



CHINA CHARITABLE FOUNDATIONS

DATA PROTECTION UNDER THE PERSONAL INFORMATION PROTECTION LAW

To run our charitable foundations, UBS processes information about natural and legal persons (“**Personal Data**”), including information about persons involved as donors, grant applicants/grantees or beneficiaries and related persons (“**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**”) collect, 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 donor, a grantee, representative of applicant organisations (e.g. charities, organisations with a charitable purpose, foundations, associations), such as project leaders, contact persons, board of directors members and any other person involved in the charitable projects managed by any of the UBS entities listed in Section 10.

2 What types of Personal Data do we collect?

In the context of our charitable projects management activities, we collect and process the following personal information, where applicable:

- Personal details & identification (full name, gender, ID card, photo, signature);
- Birth and family (birth certificate, birth date, nationality, civil/marital status);
- Professional profile (applications and hiring information, CV/Career details, directorship / positions held, education, employment history, occupation);
- Physical and electronic address (private and business address, email address, fiscal residence, phone number);
- Financial and transaction (financial crime prevention scoring, income/salary/compensation, insurance)
- Data concerning health (physical health)
- Race and ethnicity

- Political (politically exposed person)
- Convictions and offences data (public and proprietary database search results).

We receive your personal data from you directly or from persons providing it on your behalf in the context of your donation or grant request and from public registers or other third-party and public sources, such as fraud prevention agencies. Without receiving your Personal Data we may not be able to process your donation or grant request.

3 For which purposes do we process your Personal Data and what legal basis do we rely on?

3.1 Purposes of processing

We collect and process your Personal Data for the purpose of:

- Accepting and managing donations;
- Evaluation of grant requests for adherence to the funding regulations (including checking history of recent applications and grants to avoid recurring financing);
- Providing grants to selected organisations or individuals and managing the relationship as and when required;
- Compliance & risk management and / or crime prevention, detection & Investigation; including to comply with applicable charity law
- Enabling the participation of UBS Group stakeholders in charitable events;
- Accounting and Financial Audits.

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 contracts and agreements with you, or for carrying out our rights and obligations under such a contract;
- required to meet our legal or regulatory responsibilities, including when we conduct the regulatory compliance checks;
- in some cases, we have obtained your consent (for instance where required by law);
- in some cases, necessary for the performance of a task carried out in the public interest;

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 process your donation or grant request.

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. 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 above. 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 Service Providers

In some instances, we also share Personal Data with our suppliers, such as property managers and debt collection agents, 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 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).

5.3 Data transfers to other countries

The Personal Data transferred within or outside UBS and the UBS Group as set out above, 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.

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 10 years.

7 What are your rights and how can you exercise them?

7.1 Your rights

You have a right to access, to obtain information regarding your Personal Data that we process, 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 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). If you believe that any information, we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

7.2 Exercising your rights

To exercise the above rights, please contact:

- UBS Optimus Foundation (Switzerland) Beijing Representative Office: UBS-Optimus-Foundation-China@ubs.com

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-cn@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

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 Optimus Foundation (Switzerland) Beijing Representative Office	Unit F1211B-F1218A Winland International Finance Center, No. 7 Finance Street, Xicheng District, Beijing, 100033, China

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