed in other countries. We only transfer your Personal Data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission or another statutory exemption) provided by local applicable law. We may also have to transfer data to the competent authority in your country of residence as explained above in section 5.2.3.

A copy of these measures can be obtained by contacting the Group Data Protection Office. If and to the extent required by applicable law, we implement the necessary legal, operational and technical measure and/or enter into an agreement with you before such transfers.

A list of the countries in which UBS and the UBS Group operate can be found [here](#).

## **6 How long do we store your data?**

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on its purpose. In general, although there may be limited exceptions, data is kept for the time period defined in the UBS Records Management Policy.



As far as necessary, we will keep your data for the duration of our banking relationship subject to applicable legal and regulatory requirements. In addition, we might process your data after the termination of our banking relationship for compliance or risk management in accordance with the applicable laws as well as pursuant to various retention and documentation obligations or if it is in UBS' legitimate interest.

Due to requirements laid down by the Swiss Financial Market Supervisory Authority ("FINMA"), UBS is also obliged to record external and internal telephone calls of all employees engaged in securities trading. UBS must furthermore store all electronic correspondence (e-mails, communication via Bloomberg or Reuters, etc.) and evidence of the calls made on business telephones by these employees for a period of two years. The bank must also make this information available to FINMA on demand. This applies also to employees identified by a risk-based assessment as being highly exposed to information that has relevance to market supervision.

In general, UBS will retain personal data for the period of the relationship or contract with UBS plus 10 years, reflecting the length of time for which legal claims may be made following the termination of such relationships or contract.

If you wish to have your Personal Data removed from our databases, you can make a request as described in Section 7 below, which we will review as set out therein.

## **7 What are your rights and how can you exercise them?**

### **7.1 Your rights**

Your rights regarding your Personal Data that we process can be found in the annex dedicated to the country you are domiciled in.

In certain circumstances UBS may process your personal data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision-making carried out and that a natural person review related decisions where such a decision is exclusively based on such processing.

### **7.2 Exercising your rights**

To exercise the above rights, please:

- For UBS Switzerland AG contact Quality Feedback / Direktion, Postfach, 8098 Zürich, Switzerland. To avoid delay in dealing with your request, please enclose with your signed letter a copy of your passport or identity card;

If you are not satisfied with how UBS processes your Personal Data, please let us know and we will investigate your concern. Please raise any concerns by contacting the UBS Group Data Protection Office at [dpo-ch@ubs.com](mailto:dpo-ch@ubs.com). If you are not satisfied with UBS's response, you have the right to make a complaint to the Data Protection Authority.

## **8 Changes to Personal Data**

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please inform us of the change as soon as possible.

## **9 Updates to this Notice**

This Notice was updated in May 2023. We reserve the right to amend it from time to time. Any amendment or update to this Notice we will make available to you [here](#). Please visit the UBS website frequently to understand the current Notice, as the terms of this Notice are closely related to you.



## 10 UBS Entities in Switzerland covered by this Notice

The provisions herein apply to you if you are a resident in a foreign country listed above (see page 1) and have a contractual relationship with the following UBS entities in Switzerland:

| Entity Name        | Registered Address                           |
|--------------------|--|
| UBS Switzerland AG | Bahnhofstrasse 45, Zürich, 8001, Switzerland |

### 10.1 EU representative for UBS Switzerland AG

UBS Switzerland AG designated the below UBS entity as the EU representative in compliance with Art. 27 EU GDPR.

| EU Representative Entity | Registered Address   |
|--------------------------|--|
| UBS Europe SE            | Bockenheimer Landstrasse 2-4, 60306 - Frankfurt am Main, Germany |

### 10.2 China representative for UBS Switzerland AG

UBS Switzerland AG designated the below UBS entity as the PRC based representative in compliance with Art. 53 PIPL.

| China based Representative Entity | Registered Address   |
|-----------------------------------|--|
| UBS Business Solutions China      | Room 301-304, 601-602, 488 Middle Yin Cheng Road, Pudong New District, Shanghai, 200120, China |

### 10.3 Turkey Data Controller representative for UBS Switzerland AG

UBS Switzerland AG appointed the below Law Firm as the Turkey based Data Controller representative in compliance with the local Data Protection Law.

| Data Controller | Registered Address and Contact Details  |
|-----------------|---|
| Eryürekli       | Telephone: (+90) 0 212 365 9600<br>E-mail: <a href="mailto:verbis-ubs@eryurekli.com">verbis-ubs@eryurekli.com</a><br>Address: Maslak Mah. A.O.S. 55. Sok. No:2, 42 Maslak A Blok D.244, 4485 Sarıyer Istanbul |

If you have any questions or comments about this Notice, please contact the Group Data Protection Office at [dpo-ch@ubs.com](mailto:dpo-ch@ubs.com).



## ANNEX I – EU

### Data protection under the EU General Data Protection Regulation (EU GDPR)

This appendix applies to any and all forms of use of the Personal Data of Clients domiciled in the EU by UBS Switzerland AG.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

#### 1 Legal basis for the processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract, such as when we use your data for some of the purposes in Section 3.1 a) and c) above;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks and make the disclosures to authorities, regulators and government bodies such as when we use your data for some of the purposes in Section 3.1 e) and g) above;
- in some cases, necessary for the performance of a task carried out in the public interest;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose (such as when we use your data for some of the purposes in Section 3.1 a), b), d), e), f) and g). See below for more examples of legitimate interests of UBS); or
- in limited circumstances, and as may be requested from you from time to time, we have obtained prior consent (for instance where required by law) or processed with your explicit consent in the case of special categories of Personal Data (such as your biometric data).

Examples of the “legitimate interests” referred to above are:

- manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving (see Section 3.1 b) above);
- evaluate whether and how UBS may offer products, services and events that may be of interest to you (see Section 3.1 d) above);
- prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of UBS premises (see Section 3.1 e) and g) above);
- receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group (see Section 3.1 e) above);
- take steps to improve our products and services and our use of technology and to conduct market research (see Section 3.1 f) above);
- to cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority (see Section 3.1 e) above);



- certain situation when we make the disclosures referred to in Section 5 below, providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our clients, employees and other stakeholders satisfied; and
- exercising our rights under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property;

in each case provided such interests are not overridden by your privacy interests.

To the extent UBS has obtained your consent to process ordinary Personal Data in the past in any product-specific terms and conditions for the purposes of data protection law only, UBS will no longer rely on such consent, but instead will rely on lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this Notice), and UBS' ability to rely on that consent is hereby waived or extinguished. For the avoidance of doubt, any consent given for any other reason, for instance (and if applicable) e-Privacy (including direct marketing), banking secrecy, decisions based solely on automated processing remains unaffected by this paragraph.

Where the Personal Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

To the extent that we process any special categories of data relating to you, we will do so because:

- the processing is necessary for the establishment, exercise or defense of a legal claim;
- the processing is necessary for reasons of substantial public interest;
- the processing relates to personal data which are manifestly made public by you; or
- you have given your explicit consent to us to process that information (where legally permissible).

## **2 What are your rights and how can you exercise them?**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information, we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- object to the processing of your Personal Data;
- request the erasure of your Personal Data;
- request restriction on the processing of your Personal Data; and/or
- withdraw your consent where UBS obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

When Personal Data is processed for direct marketing purposes, your right to object extends to direct marketing, including profiling to the extent it is related to such marketing. You may object to direct marketing by clicking the "unsubscribe" link in any of our emails to you, or by emailing us at the address indicated in Section 10 at any time.

Where we process your Personal Data based on your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your Personal Data be transferred to you (known as the 'data portability' right). You also have the right to ask UBS for information regarding some or all of the Personal Data we collect and process about you.

UBS will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.



In certain circumstances UBS may process your Personal Data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision making carried out and that a natural person reviews the related decision where such a decision is exclusively based on such processing.

If you are not satisfied with UBS' response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work. The contact details of each Data Protection Authority can be found at the following website: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## ANNEX II – BRAZIL

### **Data protection under the Brazil Personal Data Protection Law (Lei Geral de Proteção de Dados, LGPD)**

This appendix applies to any and all forms of use of the Personal Data of Clients domiciled in Brazil by UBS Switzerland AG.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

#### **1 Legal basis for the processing of Personal Data**

Depending on the purpose of the processing activity (see Section 3.1 above), the legal basis for the processing of your Personal Data will be one of the following:

- necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks and make the disclosures to authorities, regulators and government bodies;
- necessary for the regular exercise of our rights, including in judicial, administrative or arbitration proceedings;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose. See below for more examples of legitimate interests of UBS); or
- in some cases, and as may be requested from you from time to time, we have obtained prior consent (for instance where required by law) or processed with your explicit consent in the case of sensitive Personal Data.

Examples of the “legitimate interests” referred to above are:

- manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving;
- evaluate whether and how UBS may offer products, services and events that may be of interest to you;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of UBS premises;
- to receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
- to take steps to improve our products and services and our use of technology and to conduct market research;
- to cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
- certain situation when we make the disclosures referred to in Section 5 below, providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our clients, employees and other stakeholders satisfied.

in each case provided such interests are not overridden by your privacy interests.



Where the Personal Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

To the extent that we process any sensitive Personal Data relating to you, we will do so because:

- the processing is necessary to carry out our obligations under local laws requiring such processing, such as Anti Money-Laundering;
- the processing is necessary for our regular exercise of rights, including in judicial, administrative and arbitration proceedings;
- the processing is necessary for the protection of your life or physical security or of another natural person;
- the processing is necessary for the prevention of fraud and your safety, in processes of identification and authentication of registration in electronic systems, provided that your fundamental rights and liberties requiring protection of your personal data do not prevail;
- the processing relates to Personal Data manifestly in the public domain; or
- you have given your specific consent to us to process that information (where legally permissible).

## **2 Your rights under LGPD**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- request anonymization, blocking or elimination of unnecessary or excessive Personal Data, or of data that is not processed in compliance with LGPD;
- request the erasure of your Personal Data based upon consent;
- request the disclosure of sub-processors and other parties with whom Personal Data is shared;
- request information about consent choices and the consequences of refusing consent where UBS seeks to rely on your consent as a lawful ground for processing your Personal Data;
- withdraw your consent where we obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal); and
- request your Personal Data be transferred to you (known as the 'data portability' right).

UBS will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

In certain circumstances UBS may process your Personal Data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision making carried out and that a natural person reviews the related decision where such a decision is exclusively based on such processing.

If you are not satisfied with UBS' response, you have the right to make a complaint to the data protection authority in Brazil.



## ANNEX III – NEW ZEALAND

### **Data protection under the New Zealand Privacy Act 2020**

This appendix applies to any and all forms of use of the Personal Data of Clients domiciled in New Zealand by UBS Switzerland AG.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- what your rights are in relation to such processing and how you can exercise them.

#### **1 Your rights under the New Zealand Privacy Act 2020**

You have a right to access and to obtain information regarding your Personal Information that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Information.

You also have the right to:

- request the erasure of your Personal Information; and
- request for information on the identities or types of third parties with whom your Personal Information is shared.

We will honour such requests, but these rights are not absolute: they do not always apply and exemptions/exceptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

If you are not satisfied with UBS's response, you have the right to make a complaint to the Data Protection Authority. The contact details of the Data Protection Authority can be found at the following website:

<https://www.privacy.org.nz/>.

## ANNEX IV – CHINA

### Data protection under the Personal Information Protection Law (PIPL)

This appendix applies to any and all forms of use of the Personal Data of Clients domiciled in China by UBS Switzerland AG.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

#### 1 Legal basis for the processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Information will be one of the following:

- necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract, such as when we use your data for some of the purposes in Section 3.1 a) and c) above;
- necessary to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks and make the disclosures to authorities, regulators and government bodies referred to in Section 3.1 e) above;
- processing relates to the personal information made publicly available by you or otherwise lawfully made publicly available within a reasonable scope and in accordance with PIPL;
- where we have obtained your prior consent, or where we have obtained your separate consent (where required by law) such as in the case of transferring Personal Information cross-border, providing Personal Information to third party personal information processors (as defined by the PIPL), and processing sensitive Personal Information.

Where the Personal Information we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Information there is a possibility, we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

#### 2 Your rights under the PIPL

You have a right to request explanation of processing rules, to consult and to copy your Personal Information that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Information. You also have the right to:

- be informed on the processing of your Personal Information;
- request the erasure of your Personal Information;
- restrict or prohibit the processing of your personal information;
- refuse to receive any commercial advertisements based on your Personal Information;
- request for a copy of your Personal Information and, if technically feasible, to directly transmit a copy of your Personal Information to a third party designated by you;
- request information about consent choices and the consequences of refusing consent where UBS seeks to rely on your consent as a lawful ground for processing your Personal Information; and
- withdraw your consent where UBS obtained your consent to process Personal Information (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).



In certain circumstances UBS may process your Personal Information through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Information and be given information on criteria and procedures applied. You can request an explanation about the automated decision making carried out and request that a natural person reviews the related decision where such a decision is exclusively based on such processing.

UBS will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.



## ANNEX V – TURKEY

### **Data protection under the Turkish “Law on protection on Personal Data”**

This appendix applies to the use of client Personal Data originating from and collected in Turkey and processed by UBS Switzerland AG to the extent a UBS office was involved in the transfer of such data from Turkey to Switzerland.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- methods of collecting personal data,
- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

#### **1 Methods of collecting Personal Data**

When collecting personal data, UBS does so either in an automated or manual manner (e.g., filling out a form) followed by a manual or automated entry to a system as well as automatic archiving of data (e.g. phone calls).

#### **2 Legal basis for the processing of Personal Data**

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary for taking steps to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract;
- permitted under applicable laws such as when we conduct the legal compliance checks and make the disclosures to authorities, regulators and government bodies;
- required for the establishment, exercise, or protection of certain rights;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose. See below for more examples of legitimate interests of UBS); or
- as may be requested from you from time to time, we have obtained your explicit consent.

Examples of the “legitimate interests” referred to above are:

- manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving;
- evaluate whether and how UBS may offer products, services and events that may be of interest to you;
- prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of UBS premises;
- receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
- take steps to improve our products and services and our use of technology and to conduct market research;



- to cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority; and
- certain situation when we make the disclosures referred to in Section 5 below, providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our clients, employees and other stakeholders satisfied;

in each case provided such interests are not overridden by your privacy interests.

Where the Personal Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility, we may be unable to onboard you as a client or provide products or services to you (in which case we will inform you accordingly).

To the extent that we process any special categories of Personal Data relating to you, we will do so:

- to the extent such processing is expressly permitted by law; or
- the processing is necessary for our regular exercise of rights, including in judicial, administrative and arbitration proceedings; or
- you have given your explicit consent to us to process that information, in particular in case of health data.

### **3 What are your rights and how can you exercise them?**

You have a right to learn whether we process your Personal Data, to demand information regarding your Personal Data that we process, to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose.

If you believe that any information, we hold about you is incorrect, inaccurate or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- know the third parties to whom your personal data is transferred in country or abroad;
- request the erasure or destruction of your Personal Data under certain conditions;
- request reporting of the operations carried out to third parties to whom your personal data has been transferred,
- object to the occurrence of a result against you by analyzing the data processed solely through automated systems; and
- claim compensation for damage arising from the unlawful processing of your personal data.

UBS will honour such requests, withdrawal or objection as required under applicable data protection rules, but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

If you are not satisfied with UBS' response, you have the right to make a complaint to the Turkish Data Protection Authority.

## ANNEX VI – SINGAPORE

### Data protection under the Singapore Personal Data Protection Act (PDPA)

This appendix applies to any and all forms of use of the Personal Data of Clients domiciled in Singapore by (i) UBS in Switzerland, (ii) by our affiliates and (iii) by third parties approved by us.

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you about:

- the lawful basis on which your Personal Data is processed; and
- what your rights and our obligations are in relation to such processing.

#### 1. Legal basis for the processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary to perform our contractual obligations towards you or to enter into or conclude a contract with you or for carrying out our obligations under such a contract;
- necessary to comply with our legal or regulatory obligations that are required by law, such as tax reporting requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as responding to an emergency that threatens the health or safety of the individual or another natural person;
- necessary for business improvement purposes to the extent permitted under the PDPA, such as to improve new processes for business operations in relation to UBS's services;
- where we have obtained your prior consent;
- necessary for one or more of the specific purposes deemed by law to be in the legitimate interests of organisations (PDPA, First Schedule, Part 3, Para 2-10 - "Prescribed Legitimate Interests"). Some of these Prescribed Legitimate Interests which are necessary for UBS include the following:
  - i. for investigation or proceedings (including the establishment, exercise or defence of a legal claim);
  - ii. for UBS to obtain legal services.; or;
- necessary for the general legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms (PDPA, First Schedule, Part 3, Para 1- "General Legitimate Interests"). Examples include processing necessary to:

- i. manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving (with the exception of direct marketing, i.e., sending of unsolicited marketing material for which we would obtain your consent);
- ii. evaluate whether and how UBS may offer products, services and events that may be of interest to you;
- iii. prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of UBS premises;
- iv. receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
- v. take steps to improve our products and services and our use of technology and to conduct market research;

- vi. cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
- vii. make disclosures for the purposes referred to in Section 5 below, such as providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our clients, employees and other stakeholders satisfied.

## **2. Your rights under the Singapore Personal Data Protection Act**

### **2.1 Your rights**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data. You also have the right to withdraw your consent where UBS obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

UBS will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better.

If we do not comply with your request, we will explain why. If you are not satisfied with UBS's response, you have the right to make a complaint to the Data Protection Authority. The contact details of the Data Protection Authority can be found at the following website: <https://www.pdpc.gov.sg>.

## ANNEX VII – SAUDI ARABIA

### **Data protection under the Personal Data Protection Law (PDPL)**

This appendix applies to any and all forms of use of the Personal Information of clients domiciled in Saudi Arabia by us.

As part of our commitment to protect your Personal Information in a transparent manner, we want to inform you about:

- the lawful basis on which your Personal Information is processed; and
- what your rights and our obligations are in relation to such processing.

#### **1. Legal basis for the processing of Personal Information**

For most of the purposes of our processing activities, the legal basis for the processing of your Personal Data will be your consent.

We equally process your Personal Data where needed to meet our legal or regulatory obligations or in order to perform an agreement we have with you.

If we cannot collect this Personal Data there is a possibility we may be unable to on-board you as a client or provide products or services to you (in which case we will inform you accordingly).

#### **2. Your rights under the PDPL**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- request the erasure of your Personal Data; and/or
- withdraw your consent where UBS obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal), unless statutory or judicial requirements require otherwise.

UBS will honour such requests or withdrawal as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

In certain circumstances UBS may process your Personal Data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision making carried out and that a natural person reviews the related decision where such a decision is exclusively based on such processing.