



# PRIVACY NOTICE FOR CLIENTS – MEXICO

## DATA PROTECTION UNDER FEDERAL DATA PROTECTION HELD BY PRIVATE PARTIES ACT (THE “ACT”)

To run our business, UBS processes information about individuals (“**Personal Data**”), including information about our current, former and prospective clients (“**you**”).

UBS takes your privacy seriously. UBS ASESORES MÉXICO, S.A. DE C.V., UBS CASA DE BOLSA, S.A. DE C.V., (jointly and severally, hereinafter, the “**Responsible**” or “**UBS**”, “**we**”, “**our**”, or “**us**”) located at Avenida Pedregal No. 24 – Piso 11, Colonia Molino del Rey, Mexico City, Mexico, 11040 hereby provides you with this privacy notice (the “**Notice**”) which purpose is to notify the terms and conditions of the rights you have and the treatment of any information that relates to an identified or identifiable natural person, that could be considered as (i) Simple Personal Data, (ii) Financial Personal Data, and/or (iii) Sensitive Personal Data (hereinafter, jointly and severally as a general reference of the three types of Personal Data , in the understanding that UBS collects no Sensitive Personal Data from its current, former, or prospective clients) furnished by the holder thereof, assuming the responsibility for its use, handling, storage and confidentiality.

With regards to “**Client**” and/or “**Prospect**” the meaning of such terms means an individual that was, is, or may be Client and/or Prospect, or was, is or may be an individual that UBS provides or will provide him/her financial services.

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### 1 What does this Notice cover?

This Notice applies to any and all forms of use (“**processing**”) of Personal Data by us in Mexico if you are a former, current, or prospective client of any of the UBS entities 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 number, 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 contractual relationship, we collect (to the extent permitted by applicable law):

- personal details such as your name, identification numbers such as Citizen Number (CURP) and Federal Taxpayer Number (RFC), date of birth, KYC documents (including a copy of your national identity card or passport, source of wealth), phone number, physical and 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;
- voice recording and communication data;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, partner, or account number, including identifiers for accounting purposes;
- when you access UBS websites or our applications, 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). When you visit a UBS website, that website will contain additional information about how we use your information while you are visiting that website; and
- in some cases (where permitted by law), sensitive Personal Data, such as your political opinions or affiliations, and, to the extent legally possible, information relating to criminal convictions or offences. UBS will, as defined in the Act request your written and express consent to do so.

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, including email, and devices that you use to interact with us.

For our usage of cookies and other tracking technologies in relation to UBS websites please also refer to the UBS Website Usage and Cookie Notice available at: <https://www.ubs.com/global/en/legal/privacy.html>.

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.



The above-mentioned Personal Data mentioned are collected from:

- Information that you directly provide;
- Information that UBS receives from the entities that are part of the Corporate Group of the Client and/or Prospect.
- Information that UBS may receive from third parties such as past services providers.
- Information UBS may collect from public registers (which, depending on the product or service you receive and the country of the UBS entity with which you have a contractual relationship, may include beneficial ownership and other registers), public administration or other third-party 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), dependants or family members, representatives, and agents.

Where you are an institutional or corporate client or investor, we may also collect information about your directors, representatives, employees or shareholders or beneficial owner. Before providing UBS with this information, you should provide a copy of this Notice to those individuals.

### **3 For which purposes do we process Personal Data?**

- 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 individualized 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 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 as part of the onboarding process, 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;
  - to prevent and detect crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks.
- 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 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.

We use both automated (including artificial intelligence) and manual methods to process your Personal Data for these purposes. Our automated methods often are related to and supported by our manual methods. For example, our artificial intelligence systems may analyse your data to identify patterns and trends, which are usually manually reviewed and interpreted by humans.

#### **4 How do we protect 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 the UBS Group**

We usually share Personal Data with other companies of the group to which we belong (the “**UBS Group**”) for UBS’ Corporate Management, 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 share Personal Data with 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);
- (if you hold a credit card with us) 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 and hosting providers, marketing providers, communication services and printing providers, debt collection, tracing, debt recovery, fraud prevention, and credit reference agencies, 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, governmental bodies, or 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**

- 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 legitimate recipient required by applicable laws or regulations.

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

The Responsible gives notice that to comply with the purposes set out in Section 3, the Responsible can transfer Personal Data to third parties, in the understanding that these are obliged to maintain the confidentiality of the provided Personal Data and comply with the terms and conditions of the Notice. The Responsible may transfer the collected Personal Data to UBS' national or foreign entities or subsidiaries, which share internal policies and processes for the proper corporate management. Furthermore, if such third parties are located inside or outside Mexico, to the extent that we require your consent for any such transfer, we understand that by the terms of this Notice that we have obtained your implied consent absent any specific withdrawal of such consent by you, as indicated in Section 11 below.

## **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.

We will keep your personal data for as long as you are our customer to allow us to provide you with the services and to meet our regulatory requirements, as specified in this document.

Once our relationship with you has ended (for example, after your account has closed or following a transaction such as a payment, your application for a product is refused, or you decide not to go ahead with an application), we will only keep your personal data for a period that is appropriate, which in many cases is up to 10 years after your account closes or following a transaction such as a payment. The period we keep information for is often linked to the amount of time available to bring a legal claim, required by law or regulations, or for compliance and risk management.

We will keep your personal data after this time if we have to do so by law, if there are existing claims or complaints that will reasonably require us to keep your information, or for regulatory reasons. If we do need to keep your information for a longer period, we will continue to protect that information. However, if you wish to have your



Personal Data removed from our databases, you can make a request as described below, which we will review as set out therein.

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

### **7.1 Your rights (ARCO 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 inaccurate or incomplete, you may also request the rectification of your Personal Data.

You also have the right to:

- object to the processing of your Personal Data;
- cancel your Personal Data.

Cancellation of personal data will lead to a blocking period following which the data will be erased. The data controller may retain data exclusively for purposes pertaining to responsibilities arising from processing. The blocking period will be equal to the limitation period for actions arising from the legal relationship governing processing pursuant to applicable law.

When Personal Data is processed for direct marketing purposes, your right to object extends to direct marketing. You may object to direct marketing revoking your consent granted to us by emailing us at the addressed indicated in Section 7.2 at any time containing a request to be registered in the "Advertising Exclusion List", in order not to receive promotional information about our products and services.

UBS will honour such "ARCO rights" requests, 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.

### **7.2 Exercising your rights**

If you or your legal representative would like to exercise any of the above-mentioned ARCO rights, please send an e-mail to:

- [SH-DerechosARCO@ubs.com](mailto:SH-DerechosARCO@ubs.com), if you are a UBS client contact the Client Complaint Handling Unit (CHU);
- [SH-HR-DATA-REQUESTS-SNOW@ubs.com](mailto:SH-HR-DATA-REQUESTS-SNOW@ubs.com) if you are a former employee or candidate;

mentioning your name, address or any other mean to communicate the response to your request and the purpose of such request, specifying which ARCO Right established in the Act do you want to exercise. Upon receipt of such request, UBS will consider it in accordance with the Act, its Regulations and the internal privacy policies of UBS and shall respond to your request within a period of twenty (20) business days from receipt.

If you are not satisfied with how UBS processes your Personal Data, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your Personal Data, you can contact the Group Data Protection Office by emailing [dpo-americas@ubs.com](mailto:dpo-americas@ubs.com) or using the contact details that can be found at: [www.ubs.com/mexico](http://www.ubs.com/mexico).

## **8 Changes to your Personal Data**

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes or you would like to make any amendment to the information please inform us of the change as soon as possible.



## 9 Updates to this Notice

This Notice was updated in May 2024. We reserve the right to amend it from time to time. Any amendment or update to this Notice we will make available to you at <https://www.ubs.com/global/en/legal/privacy.html> . Please visit the UBS website frequently to understand the current Notice, as the terms of this Notice are closely related to you.

## 10 List of UBS entities covered by this Notice

Entity Name	Registered Address
UBS ASESORES MÉXICO, S.A. DE C.V.,	Avenida Pedregal No. 24 – Piso 11, Colonia Molino del Rey, Ciudad de México, México, 11040
UBS CASA DE BOLSA, S.A. DE C.V.	Avenida Pedregal No. 24 – Piso 11, Colonia Molino del Rey, Ciudad de México, México, 11040

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

## 11 Consent

By providing you with this Notice, you consent to the treatment of your Personal Data by UBS as described in this Notice unless you provide an express objection, by sending an email to [SH-DerechosARCO@ubs.com](mailto:SH-DerechosARCO@ubs.com)

Your consent applies to your Personal Data, whether the consent is provided as a result of this Notice; personally, or through any third party; or through any other electronic, optic, sound, audio visual means, or through any other technology or means available to UBS. It shall not be necessary to obtain an express consent for processing the Personal Data if it is aimed at performing the obligations arising from a legal relationship between you and UBS, or in respect of the events referred to in Article 10 of the Act.. All of this is without prejudice to your right to exercise the ARCO Rights upon the terms of the Act, and to exercise any right through the communication process established in this Notice.

By providing any third-party Personal Data to UBS, you further confirm that you have provided the Third Party with a copy of this Notice and have obtained their consent to any handling of their Personal Data by UBS.