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.

For the avoidance of doubt, we would like to clarify that this Notice does not alter any agreement applicable to your business relationship with us, including the General Conditions.

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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 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;
- Public registry (such as company register information), your online identity such as social and professional network information and communications data.

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;
- voice recording and communication data;
- 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 e-mail and 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.

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.

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:

- to verify your identity and assess your application (including the need for guarantees or other securitisation tools if you apply for credit)
- to perform 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:

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

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 in particular 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 (e.g. Microsoft 365 Copilot) 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 (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, 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. 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);
- 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

Subject to any agreement applicable to your business relationship with us (including the General Conditions), 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.

5.4 Specific information regarding transfers and access to client identifying data in relation with UBS Switzerland AG's and UBS AG's General Terms and Conditions

To receive and use services, client information may be transmitted to, stored and otherwise processed by UBS Group entities and third parties located in Switzerland, the EEA, the UK, India and Singapore.

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 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:

- 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 Investment Bank clients send an e-mail to sh-ibdiso@ubs.com;
- For Asset Management clients send an e-mail to dl-am-cc-inst-ch-cserv@ubs.com;
- Send and e-mail to 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.

7.3 Recording of calls for Wealth Management and Personal & Corporate Banking clients of UBS Switzerland AG

If you are a Wealth Management and/or Personal & Corporate Banking client of UBS Switzerland AG, your calls are voice recorded, where required by law and/or, to the extent that you agree to such recording, for client relationship management purposes and/or for other purposes such as for training and education and compliance and risk management.

If you do not wish your calls to be recorded for client relationship management purposes, please inform your UBS contact. Alternative, non-recorded voice communication channels are available (e.g. Zoom).

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 2026. 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 Group AG	Bahnhofstrasse 45, Zurich, 8001, Switzerland
UBS AG	Aeschenvorstadt 1, 4502 Basel, Switzerland Bahnhofstrasse 45, 8001 Zurich, Switzerland
UBS Switzerland AG	Bahnhofstrasse 45, 8001 Zurich, Switzerland
UBS Asset Management Switzerland AG	Bahnhofstrasse 45, 8001 Zurich, Switzerland

UBS Fund Management Switzerland AG	Aeschenvorstadt 1, 4051 Basel, Switzerland

11 EU representative

UBS designated the below 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

12 UK representative

UBS designated the below entity as the UK representative in compliance with Art. 27 UK GDPR

UK Representative Entity	Registered Address
UBS AG London Branch	5 Broadgate, London, EC2M 2QS, United Kingdom

13 China representative

UBS designated the below entity as the China representative in compliance with Art. 53 PIPL

China Representative Entity	Registered Address
UBS Business Solutions (China) Co., Ltd.	Room 301-304, 601-602, 488 Middle Yin Cheng Road, Pudong New District, Shanghai, 200120, China

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