



CLIENT PRIVACY NOTICE – URUGUAY

Clients with accounts in Financial Services USA subject to Data protection under the UY Data Protection- Law 183319 (LEY DE PROTECCION DE DATOS PERSONALES)

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;
- where your data is being transferred to; and
- what your rights and our obligations are in relation to such processing.

Table of Content	
1 What does this Notice cover?	7 What are your rights and how can you exercise them?
2 What types of Personal Data do we collect?	8 Changes to your Personal Data
3 For which purpose do we process your Personal Data and what legal basis do we rely on?	9 Updates to this Notice
4 How do we protect Personal Data?	10 List of UBS entities covered by this Notice
5 Who has access to Personal Data and with whom are they shared?	11 List of parties processing your data
6 How long do we store your data?	

1 What does this Notice cover?

This Notice applies to any and all forms of use of Personal Data (“**processing**”) by us, to comply with Central Bank of UY requirements (Securities Market Compilation of Rules) that requires UBS Uruguay to keep local records of data processed in Uruguay if you are a former or current client of the UBS entity listed in Section 10.

2 What types of Personal Data do we collect?

Birth and family details, Client Financial Information, Internal identifiers, Physical and electronic address data, Professional profile, Public registry information, Personal details & identification, Transactions and Processing

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 Information for a specific purpose and only process the Personal Information which is relevant to achieve that purpose. In particular, we process Personal Information for the following purpose:

Compliance with Legal and Regulatory obligations:

To meet our on-going regulatory and compliance obligations (e.g., laws of the financial sector), disclosures to authorities, financial service regulators and other regulatory, judicial and governmental bodies.



Basis for processing of personal data:

Based on the Data Protection Law of Uruguay, we rely on Article 9B (requested for the exercise of functions proper to the powers of attorney of the State or by virtue of a legal obligation) for the processing of your Personal Data.

4 How do we protect your Personal Data?

All UBS staff accessing Personal Data must comply with the internal rules and processes in relation to the processing of Personal Data to protect them and to 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 and the UBS Group

We share your Personal Data with UBS FSI, for the purposes indicated in Section 3.1, to ensure a consistently high service standard across our group.

5.2 Outside UBS and the UBS Group

5.2.1 Service Providers

We share Personal Data with our suppliers, who are contractually bound to confidentiality, such as storage providers. 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).

5.2.2 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.

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 processed in other country. 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 Uruguayan authorities or another statutory exemption) provided by local applicable law.

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.

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 purposes in accordance with applicable laws as well as pursuant to various retention and documentation obligations or if it is in UBS' legitimate interest.

However, 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

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 where of the data is, or proves to be, illegitimate, inappropriate, or excessive;
- request the withdrawal or blocking of their data from the data banks that are used for advertising purposes.

7.2 Exercising your rights

To exercise the above rights, please send an e-mail to sh-diso-wma@ubs.com;

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-americas@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 June 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 [here](#). 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

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 one of the following UBS entities in Uruguay:

Entity Name	Registered Address
UBS Financial Services Uruguay Sociedad de Responsabilidad Limitada	Ruta 8, Km. 17500 Edificio @1, L. 307 ; Postcode. 91600 ; City/Parish. Montevideo, Uruguay

If you have any questions or comments about this notice, please contact the UBS Group Data Protection Office at dpo-americas@ubs.com.

11 List of parties processing your data

Entity Name	Registered Address
UBS Financial Services Inc.	1200 Harbour Boulevard Weehawken, NJ 07086, USA
Microsoft Azure	Takeda Ireland Ltd (Grange Castle), New Nangor Road, Grange, Dublin 22, Co. Dublin, Ireland