



# California Consumer Privacy Notice

## SPECIAL NOTIFICATION TO CALIFORNIA RESIDENTS REGARDING THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

### 1. Data protection under the CCPA

Effective January 1, 2020, the California Consumer Privacy Act (CCPA) allows certain California residents (called consumers) new rights related to their personal information. In compliance with the CCPA, this privacy notice provides you with information about the personal information UBS collects, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information may be shared. As noted below, eligible California consumers have the right to submit a request to know what information has been collected about them and for deletion of information under certain circumstances.

**This privacy notice applies to California consumers who are not clients, prospects, or employees of UBS.** If you are a California consumer who is a current or former client of UBS, your personal information is already protected under US Federal privacy law (the Gramm Leach Bliley Act or "GLBA"), and this notice is not applicable to you. Please click [here](#) for a copy of the relevant **Client Privacy Notice** that applies to you. If you are an employee of UBS, click [here](#) for the **Employee Privacy Notice**.

Please note that 'personal information' 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 information in a transparent manner, we want to inform you:

- why and how UBS collects, uses, and stores your personal information; and
- what your rights and our obligations are in relation to such processing.

### 2. What types of personal information do we collect?

For California consumers who are not current or former clients or employees of UBS ("**UBS**," "**we**," "**our**," or "**us**"), we may collect and process publicly available personal information about you including but not limited to:

- your name, phone number, physical and electronic and/or email address;
- where applicable, publicly available professional information about you, such as your job title and work experience;
- information about your publicly known interests, educational background and memberships;
- any records of phone calls between you and UBS;
- 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). When you visit a UBS website, that website will contain additional information about how we use your information while you are visiting that website.

In some cases, we collect this information from different sources, including, but not limited to:

- service providers;
- public websites such as social media sites;
- public registers and public administration or other third-party sources;
- data brokers, such as wealth screening services and financial client prospect services;
- UBS affiliates; and
- public events.

Additionally, where you are an institutional or corporate client or investor, we may also collect publicly available organizational information about your directors, employees, or shareholders, such as title, company email, company telephone and company address information.

### **3. Purposes of processing personal information**

We always process your personal information for a specific purpose and only process the personal information relevant to achieve that purpose. We do not sell your personal information.

In particular, we may process your personal information for the following purposes:

- a) evaluating whether and how UBS may offer products, services and events that may be of interest to you;
- b) communicating with you in relation to the products, services and events that may be of interest to you;
- c) helping us to learn more about you as a prospective customer, the products, services and events you may be interested in receiving, including profiling based on the processing of the personal information we collect, for instance by looking at the types of the products, services and events you may have previously shown an interest in, how you like to be contacted, etc.;
- d) taking steps to improve our products, services and events 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 methods to communicate them, or learn about other the products, services and events we can provide;
- e) contacting you for direct marketing purposes about the products, services and events 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;
- f) 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;
- g) undertaking transactional and statistical analysis, and related research;
- h) for the UBS Group's prudent operational management (including products training and similar administrative purposes); and
- i) any other purposes we use notify to you from time to time.

### **4. Who has access to personal information and with whom are they shared?**

#### **4.1. With the UBS Group**

We may share personal information with other UBS Group companies in order to establish a business relationship with you, to offer services and products to you, or to market our products and services to you.



#### **4.2. Service providers**

In some instances, we may share personal information with our suppliers, including UBS Group companies and other business partners who provide services to us, such as IT and hosting providers, event and marketing providers, communication services and printing providers, and others. When we do so, we take steps to ensure they meet our data security standards, so that your personal information remains secure.

#### **4.3. Public or regulatory authorities**

If required from time to time, we disclose personal information 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.

#### **4.4. Others**

- If our business is sold to another organisation or if it is re-organised, personal information will be shared. We will usually also share personal information 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 will disclose personal information where required 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. How long do we store your data?**

We will only retain personal information 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 information depending on its purpose, such as facilitating prospective client relationship management, and responding to legal claims or regulatory requests.

#### **6. Your rights under the CCPA**

If you are a current or former client of UBS, your privacy rights are already protected under federal law and you have already received the privacy notice (a copy of which can be found [here](#)).

If you are a California resident who is not a current or former client, prospect or employee of UBS, you have a right to ask UBS to tell you what personal information we have about you. You also have a right to ask us to delete your personal information. These rights are not absolute under the CCPA (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 within the time frame required by law.

You can exercise the rights set out above using the details in section 7 of this notice.

#### **7. Exercising your rights**

If you would like to submit a request regarding your personal information, please fill out the data subject request form ([click here](#)), attach the appropriate documents as listed in the form to verify your identity, sign it and follow the instructions to submit. UBS will review the submitted form and the documents you provide to verify your identity before your request can be completed. You may be asked to provide additional information if we are unable to verify your identity. You may designate an authorized agent to submit a request on your behalf by completing the appropriate section of the request form.

Alternately, you can contact us toll free at 800-354-9103 for assistance.



## **8. Security Note**

To the extent UBS has personal information about you in our online systems, we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access. As complete data security cannot be guaranteed for communication via emails, instant messaging and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

## **9. Status of this privacy notice**

This privacy notice was updated in May 2022. It is a notice explaining what UBS does, rather than a document that binds UBS or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will ensure that a revised version is posted in the appropriate location on the UBS website.

## **10. Contact**

If you have any questions regarding this privacy notice, please contact the UBS Group Data Protection office by emailing [dpo-us@ubs.com](mailto:dpo-us@ubs.com).