PRIVACY NOTICE FOR 1E PENSION SOLUTIONS 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.

Table of Content

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

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 UBS 1e Collective Foundation.

2 What types of Personal Data do we collect?

We collect the following personal data (to the extent permitted by applicable law):

- personal details and identification (such as your name, identification number, copy of your national identity card or passport), client ID, gender, language and citizenship / nationality information;
- Birth and family data (such as birth date, children, civil / marital status, death data, marriage date and spouse / partner);
- Professional profile (such as directorship / positions held, education, employment (incl. previous) and occupation;
- Physical and electronic address (such as email, address, domicile, phone);
- Financial and transaction (such as assets, bank account identifiers, income / salary / compensation, insurance, investment / transaction, investment objectives / preferences / behaviour, payroll details, pension planning, portfolio, salary information, total compensation details;

- Voice recording and communication;
- in some cases (where permitted by law), special categories of Personal Data, such as your health information (mental and physical health data, health data about connected persons)

We may use Personal Data for analytics and measurement (incl. machine learning) to process the above information, including profiling based on the processing of your Personal Data, for instance by looking at information we obtain via cookies and tracking technologies.

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 purpose of providing 1e Pension Solutions:

a) Client Onboarding process. For example:

• to confirm your identity and evaluate your application. For the processing of Personal Data in order to carry out checks regarding compliance with legal or regulatory requirements (e.g. to comply with provisions for the prevention of money laundering and fraud), please see Section e) below.

b) Client Relationship Management. For example:

• to manage our relationship, including communicating with you regarding the products and services we have purchased, to deal with customer service-related questions and complaints, to make decisions regarding your identity, to determine your whereabouts and to manage your relationship with us (in accordance with relevant legal requirements) in the event that we are unable to contact you after a period of time;

c) Product implementation and execution. For example:

• to provide pension products and services to you and for their proper execution;

d) Processing for the purpose of client acquisition and expansion of the business relationship. For example:

• to evaluate which products, services and events may be of interest to you and how they may be offered to you.

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 client onboarding process and at regular intervals thereafter (e.g. to comply with anti-money laundering and anti-fraud regulations);

• to comply with our on-going regulatory and compliance obligations (e.g., financial industry regulations, tax laws and to prevent money laundering), including in relation to recording and monitoring of communications, the disclosure of data to tax authorities, relevant supervisory authorities, other regulatory and government bodies and to investigate or prevent criminal offences;

• receive and handle complaints, requests or reports from you; and

• to respond to actual or potential proceedings, requests or investigations by the competent authorities or judicial authorities.

f) Other purposes. For example:

• for our prudent operational management (including compliance and risk management, technological support services, reporting, audits, system and product training, and similar administrative purposes);

• to carry out transactional and statistical analysis, as well as similar analyses; and

• to exercise our duties and/or rights to you or any third party.

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, the processing of your Personal Data will be one of the following grounds:

- necessary 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 stated above;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks, and make the disclosures to authorities, regulators and government bodies;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose;
- 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; 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;
- evaluate whether and how UBS may offer products, services and events that may be of interest to you;
- 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;
- receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
- take steps to improve our products and services and our use of technology and to conduct market research;
- cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
- 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 and regulatory requirements around the world; and
- certain situations when we make the disclosures referred 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.

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 staff 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. 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 transfer Personal Data to other financial services and similar companies as well as to advisors in order to fulfil our obligations to you. In particular, when providing products and services to you, to persons acting on your behalf or otherwise involved, including, where relevant, we transfer Personal Data to the following types of companies:

- payees, beneficiaries;
- other financial institutions;
- lawyers, experts, auditors, accountants and (re-)insurances who provide legal, auditing, accounting or insurance services to us.

5.2.2 Service Providers

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, 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

- Disclosure of Personal Data may be necessary for the assertion, exercise or defence of legal claims of us, its employees or other interest groups or to process enquiries from persons or their representatives;
- Authorized Notice Recipients, as required by applicable law or regulation.

6 How long do we store your data?

In general, we retain Personal Data in accordance with applicable Swiss law, which reflects the duration for which legal claims can be asserted after the termination of such business relationships.

We are also obliged to keep all correspondence and evidence of telephone calls in accordance with applicable Swiss law. If necessary, we must make this information available to the competent authorities.

If you request the deletion of your Personal Data from our databases, you can submit a request in accordance with the section 7 below, which we then check as described 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 addressed 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 send your request by post to Postplatz 11, 6430 Schwyz, Switzerland.

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.

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 October 2025. 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 1e Collective Foundation	Postplatz 11, 6430 Schwyz, Switzerland

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