

# Privacy statement

UBS Swiss Financial Advisers AG ("UBS-SFA") appreciates your visit to this web site ("UBS-SFA Website") and your interest in our services and products. Your privacy is important to us and we want you to feel comfortable visiting our site. We take care to protect your personal data collected, processed and used during visits to the UBS-SFA Website.

Please review both the Privacy Notices applicable to US and Swiss regulated entities:

- Client Privacy Notice
- Data Privacy Notice

By accessing the UBS-SFA Website you accept this Privacy Statement ("Statement").

If you do not agree to this Statement, do not proceed to further web pages of the UBS-SFA Website.

This Statement may be updated from time to time. We therefore ask you to consult it on a regular basis. The last line of this Statement below indicates when the Statement was last updated.

## **1      What are the purpose and the scope of this Statement?**

UBS-SFA is committed to safeguarding the personal information that we collect from individuals who use the UBS-SFA Website. Accordingly, UBS-SFA has developed this Statement to describe how and what type of data will be collected from users of the UBS-SFA Website and the purposes for which UBS-SFA may collect, share or disclose the data. UBS-SFA also outlines reasonable precautions which are taken to keep your data secure.

This Statement applies to any information obtained by UBS-SFA through your use of the UBS-SFA Website. It is not applicable to any Internet websites controlled by third parties not affiliated with UBS-SFA that the UBS-SFA Website may link to ("Third Party Sites"). Please review the privacy statements of Third-Party Sites as UBS-SFA is not responsible for and has no influence on the content or the privacy practices of Third-Party Sites.

The terms of this Statement are subject to any additional terms of disclaimers or other contractual terms you have entered into with UBS-SFA such as client privacy statements or notices, and any applicable mandatory laws and regulations.

## **2      What information do we collect from you and for what purpose?**

When you visit the UBS-SFA Website, our web server automatically records details about your visit (for example, your IP address, the web site from which you visit us, the type of browser software used, the UBS-SFA Website pages that you actually visit including the date and the duration of your visit).

In addition, we collect personal data which you provide through the UBS-SFA Website, for example when you enter personal details (e.g., name, gender, address, e-mail address, phone/fax number) on a registration page or if you sign up for an email newsletter.

## **3      UBS-SFA will use your personal data:**

- for the purposes of technical administration and research & development of the UBS-SFA Website;
- for customer and user administration and marketing;
- to inform you about our services and products; and
- for such purposes as otherwise specified.

UBS-SFA respects applicable laws and regulations in its use of personal data.

**4 How do we collect and store information from you?**

UBS-SFA uses tracking technology such as cookies or tags to gather information as outlined above (see: "What information do we collect from you and for what purpose?") to understand how visitors use the UBS-SFA Website.

Tracking technology helps us manage and improve the usability of the UBS-SFA Website, for example by detecting whether there has been any contact between your computer and us in the past and to identify the most popular sections of the UBS-SFA Website.

When you save your cookie settings, they should also apply to your future visits to the UBS-SFA Website. However, for technical reasons beyond UBS-SFA's control, this cannot be guaranteed. For example, if you reset your browser, delete your cookies or access the UBS-SFA website from another browser or device your cookie settings may be lost. To comply with applicable laws and regulations, in some countries you may be asked to confirm your cookie settings when you first visit the UBS-SFA Website. If you are in a country where you are automatically required to set your cookie settings, you may be asked to set them again on a future visit.

In many cases you can also control tracking technologies using your browser. Please ensure that your browser setting reflects whether you wish to be warned about and/or accept tracking technologies (such as cookies) where possible. The specific capabilities of your browser and instructions on how to use them can usually be found in the manual or help file of your browser.

Refusing, disabling or deactivating of tracking technologies may result in a reduced availability of the services provided by the UBS-SFA Website or parts of the UBS-SFA Website may no longer function correctly.

**5 To whom do we disclose your information collected from the UBS-SFA Website?**

UBS-SFA may disclose your information to its affiliates and its and their agents and third-party providers inside or outside your country of residence to perform services for UBS-SFA and for the purposes stated above. Our affiliates, agents and third-party providers who have access to personal data obtained through the UBS-SFA Website are obliged to respect privacy.

When transferring personal data internationally we make sure that we comply with applicable laws and regulations, for example, by entering into agreements which will ensure that the recipients of your information maintain an adequate level of data protection.

We may also disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request, or under any and for the purposes of any guidelines issued by regulatory or other authorities, or similar processes as either required or permitted by applicable law.

**6 What security measures have we implemented to protect your information collected through the UBS-SFA Website?**

UBS-SFA has implemented reasonable technical and organizational security measures to protect your personal data collected by UBS-SFA via the UBS-SFA Website against unauthorized access, misuse, loss or destruction.

**7 How do we treat electronic messages sent to and from UBS-SFA?**

All electronic messages sent to and from UBS-SFA are automatically retained in a distinct journaling system which preserves the evidential weight of the e-mails. They are protected by reasonable technical and organizational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g., court order, suspicion of criminal conduct, violation of regulatory obligations, material breach of employment contract) to specific persons in defined functions (e.g., Legal, Compliance, Risk).

**8 What should you consider when sending data over the Internet?**

The Internet is generally not regarded as a secure environment, and information sent via the Internet (such as to or from the UBS-SFA Website or via electronic message) may be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the Internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

Please note that we accept no responsibility or liability for the security of your information whilst in transit over the Internet to UBS-SFA. In order to protect your privacy, we would like to remind you that you may choose another means of communication with UBS-SFA, where you deem it appropriate.

**9 How do we deal with information from individuals under the age of 18?**

The UBS-SFA Website does not seek to collect personal data from individuals under the age of 18. Individuals under the age of 18 should receive permission from their parent or legal guardian before providing any personal data to UBS-SFA on the UBS-SFA Website.

**10 How can you access or review your personal data?**

You may, where permitted by applicable law or regulation:

- check whether we hold your personal data;
- ask us to provide you with a copy of your personal data; or
- require us to correct any of your personal data that is inaccurate.

Should you have a request regarding the processing of your personal data please send a letter to the following address:

Dr. Gabriele Holstein  
Group Data Protection Officer  
UBS Business Solutions AG  
P.O. Box 8098 Zürich Switzerland

Last update in May 2022.

**Contact us**

UBS Swiss Financial Advisers AG  
Loewenstrasse 49  
8001 Zurich  
Switzerland

Tel. +41-44-217 31 00 (Switzerland)  
Tel. +1-855-853 4288 (USA, toll free)

# US Client Privacy Notice

**UBS Swiss Financial Advisers AG ("UBS-SFA") takes important steps to help safeguard the personal information (personal data) we collect about our clients. This Client Privacy Notice describes the personal information we collect and how we handle and protect that information in line with applicable United States law and regulatory requirements. This Client Privacy Notice applies to current and former clients.**

FACTS	What does UBS-SFA do with your personal information?
<b>Why?</b>	Financial companies choose how they share your personal information. US Federal law gives consumers the right to limit some but not all sharing and also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Contact &amp; identifying information (e.g., Social Security number, date of birth, and address)</li> <li>• Income and risk profile, terms of contract, and type of business concluded</li> <li>• Transaction history, including beneficiaries and details of traded securities</li> <li>• Account balances and assets</li> </ul>
<b>How?</b>	<p>When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>All financial companies need to share their customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share customers' personal information; the reasons UBS-SFA chooses to share; and whether you can limit this sharing.</p>

Reasons we can share	Does UBS-SFA share?	Can you limit this sharing?
<b>For our everyday business purposes:</b> such as to process your transactions, maintain your account(s), applicable regulatory reporting, respond to court orders and legal investigations, or other additional services you have signed up for (e.g., tax reclaim services).	Yes	No
<b>For our marketing purposes:</b> to offer our products and services to you	No	n/a
For joint marketing with other financial companies	No	n/a
<b>For our affiliates' everyday business purposes:</b> information about your transactions, experiences, and creditworthiness	No	n/a
<b>For non-affiliates to market to you</b>	No	n/a

**Questions?**

**Call +1-855-853-4288  
or go to [www.ubs.com/ubs-sfa](http://www.ubs.com/ubs-sfa)**

<b>Who we are?</b>	
<b>Who is providing this notice?</b>	UBS-SFA
<b>What we do?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with both Swiss and US federal laws.
<b>How do we protect your personal information?</b>	These measures include electronic and procedural safeguards such as secured files and buildings.
<b>How do we collect your personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>• complete an account application and other forms for verification of data; and</li> <li>• conduct transactions and interactions with us.</li> </ul>
<b>How can you limit sharing?</b>	US federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing. <p>Note: As UBS-SFA does not share any of the above-referenced information, there is no need to limit sharing.</p>
<b>Definitions</b>	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. UBS-SFA's affiliates generally include companies with a UBS name.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement

# PRIVACY NOTICE FOR CLIENTS – SWITZERLAND

## DATA PROTECTION UNDER THE SWISS DATA PROTECTION LAW

To run our business, UBS processes information about natural and legal persons ("Personal Data"), including information about our prospective, current and former clients ("you").

UBS takes your privacy seriously. This Privacy Notice ("Notice") contains information on what Personal Data the UBS entities listed 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 ("processing") of Personal Data by us 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, 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, 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 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 Usage and Cookie Notice available [here](#).

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. For example:
  - 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. For example, 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;
  - help us to learn more about you as a client, the products and services you receive, your activity on UBS websites, our applications for mobile devices, on UBS platforms, 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, how you like to be contacted;
  - 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. For example, 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;
  - 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;
  - perform underwriting.
- d) Engaging in prospecting and business development and / or protecting and enhancing the UBS brand. For example, 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;
  - 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;
  - 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. For example, 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;
  - 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, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime;
  - receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
  - 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. For example, 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.
- g) Other purposes. For example:
  - 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 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);
  - 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 Basis for processing of Personal Data**

UBS processes your Personal Data within the applicable legal framework. Where required and depending on the purpose of the processing activity (see Section 3.1), the processing of your Personal Data will be one of the following grounds:

- 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, as well as certain of the data disclosures described in Section 5 below;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks, such as when we use your data for some of the purposes in Section 3.1 e) and g) above, and make the disclosures to authorities, regulators and government bodies referred to in Section 5 below;

- necessary for the legitimate interests of UBS SFA, 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);
- in some cases, we have obtained your consent (for instance where required by law) or processed, where required under applicable laws or regulations, with your explicit consent in the case of special categories of Personal Data (such as your biometric data); or
- in some cases, necessary for the performance of a task carried out in the public interest.

A legitimate interest of UBS is in particular considered in the following instances. The processing is necessary to:

- 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);
- 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);
- exercise our rights under Articles 26 and 27 of the Federal Constitution of the Swiss Confederation, including our freedom to conduct a business and right to property;
- meet our accountability for prudent operational management (see section 3.1 g) above) and regulatory requirements around the world; and
- certain situations 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 customers, employees and other stakeholders satisfied.

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 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).

**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 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.

**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.

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

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 e-mails to you, or by emailing us at the address indicated in Section 7.2 at any time.

Where we process your Personal Data on the basis of 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.

### 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;
- for UBS Swiss Financial Advisers AG; send an e-mail to [sfa@ubs.com](mailto:sfa@ubs.com);
- for UBS AG or UBS Europe SE Swiss Branch send an e-mail to [sh-ibdiso@ubs.com](mailto:sh-ibdiso@ubs.com);
- for UBS Asset Management Switzerland AG and UBS Fund Management (Switzerland) AG send an e-mail to [dl-am-cc-inst-ch-cserv@ubs.com](mailto:dl-am-cc-inst-ch-cserv@ubs.com);
- send an e-mail to [SH-HR-DATA-REQUESTS-SNOW@ubs.com](mailto:SH-HR-DATA-REQUESTS-SNOW@ubs.com) if you are a former UBS employee.

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-ch@ubs.com](mailto:dpo-ch@ubs.com).

**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, please inform us of the change as soon as possible.

**9 Updates to this Notice**

This Notice was updated in May 2022. 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**

Entity Name	Registered Address
UBS Switzerland AG	Bahnhofstrasse 45, Zürich, 8001, Switzerland
UBS Swiss Financial Advisers AG	Löwenstrasse 49, Zürich, 8001, Switzerland
UBS AG	Bahnhofstrasse 45, Zürich, 8001, Switzerland; Aeschenplatz 6, Basel, 4052, Switzerland
UBS Europe SE, Frankfurt am Main, Swiss Branch, Opfikon	Europastrasse 1, Opfikon, 8152, Switzerland
UBS Asset Management Switzerland AG	Bahnhofstrasse 45, Zürich, 8001, Switzerland
UBS Fund Management (Switzerland) AG	Aeschenplatz 6, Basel, 4052, Switzerland
UBS Partner Switzerland AG	c/o UBS AG, Bahnhofstrasse 45, Zürich, 8001, Switzerland

**11 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

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).