

# UBS EXTERNAL STAFF PRIVACY NOTICE – SAUDI ARABIA

## DATA PROTECTION UNDER THE PERSONAL DATA PROTECTION LAW (PDPL)

To run our business, UBS processes information about individuals (“**Personal Data**”), including information about the employees and contractors of our suppliers (“**you**” or “**External Staff**”).

UBS takes your privacy seriously. This Privacy Notice (“**Notice**”) contains information on what Personal Data the UBS entities in Saudi Arabia referred to in Section 10 (“**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 we want to inform you in a transparent manner:

- why and how UBS collects, uses and stores your 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.

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### 1 What does this Notice cover?

This Notice applies to any and all forms of use of Personal Data (“**processing**”) by UBS in relation to our External Staff in Saudi Arabia.

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

We collect basic identification information, such as your name, title, position, professional history, experience, language skills and contact details. Such information will be collected if provided to us by your employer, for instance on a CV you have prepared, even if you do not ultimately work on an assignment for UBS.

In addition, for External Staff working on UBS premises, we usually collect (to the extent permitted by applicable law):

- Detailed identification information (e.g., address, office location, business telephone number, date and place of birth, picture, emergency contact details, ID card, passport details and other national ID numbers as required);

- Detailed professional information (e.g., academic, professional and industry qualifications and certifications (including dates), directorship information, contact details of references, previous employment dates, rank or seniority, line manager contact information, working arrangements (such as full or part time), assignment allocation and absence information);
- Electronic identification data (e.g., login information, access right, badge number, IP address, online identifiers/cookies, logs and connection time, sound or image recording such as CCTV or voice recordings);
- Personal and physical characteristics (e.g., gender, date of birth and immigration status, and physical characteristics); and
- Information submitted in support of an application to work for UBS on behalf of your employer (e.g., anything you choose to submit in support of your or your employer's application). Where relevant and to the extent permitted by applicable law, the Personal Data that we collect will also include data about racial and ethnic origin and political opinions, or health data (for instance to allow UBS to make appropriate adjustments to your working environment as a result of a disability) and data about alleged or proven criminal offences in each case where permitted by law.

In some cases, the personal data we collect from you is needed to meet our legal or regulatory obligations, to perform our obligations under UBS's contract with your employer (UBS's supplier), or to enter into that contract. If so, we will indicate to you that the provision of this information is mandatory, and the consequences if we cannot collect this information.

The above-mentioned Personal Data are collected from information that you or your employer directly provide and, in some cases, UBS will also collect Personal Data indirectly from background check providers such as HireRight or Sterling, and other administration services providers, or from publicly available sources such as LinkedIn profiles.

### **3 For which purpose 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. We thereby take into account the role in which you are active with UBS.

In particular, we process Personal Data of our External Staff to:

- a) Selection:
  - determine the suitability of External Staff qualifications;
  - prepare for and enter into a contract with our supplier.
- b) Onboarding:
  - set up internal profiles, collect information required to complete the onboarding process. For background checks please see section e) below;
  - assist us in managing external providers such as your employer (see section 5 for further information about when we work with service providers).
- c) Staff Administration:
  - administer, plan and manage our personnel, suppliers and contractors (including task management and internal workforce analysis and planning);
  - allocate costs, optimize performance and enhance quality;
  - where relevant, manage and make available Personal Data within the UBS Group;
  - carry out supplier performance reviews, satisfaction surveys and other contractor surveys;

- track staff' interaction with internal email communication (including newsletters, interest groups and messages) to enable delivery of more relevant personalized content for improved readership and engagement.
- d) Training, development and other staff offerings,:
- train our External Staff;
  - carry out development initiatives and coaching activities;
  - inform you of internal events, leisure activities, and corporate sponsored discounts through approved third-party providers.
- e) Compliance & Risk Management and / or Crime Prevention, Detection & Investigation,:
- check for any existing or potential conflicts of interest or any other restrictions which may otherwise restrict or prevent a prospective engagement on a matter with UBS;
  - carry out periodic vetting checks where relevant;
  - receive and handle complaints, requests or reports from employees or third parties made to a compliance function, HR function, or other designated units within UBS or the UBS Group;
  - track relevant incidents related to our External Staff and / or persons they might have a connection with, in order to comply with legal or regulatory obligations, internal policies or for risk management purposes;
  - monitor and investigate electronic communications in order to be able to comply with legal or regulatory obligations, including compliance with banking regulations and internal policies or for risk management purposes;
  - track and record data accesses, to evaluate them and to scan data carriers as well as to evaluate the accessing or storage of data with the objective of ascertaining whether there has been a breach of the obligation to be task-related;
  - conduct internal investigations in line with UBS policies and/or as required by applicable legislation;
  - 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 provide for a centralized, global approach to the provision of IT services to our External Staff and enable External Staff within the UBS group to interact with one another and UBS employees. This normally involves the hosting of your contact and e-mail information to allow UBS's global IT network to be established and populated with relevant details;
  - to manage our IT resources, including infrastructure management and business continuity.
- g) Other purposes:
- to exercise our duties and/or rights vis-à-vis you or third parties;
  - 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 offer our products and services to our customers (e.g., we may communicate professional contact details of one of our employees to a customer or supplier, indicating that this person is the contact person within the UBS organization);
  - to collect data to ensure the security of buildings as well as property and information located or stored on the premises, to prevent, and, if necessary, investigate unauthorized physical access to secure premises (e.g., maintaining building access logs and CCTV system images).

### **3.2 Basis for the processing of Personal Data**

For most of the purposes of the processing activity (see section 3.1), the legal basis for the processing of your Personal Data will always be your implicit or explicit consent or where necessary to safeguard the legitimate interests of UBS or of third parties (including but not limited to the data protection and privacy interest of our employees or other involved individuals), without unduly affecting your interests or fundamental rights and freedoms.

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.

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

- the processing is necessary to meet our legal or regulatory responsibilities;
- you have given your explicit consent to us to process that information (where legally permissible).

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

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

All personnel accessing Personal Data must comply with the 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 organizational measures to protect your Personal Data against unauthorized, 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 make available Personal Data to members of our personnel and within the UBS Group for the purposes indicated in section 3.1. 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 (including brokers, exchanges, upstream withholding agents; swap or trade repositories, stock exchanges, central securities depositories), our professional advisers and consultants (e.g., lawyers, tax accountants or labour consultants) or clients as part of you working on tasks related to or involving those parties.

#### **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 system or hosting providers, payroll providers, cloud service providers, database providers, training, education and development providers and third parties who carry out vetting checks, and other goods and services providers (such as communication service providers). When we do so 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 Other**

- 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 Transfer 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 or another statutory exemption provided by local applicable law).

You may request additional information in this respect and obtain a copy of the relevant safeguard by contacting the Group Data Protection Office at [dpo-mena@ubs.com](mailto:dpo-mena@ubs.com).

A list of the countries in which UBS and the UBS Group operate can be found at <https://www.ubs.com/global/en/our-firm/locations.html>.

### **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 requirement. In general, your Personal Data will be kept in our systems during your engagement with UBS and up to 10 years, from the day that your engagement with UBS terminates. There may be exceptions to this general rule, for example:

- a) Personal Data that is no longer required or has become obsolete may be destroyed while the External Staff relationship is still ongoing for proportionality reasons;
- b) In certain cases, UBS may store and process Personal Data for a longer period than 10 years, in particular for compliance or risk management purposes, to comply with (other) legal and regulatory requirements.

If you were previously or are currently a Credit Suisse External Staff: Your information after your transition to UBS will be stored as per above. However, your information prior to your transition to UBS and/or any activities performed under the Credit Suisse entities, will continue to be stored as per the applicable Credit Suisse retention requirements until the full integration of systems and processes into UBS are completed.

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:

- object to the processing of your Personal Data.
- request the erasure or destruction 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) statutory or judicial requirements require otherwise.

UBS will honor 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.

## 7.2 Exercising your rights

To exercise the above rights, please send an email to [sh-hr-data-requests-snow@ubs.com](mailto:sh-hr-data-requests-snow@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 Group Data Protection Office at [dpo-mena@ubs.com](mailto:dpo-mena@ubs.com).

## 8 Changes to your Personal Data

In the interest of keeping Personal Data properly up to date and accurate, we will ask you periodically to review and confirm the Personal Data we hold about you and/or to inform us of any change in relation to your Personal Data (such as a change of address).

## 9 Updates to this Notice

This Notice was updated in September 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 contracting entities covered by this Notice

Entity Name	Registered Address
UBS Saudi Arabia	Laysen Valley, Building No. 6, King Khaled Road, Riyadh 12329 - 2376,
UBS AG, Riyadh Branch	Laysen Valley, Building No. 6, King Khaled Road, Riyadh 12329 - 2376,
Credit Suisse Saudi Arabia	Laysen Valley, Building No. 6, King Khaled Road, Riyadh 12329 - 2376,

If you have any questions or comments about this Notice, please contact the Group Data Protection Office at the following email address: [dpo-mena@ubs.com](mailto:dpo-mena@ubs.com). For additional information please visit [goto/groupdpo](https://www.ubs.com/groupdpo).

## 11 Entities to which the Personal Data will be disclosed

Please refer to the table below for the list of the entities to which the Personal Data will be disclosed and whether the personal data will be transferred, disclosed, or processed outside Saudi Arabia:

Recipient	Purpose of data processing	Processed outside Saudi Arabia
Credit Suisse (Poland) Sp. z o.o.	Data processor	Yes
Credit Suisse Services AG	Data processor	Yes
OOO UBS Bank	Data processor	Yes
PT UBS Sekuritas Indonesia	Data processor	Yes
UBS (China) Limited	Data processor	Yes
UBS (France) S.A.	Data processor	Yes
UBS (Monaco) S.A.	Data processor	Yes
UBS AG	Data processor	Yes

UBS AG Australia Branch	Data processor	Yes
UBS AG Dubai Branch	Data processor	Yes
UBS AG Hong Kong Branch	Data processor	Yes
UBS AG Jersey Branch	Data processor	Yes
UBS AG London Branch	Data processor	Yes
UBS AG New York (1285 Avenue of the Americas) Branch	Data processor	Yes
UBS AG Singapore Branch	Data processor	Yes
UBS AG Stamford Branch	Data processor	Yes
UBS AG Taipei Branch	Data processor	Yes
UBS AG Tokyo Branch	Data processor	Yes
UBS Americas Inc.	Data processor	Yes
UBS Asesores SA	Data processor	Yes
UBS Asset Management (Canada) Inc.	Data processor	Yes
UBS Asset Management (Deutschland) GmbH	Data processor	Yes
UBS Asset Management (Italia) SGR SpA	Data processor	Yes
UBS Asset Management (Japan) Ltd	Data processor	Yes
UBS Asset Management (Singapore) Ltd	Data processor	Yes
UBS Asset Management (Taiwan) Ltd	Data processor	Yes
UBS Asset Management AG	Data processor	Yes
UBS Asset Management Holding Ltd	Data processor	Yes
UBS Asset Management Switzerland AG	Data processor	Yes
UBS Bank USA	Data processor	Yes
UBS Business Solution Center Mumbai	Data processor	Yes
UBS Business Solutions (China) Co., Ltd.	Data processor	Yes
UBS Business Solutions (India) Private Limited	Data processor	Yes
UBS Business Solutions AG	Data processor	Yes
UBS Business Solutions AG, UK Branch	Data processor	Yes
UBS Business Solutions Center Hyderabad SEZ	Data processor	Yes
UBS Business Solutions Center Pune SEZ	Data processor	Yes
UBS Business Solutions Poland Sp. z o.o.	Data processor	Yes
UBS Business Solutions US LLC	Data processor	Yes
UBS Europe SE	Data processor	Yes
UBS Europe SE, Luxembourg Branch	Data processor	Yes
UBS Europe SE, Netherlands Branch	Data processor	Yes
UBS Europe SE, Poland Branch	Data processor	Yes
UBS Europe SE, Succursale de France	Data processor	Yes
UBS Europe SE, Succursale Italia	Data processor	Yes
UBS Europe SE, sucursal en España	Data processor	Yes

UBS Europe SE, Sweden Bankfilial	Data processor	Yes
UBS Financial Services (Uruguay) Sociedad de Responsabilidad Limitada	Data processor	Yes
UBS Fund Management (Luxembourg) S.A.	Data processor	Yes
UBS Fund Management (Switzerland) AG	Data processor	Yes
UBS Hyderabad Office	Data processor	Yes
UBS New Zealand Limited	Data processor	Yes
UBS Securities Canada Inc.	Data processor	Yes
UBS Securities Co. Limited	Data processor	Yes
UBS Securities India Private Limited	Data processor	Yes
UBS Securities Israel Limited	Data processor	Yes
UBS Securities Japan Co., Ltd.	Data processor	Yes
UBS Securities LLC	Data processor	Yes
UBS Securities Malaysia Sdn. Bhd.	Data processor	Yes
UBS Securities Philippines Inc	Data processor	Yes
UBS Securities Pte. Ltd. Seoul Branch	Data processor	Yes
UBS Securities Pte. Ltd. Taipei Branch	Data processor	Yes
UBS Servicios, S.A. de C.V.	Data processor	Yes
UBS South Africa (Proprietary) Limited	Data processor	Yes
UBS Switzerland AG	Data processor	Yes
UBS Wealth Management Israel Ltd	Data processor	Yes
Management Consultants & IT Hardware, Software and Outsourcing providers (incl. telecommunication service and cloud providers)	Data processor Example provider: Accenture	Yes
Personnel Service Providers	Data processor Example provider: ADP	Yes
Transportation and Travel Management Providers	Data processor Example provider: AEA International Holdings	Yes
Business Process Outsourcing (BPO) providers	Data processor Example provider: Chain IQ	Yes
Marketing and Communication Providers	Data processor Example provider: Concise	Yes
Law Firms & Personnel Service Providers & IT Hardware, Software and Outsourcing providers (incl. telecommunication service and cloud providers)	Data processor Example provider: KPMG	Yes