PRIVACY NOTICE FOR CS FOUNDATION FOR EMPLOYEE SHARE PARTICIPATION SCHEMES – SWITZERLAND

DATA PROTECTION UNDER THE SWISS DATA PROTECTION LAW

To run our business, UBS processes information about natural persons ("**Personal Data**"), including information about our prospective, current, and former employees of our corporate clients ("**you**") to whom we offer our share plan administration services.

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 employee of a client serviced by Credit Suisse Foundation for Employee Share Participation Schemes, participating in your employer's share plans.

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 and citizenship information);
- Birth and family data (such as birth date);
- Physical and electronic address (such as email, address and employee ID);
- Financial and transactional data (such as your assets and award details);
- Online identify information (such as IP address / device ID and Website / application logs);
- Convictions and offences (such as screening search results).

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. We process Personal Data within applicable legal limitations, for the purpose of providing share plan administration solutions:

a) Onboarding:

- to verify your identity and assess your application.
- to perform legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud).

b) Relationship Management:

- to manage our relationship with you, including communicating with you in relation to the products and services you obtain from us, handling customer service-related queries and complaints, facilitating debt recovery activities, 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;
- to help us to learn more about you as a client, your preferences on the products and services you receive, 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, information we obtain via tracking technology and how you like to be contacted;
- to 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:

- 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;
- to 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 obligations regarding Personal Data storage, legal and regulatory compliance, audit activity and investigations.

d) Engaging in prospecting and business development and / or protecting and enhancing the UBS brand:

- 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;
- to ensure 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;
- to 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;
- to create audiences on various digital platforms allowing to display targeted marketing ads to you.

e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation:

- to carry out legal and regulatory compliance checks as part of the onboarding process and periodic compliance checks, including to comply with anti-money laundering regulations, fraud prevention and financial crime prevention sanctions country screening. This involves profiling based on the processing of your Personal Data, for instance by looking at how and from which geographic location you use applications, products, and services from us.
- to 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, apply a risk classification to ongoing business relationships, disclosures to tax authorities, financial service regulators and other regulatory, judicial, and governmental bodies or in proceedings and investigating or preventing crime. This involves profiling based on the processing of your Personal Data, for instance by looking at how and from which geographic location you use applications, products and services from us;
- to receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
- to reply to any actual or potential proceedings, requests, or the inquiries of a public or judicial authority.

f) Supporting, Enhancing and Maintaining UBS's technology:

- to 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;
- to analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.

g) Other purposes:

- 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, the safety of staff and visitors, as well as property and information located, stored on or accessible from the premises, to prevent, and if necessary, investigate unauthorized access to secure premises (e.g., maintaining building access logs and CCTV system images to prevent, detect and investigate a theft of equipment or asset owned by UBS, visitor or staff, or threats to the safety of personnel working at the office);
- to undertake transactional and statistical analysis, and related research; or
- to exercise our duties and/or rights vis-à-vis you or third parties.

We use both automated (including artificial intelligence) and manual methods to process your Personal Data for these purposes. Our automated methods often are related to and supported by our manual methods. For example, our artificial intelligence systems may analyse your data to identify patterns and trends, which are usually manually reviewed and interpreted by humans.

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 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 stated above 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 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. 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 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);
- 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, 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, 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.

We will keep your personal data for as long as you are our customer to allow us to provide you with the services and to meet our regulatory requirements, as specified in this document.

Once our relationship with you has ended, we will only keep your personal data for a period that is appropriate, which in many cases is up to 10 years after your account closes. The period we keep information for is often linked to the amount of time available to bring a legal claim, required by law or regulations, or for compliance and risk management.

We will keep your personal data after this time if we must do so by law, if there are existing claims or complaints that will reasonably require us to keep your information, or for regulatory reasons. If we do need to keep your information for a longer period, we will continue to protect that information. However, if you wish to have your Personal Data removed from our databases, you can make a request as described 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 addressed indicated in Section 7.2 at any time.

Where we process your Personal Data based on 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 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 Credit Suisse Foundation for Employee Share Schemes, Paradeplatz 8, 8001 Zurich, 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.

10 List of UBS entities covered by this Notice

Entity Name	Registered Address
Credit Suisse Foundation for Employee Share Participation Scheme	Paradeplatz 8, 8001 Zurich, Switzerland

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