

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.

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.

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.

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.

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.

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.

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.

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).

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.

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.

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 July 2019.

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?
Why?	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.
What?	<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"> • Contact & identifying information (e.g. Social Security number, date of birth, and address) • Income and risk profile, terms of contract, and type of business concluded • Transaction history, including beneficiaries and details of traded securities Account balances and assets <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	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.

Reasons we can share	Does UBS-SFA share?	Can you limit this sharing?
For our everyday business purposes: 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
For our marketing purposes: to offer our products and services to you	No	n/a
For joint marketing with other financial companies	No	n/a
For our affiliates’ everyday business purposes: information about your transactions, experiences, and creditworthiness	No	n/a
For non-affiliates to market to you	No	n/a

Questions?

Call +1-855-853-4288
or go to www.ubs.com/ubs-sfa

Who we are?	
Who is providing this notice?	UBS-SFA
What we do?	To protect your personal information from unauthorized access and use, we use security measures that comply with both Swiss and US federal laws.
How do we protect your personal information?	These measures include electronic and procedural safeguards such as secured files and buildings.
How do we collect your personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> •complete an account application and other forms for verification of data; and •conduct transactions and interactions with us.
How can you limit sharing?	US federal law gives you the right to limit only <ul style="list-style-type: none"> •sharing for affiliates' everyday business purposes – information about your creditworthiness •affiliates from using your information to market to you •sharing for non-affiliates to market to you 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>
Definitions	
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

Swiss Data Privacy Notice

1. Data protection

UBS-SFA takes your privacy seriously. UBS-SFA adheres to high data protection standards as well as transparency of personal data collection and processing for our clients. This privacy notice contains general information on what personal data the UBS entities in Switzerland referred to in section 11 below collect, what they do with that information, and what rights you have. If you have any questions or comments, please contact us at the address set out in section 8. "Personal data" is any information that relates to an identified or identifiable natural person (rather than to a legal entity, such as a company).

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

- why and how UBS-SFA collects, uses and stores your personal data;
- the lawful basis on which your personal data is processed; and
- what your rights and our obligations are in relation to such processing.

2. What types of personal data do we collect?

The UBS entities in Switzerland referred to in section 11 below ("**UBS**", "**we**", "**our**", or "**us**") will, depending on the product or service we provide to you (if any), collect and process personal data about you including:

- personal details such as your name, identification number, date of birth, KYC documents (including a copy of your national identity card or passport), 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 applicable, 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;
- any records of phone calls between you and UBS-SFA;
- where applicable, details of your nomination of a mandate;
- identifiers we assign to you, such as your client or account number;
- when you access our Website, data transmitted by your browser 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 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). Our 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), 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.

In some cases, we collect this information from public registers (which, depending on the product or service you receive, 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 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, and agents. Additionally, where you are an institutional or corporate client or investor, we will also collect information about your directors, employees or shareholders. Before providing us with this information, you should provide a copy of this notice to those individuals.

3. On which legal basis and for which purposes do we process personal data?

3.1 Legal basis for processing

Depending on the purpose of the processing activity (see section 3.2), the processing of your personal data will be one of the following:

- (i) necessary for the legitimate interests of UBS-SFA, without unduly affecting your interests or fundamental rights and freedoms (see below);
- (ii) 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 sections 3.2(a), (b) (c) and (j) below (as well as certain of the data disclosures described in section 4);
- (iii) required to meet our legal or regulatory responsibilities, including when we conduct the checks referred to in section 3.2(a) below and make the disclosures to authorities, regulators and government bodies referred to in sections 3.2(g) and 4 below;
- (iv) in some cases, necessary for the performance of a task carried out in the public interest;
- (v) when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (vi) in limited circumstances, processed with your consent which we obtain from you from time to time (for instance where required by laws), or processed with your explicit consent in the case of special categories of personal data.

Examples of the "legitimate interests" referred to above are:

- pursuing certain of the purposes in sections 3.2(a) to 3.2(k) below;
- exercising 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;
- when we make the disclosures referred to in section 4 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; and
- meeting our accountability and regulatory requirements around the world,

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

Any consent UBS-SFA has obtained to process ordinary personal data does not apply for the purposes of the EU General Data Protection Regulation 2016/679 ("EU GDPR"). Instead, for the purposes of the EU GDPR, UBS-SFA relies on the lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this notice) and UBS-SFA's ability to rely on any such consent for the purposes of the EU GDPR is hereby waived or extinguished. For the avoidance of doubt, any consent given for any other reason, for instance (and if applicable) compliance with the Federal Act on Data Protection or the banking secrecy provision of the Swiss Federal Act on Banks and Savings Banks 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).

3.2 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 for the following purposes:

- a) client on-boarding processes, including to verify your identity and assess your application (including the need for guarantees or other securitization tools) if you apply for credit, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);
- b) providing 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;
- c) managing 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;
- d) helping us to learn more about you as a customer, the products and services you receive, and other products and services you may be interested in receiving, including profiling based on the processing of your personal data, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;
- e) taking 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;
- f) contacting 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;
- g) meeting 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 and governmental bodies, and investigating or preventing crime;
- h) ensuring the safety of our customers, employees and other stakeholders;
- i) undertaking transactional and statistical analysis, and related research;
- j) underwriting;
- k) for the UBS Group's prudent operational management (including credit and risk management, insurance, audit, systems and products training and similar administrative purposes); and
- l) any other purposes we notify to you from time to time.

4. Who has access to personal data and with whom are they shared?

4.1 With the UBS Group

We usually share personal data with other UBS Group companies in order to ensure a consistently high service standard across our group, and to provide services and products to you. More information about the UBS Group companies who receive your personal data can be found in section 11.

4.2 Third Parties

When providing products and services to you, we will share personal data with persons acting on your behalf or otherwise involved in the transaction (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);
- companies in which you have an interest in securities where such securities are held by the bank for you;
- payment recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;
- clearing houses, and clearing or settlement systems; and specialized payment companies or institutions such as SWIFT;
- (if you hold a credit card with us) credit card associations, and other card payment and platform providers;
- 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; and
- any introducing broker to whom we provide introductions or referrals.

4.3 Service providers

In some instances, we also share personal data with our suppliers, including UBS Group companies and other business partners who provide services to us, 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.

4.4 Public or regulatory authorities

If required from time to time, we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

4.5 Others

- If our business is sold to another organization or if it is re-organized, personal data will be shared so that you can continue to receive products and services. We will usually also share personal data with prospective purchasers when we consider selling or transferring part or all of a business. We take steps to ensure such potential purchasers keep the data secure.
- 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.

5. International transfers of personal data

The Recipients referred to in section 4 above may be located outside Switzerland. In those cases, except where the relevant country has been determined by the Federal Data Protection and Information Commissioner to provide an adequate level of protection, UBS-SFA requires such recipients to comply with appropriate measures designed to protect personal data contained within a binding legal agreement. A copy of these measures can be obtained by contacting the Data Protection Officer ("DPO") at the address at the end of this notice. If and to the extent required by applicable law (such as Swiss Banking Secrecy), 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, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. Examples of retention periods that are specific to your country are set out in section 11 below.

7. Your rights

You have a right to ask UBS-SFA to rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data: these rights are not absolute (as sometimes there may be overriding interests that require the processing to continue, for example), but we will consider your request and respond to you with the outcome. When personal data are 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 following the unsubscribe instructions in any of our marketing emails to you, or by contacting us at the address set out in section 8.

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 under applicable data protection laws to request your personal data be transferred to you or to another controller. You have the right to ask UBS-SFA for a copy of some or all of the personal data we collect and process about you.

In certain circumstances UBS-SFA may process your personal data through automated decision-making, including profiling. Where this takes place, you will be informed of such automated decision-making that uses your personal data, be given information on the logic involved, and be informed of the possible consequences of such processing. In certain circumstances, you can request not to be subject to automated decision-making, including profiling.

You can exercise the rights set out above by contacting the DPO using the details in section 8 of this notice.

8. Exercising your rights and complaints

If you are not satisfied with any aspect of the processing of your personal data by UBS-SFA, we would like to discuss it with you to understand how we can rectify the issue. You may exercise any of your rights in relation to your personal data by writing to us at one of the following addresses. To avoid delay in dealing with your request, please enclose with your signed letter a copy of your passport or identity card:

- UBS Swiss Financial Advisers AG, Löwenstrasse 49, 8001 Zurich, Switzerland
- UBS AG, Group Data Protection Office, PEZH NORD1 EUR2-039, Postfach, 8098 Zurich, Switzerland.

If you are not satisfied with UBS-SFA's response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

9. Security Note

We have in place appropriate technical and organizational measures to prevent unauthorized or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

10. 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.

11. Other provisions that are specific to Switzerland

List of UBS controller entities:

- **UBS Group AG:** Bahnhofstrasse 45, 8001 Zurich
- **UBS AG:** Bahnhofstrasse 45, 8001 Zurich, Aeschenvorstadt 1, 4051 Basel
- **UBS Switzerland AG:** Bahnhofstrasse 45, 8001 Zurich
- **UBS Business Solutions AG:** Bahnhofstrasse 45, 8001 Zurich
- **UBS Card Center AG:** Flughafenstrasse 35, 8152 Glattbrugg
- **UBS Fund Management (Switzerland) AG:** Aeschenplatz 6, 4052 Basel
- **UBS Swiss Financial Advisers AG:** Lowenstrasse 49, 8001 Zurich

Example of retention periods (cf. section 6):

In general, UBS-SFA will retain personal data for the period of your relationship or contract with UBS-SFA plus 10 years, reflecting the length of time for which legal claims may be made following termination of such relationship or contract. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period.

Due to requirements laid down by the Swiss Financial Market Supervisory Authority ("FINMA"), UBS-SFA is also obliged to record external and internal telephone calls of all employees engaged in securities trading. UBS-SFA 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.

UBS-SFA also stores all incoming and outgoing business and private communication data (in particular e-mails with attachments, chats, instant messaging) in a separate, protected electronic archive located in Switzerland for a period of 10 years.

12. Status of this privacy notice

This privacy notice was updated in April 2018. It is a notice explaining what UBS-SFA does, rather than a document that binds UBS-SFA or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you, such as through your account statement.