Your privacy is important to us. We take care to protect your personal data that we will collect, process and use and shall abide by the principle of responsibility in accordance with authority, principle of purpose limitation, principle of selective consent, principle of minimization, principle of guaranteed security, principle of data subject participation and principle of openness and transparency. At the same time, we commit to taking appropriate security measures commensurate with the industry’s commonly adopted safety standards to protect your personal data.

Please read and understand the contents of this Privacy Notice (the “Notice”) before using our products or services.

This Notice will help you understand the following:

1) Purpose and scope of this Notice
2) Content and purposes of information collected
3) Collection and storage of information
4) Sharing, transfer and disclosure of information collected
5) Global transfer of information collected
6) Security measures taken to protect the personal information collected
7) Your rights
8) Complaints and communication channel
9) Updating of this Notice

1. Purpose and scope of this Notice

We are committed to safeguard personal data that we collect. This Notice is published to describe the types, method, frequency and scope of collection, and method and time limit of storage, of information collected from you, and the purposes of possible collection, sharing or disclosure of such information. We also outline the reasonable safety measures taken to secure your information.

The terms of this Notice are subject to any additional disclaimer or other contractual terms between you and UBS and any applicable mandatory laws and regulations.

2. Content and purposes of information collected

UBS (“UBS”, “we”, “our”, or “us”) will, depending on the product or service we provide to you (if any), collect and process personal data about you.

Personal data refers to information which can be recorded electronically or otherwise, individually or in combination with other information, that identifies a particular natural person or reflects the activities of a particular natural person, such as name, gender, address, e-mail address, telephone or fax number.

The personal data we may collect about you include:

- personal details such as your name, identification number, date of birth, KYC documents (including a copy of your national identity card or passport), phone number, physical address, email 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 applicable, 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;
• any records of phone calls between you and UBS;
• identifiers we assign to you, such as your client or account number, including for accounting purposes;
• 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; and
• in some cases (where permitted by law), special categories of personal data, such as your health information, racial or ethnic origin, religious beliefs, and, to the extent legally possible, information relating to criminal convictions or offences.

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, and agents. Additionally, where you are an institutional or corporate client or investor, we will also collect information about your directors, employees or shareholders. Before providing UBS with this information, you should provide a copy of this Notice to those individuals.

UBS will only collect and use your personal data for the purposes and in the business scenarios mentioned below and upon your consent. If we intend to use your personal data for purposes beyond the scope of your original authorization, we will obtain your prior consent before processing such personal data.

a) client on-boarding processes, including to verify your identity and assess your application (including the need for guarantees or other securitization tools) if you apply for credit, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud);

b) providing 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;

c) managing 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 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;

d) helping us to learn more about you as a customer, the products and services you receive, and other products and services you may be interested in receiving, including profiling based on the processing of your personal data, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;

e) taking 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 our existing products and services or learn about other products and services we can provide;

f) contacting 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;

g) 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;

h) ensuring the security of your data;

i) undertaking transactional and statistical analysis, and related research;

j) underwriting;

k) for the UBS Group’s prudent operational management (including credit and risk management, insurance, audit, systems and products training and similar administrative purposes).

At the time of your account opening with us or at any other time as prescribed by applicable laws, we will inform you and seek your express consent about the collection and use of your sensitive personal data, if any. In particular, we will inform you about which of your sensitive personal data will be needed to provide you with our core products and services and which will be used for ancillary products and services, and about the consequences in case you do not wish to give us your consent for any of the said products and services. Rest assured that we will not bundle your consent for the different types of services and products offered.

In collecting and using your personal data, UBS further undertakes that the following will not occur:

1) collecting your personal data without your prior consent;

2) continuing to collect your personal data after your express refusal;

3) collecting and using personal data beyond the scope of your authorization;

4) changing the scope of personal data collection without your consent;

5) continuing to frequently solicit your consent, causing interference with your normal use (unless such personal data is necessary for the provision of services to you and your refusal to provide the same will materially affect your use of UBS’s services), after you have expressly rejected the request for personal data collection or withdrawn your consent;

6) breaching this agreement with you and not collecting and using personal data in accordance with the rules in this Notice.

3. Collection and storage of information

Your personal data will be stored in accordance with the laws and regulations of the location of the relevant UBS entity. We will store your personal data for such period required by applicable laws and regulations. After the expiration of this period, we will delete your personal data in a timely manner, except for information that you cannot be personally identified from and which cannot be de-anonymized (“Anonymized Data”).

4. Sharing, transfer and disclosure of information collected

We will keep your personal data strictly confidential. However, UBS may share, transfer or disclose your information to UBS affiliates and branches, agents, third party service providers or other authorized partners within or outside your location for the purpose of providing our services to you and other related purposes. Such sharing, transfer and disclosure include the following circumstances:

1) Sharing, transfer and disclosure of your personal data upon your express consent.

2) Disclosure of your personal data obtained and retained by us in accordance with legal and regulatory requirements.

3) Sharing with UBS affiliates and branches. We will only share personal data necessary for UBS group’s internal operations (including, but not limited to, credit and risk management, compliance reviews, incident investigations, statistical data, analysis, processing, handling systems, services, product design, research and development, auditing, insurance, customer activity planning, and organizational and administrative purposes), and such recipient will also be subject to confidentiality obligations. If UBS members and branches intend to change the abovementioned purposes for the use of personal data or exceed your scope of authorization, we will seek your consent separately.
4) Sharing with authorized partners, including agents and third party service providers, provided that such sharing is limited to the purposes of use of personal data as set out in this Notice and necessary to provide such products or services. We will enter into agreements with authorized partners requiring them to take confidentiality and security measures in processing your personal data and restricting them from using such personal data for any other purposes.

5) If the abovementioned sharing and disclosure of personal data involves cross-border transfer of personal data, please refer to the "Global transfer of information collected" section of this Notice.

Notwithstanding the foregoing, you acknowledge that your information may be disclosed to government agencies or entities, regulators, law enforcement, or other competent bodies under applicable laws, regulations, court decisions or adjudications, or in accordance with any guidelines issued by regulatory, law enforcement or other competent authorities, or in accordance with similar procedures required or permitted by applicable laws. In such circumstances, UBS does not need your authorization or consent to collect or use or share your personal data.

5. Global transfer of information collected

In principle, personal data that we collect and generate within the People's Republic of China will be stored in the People's Republic of China. However, as we may use UBS's resources and servers globally to provide services to you, UBS may, where necessary, disclose your information to UBS affiliates and branches and their agents, third party service providers and other authorized partners outside of the People's Republic of China, in order to comply with the requirements of laws and regulations and achieve the purposes as set out in this Notice. We will comply with applicable laws and regulations to protect the security of your data transfer and ensure that recipients of your information maintain an adequate level of data protection through measures such as agreements entered into with such parties.

6. Security measures taken to protect your personal data

UBS will take all reasonable and feasible technical, organizational and managerial security measures to protect your personal data from unauthorized access, public disclosure, misuse, loss or destruction. Our measures include, but are not limited to, encrypted transmission, firewall, encrypted storage, physical access control, information access authorization control, and ad hoc auditing.

We will take all reasonable and practicable measures to ensure that irrelevant personal data is not collected and that personal data collected is only retained during the period prescribed by laws and regulations.

UBS undertakes to inform you in the event of a personal data security incident in accordance with the requirements of laws and regulations.

7. Your rights

You have the following rights in relation to your personal data:

1) Check whether UBS hold any of your personal data and request UBS to provide you with a copy of any of such personal data;

2) Request UBS to correct or update any of your personal data

3) Request UBS to delete your personal data in the following situations:
   a) If we process personal data in violation of laws and regulations;
   b) If we collect and use your personal data without your consent;
   c) If we collect personal data in breach of our agreement with you;
   d) If we no longer or are unable to continue to provide services to you.

4) Withdraw or change the scope of your consent. When you withdraw your authorization, we will no longer continue to process the relevant personal data unless so authorized by the law. However, your decision to withdraw your consent will not affect the processing of personal data that has been previously conducted based on your authorization.
5) Appeal to the China International Economic and Trade Arbitration Commission for arbitration in case you are not satisfied with any of our responses to your requests.

You can exercise any of the rights set out in 1-4 above by using the "Complaints and communication channel" of this Notice.

8. Complaints and communication channel

Should you have any questions about this Notice, you want to exercise any of your rights as described above or have any related complaints or comments, you may contact us through your usual client advisor/client relationship manager if you are a UBS client and/or through the following method. We will review the issues as soon as possible and address them as soon as we verify your identity.

Dr. Gabriele Holstein
Group Data Protection Officer
UBS Business Solutions AG
P.O. Box
8098 Zürich
Switzerland

Email address: dpo-apac@ubs.com

If you are not satisfied with our response, in particular, if our personal data processing has harmed your legitimate rights and interests, you may contact us through the above contact details to resolve the matter through friendly negotiation. In the event such negotiation fails, either party may submit the dispute to the China International Economic and Trade Arbitration Commission for arbitration in accordance with the arbitration rules in force at that time. The place of arbitration is Beijing. The arbitral award is final and binding on both parties.

9. Updating of this Notice

We may update, revise and change the contents of this Notice. You should visit UBS website frequently to understand the current privacy notice, as the terms of this Notice are closely related to you.

Where there is a material change to this Notice, we will promptly publish a statement of change on UBS website. Material changes to this Notice include, but are not limited to, the following situations:

1) Material changes to our service model. For example, a change in the contents and purposes of information collection, the collection and storage of information, the main recipients of information collected, and the cross-border transfer of personal data.

2) Material changes to our ownership structure or organizational structure. For example, business reorganization, and change in ownership due to liquidation and mergers and acquisitions.

3) Material changes to our data security capabilities and information security risks.

4) Material changes to your rights to participate in the processing of personal data and the manner of exercising such rights.

5) Changes to our Group Data Protection Office and its relevant person-in-charge, contact details and complaint channels.

6) Other changes arising out of business development needs which may have a significant impact on your personal data rights.

The updates, amendments or changes we make in accordance with the above terms shall take effect immediately and will not require your signature. If you continue to use our services on or after the effective date of the change, the above updates, amendments or changes shall be binding on you.

This Notice is issued by the following UBS legal entities:

- UBS China Limited
- UBS Securities Co. Limited
UBS Futures Co. Limited
UBS Asset Management (Shanghai) Limited
UBS Rui Hua Overseas Investment Fund Management (Shanghai) Limited

For basic information about the legal entities above please see https://www.ubs.com/cn/en.html.