

Data Privacy Notice México

NOTIFICATION TO UBS CLIENTS

1. Data protection under Federal Data Protection held by Private Parties Act

UBS takes your privacy seriously. UBS ASESORES MÉXICO, S.A. DE C.V., UBS CASA DE BOLSA, S.A. DE C.V., and UBS SERVICIOS, S.A. DE C.V., (jointly and severally, hereinafter, the "**Responsible**" and/or "**UBS**", "**we**" or "**us**"), located at Avenida Pedregal No. 24 – Piso 11, Colonia Molino del Rey, Ciudad de México, México, 11040, in compliance with the provisions of the Ley Federal de Protección de Datos Personales en Posesión de los Particulares (the Mexican Federal Data Protection held by Private Parties Act, hereinafter, the "**Act**"), hereby provides you with this privacy notice (the "**Notice**") which purpose is to notify the terms and conditions of the rights you have and the treatment of any information that relates to an identified or identifiable natural person, that could be considered as (i) Simple Personal Data, (ii) Financial Personal Data, and/or (iii) Sensitive Personal Data (hereinafter, jointly and severally as a general reference of the three types of personal data "**Personal Data**", in the understanding that UBS collects no Sensitive Personal Data from its actual or prospective clients) furnished by the holder thereof, assuming the responsibility for its use, handling, storage and confidentiality.

With regards to "**Client**" and/or "**Prospect**" the meaning of such terms means an individual that was, is, or may be Client and/or Prospect, or was, is or may be an individual that UBS provides or will provide him/her financial services.

The relationship with the Client and/or Prospect is activated by the documentation that establishes such relationship between the Client and/or Prospect and UBS.

2. What types of Personal Data do we collect?

UBS will, depending on the product or service we provide to you (if any), collect and process Simple or Financial Personal Data about you including, but not limited to:

- personal details such as your name, identification numbers such as Citizen Number (CURP) and Federal Tax Payer Number (RFC), date of birth, KYC documents (including a copy of your national identity card or passport, source of wealth), phone number physical and 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 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;
- where applicable, details of your nomination of a mandate;
- 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
- As aforementioned, UBS collects no Sensitive Personal Data from its actual or prospective clients, such as your 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, however, in case it becomes necessary (permitted or required by law), UBS will, as defined in the Act request your written and express consent to do so.

UBS collects certain of the above Personal Data types in relation to prospective clients. This Personal Data is relevant to establish and build relationships with a view to entering into a contractual agreement with them. The above mentioned Personal Data mentioned are collected from:

- Information that you directly provide;
- Information that UBS receives from the entities that are part of the Corporate Group of the Client and/or Prospect.
- Information that UBS may receive from third parties such as past services providers.
- Information UBS may collect from public registers (which, depending on the product or service you receive and the country of the UBS entity with which you have a contractual relationship, may include beneficial ownership and other registers), public administration or other third-party 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), dependants 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.

3. For which purposes do we process Personal Data?

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 for the following purposes:

- a) client on-boarding processes, including to verify your identity and assess your application (including the need for guarantees or other securitisation 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, 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;

- 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) 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, judicial and governmental bodies or in proceedings, and investigating or preventing crime;
- g) ensuring the safety of our customers, employees and other stakeholders;
- h) undertaking transactional and statistical analysis, and related research;
- i) underwriting;
- j) for the UBS Group's prudent operational management (including credit and risk management, insurance, audit, systems and products training and similar administrative purposes); and
- k) any other purposes we notify to you from time to time.

In addition, we may process your Personal Data for the following secondary purposes, which are not necessary for the provision of services to you, but which allow us to improve our services to you:

- a) 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.

In case you do not want your data to be processed for these additional purposes, please let us know by contacting us as indicated in section 6 below.

4. Who has access to Personal Data and with whom are they shared?

Access to Personal Data within UBS will be limited to those who have a need to know the information for the purposes described in this Notice, and may include its Managers and their representatives, and personnel in the areas of Compliance, Legal, Finance, and Accounting.

4.1. With the UBS Group

We may transfer and share the information of your Personal Data to national or foreign affiliates and subsidiaries belonging to its business group, which share internal processes and policies, for its corporate management and in order to ensure a consistently high service standard across our Group, and to provide you with better services and products.

4.2. Third Parties

When providing products and services to you, we will share Personal Data with persons acting on your behalf or otherwise involved in the transaction (depending on the type of product or service you receive from us), including, where relevant, and to the extent permitted by the applicable regulation, and in the understanding that these are obliged to maintain the confidentiality of the provided Personal Data and comply with the terms and conditions of this Notice, 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 UBS for you;

- payment recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks (including custodian banks);
- clearing houses, and clearing or settlement systems; and specialised payment companies or institutions such as SWIFT;
- (if you hold a credit card with us) credit card associations, and other card payment and platform providers;
- 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; and
- any introducing broker to whom we provide introductions or referrals.

4.3. Service providers

In some instances, we also share Personal Data with our suppliers, including UBS Group companies and other business partners who provide services to us, such as IT and hosting providers, marketing providers, communication services and printing providers, debt collection, tracing lost accounts, debt recovery, fraud prevention, and credit reference agencies, and others. When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure and processed in compliance with the terms of this Notice.

4.4. Public or regulatory authorities

If required from time to time, we disclose Personal Data to public and judicial authorities, regulators or governmental bodies and in proceedings, 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.

4.5. Others

- If our business is sold to another organisation or if it is re-organised, Personal Data will be shared so that you can continue to receive products and services. We will usually also share Personal Data 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.
- If you exercise your right to data portability, we will usually disclose your Personal Data to an intermediary that facilitates data portability in accordance with applicable law and regulations.
- We will disclose Personal Data 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. International transfers of Personal Data

The Responsible gives notice that to comply with the purposes set out in section 3, the Responsible can transfer Personal Data to third parties, in the understanding that these are obliged to maintain the confidentiality of the provided Personal Data and comply with the terms and conditions of the Notice. The Responsible may transfer the collected Personal Data to UBS' national or foreign entities or subsidiaries, which share internal policies and processes



for the proper corporate management. Furthermore, if such third parties are located inside or outside México, to the extent that we require your consent for any such transfer, we understand that by the terms of this Notice that we have obtained your implied consent absent any specific withdrawal of such consent by you, as indicated in section 11 below.

6. Means and Procedures for exercising Access, Rectification, Cancellation and Objection Rights.

If you or your legal representative would like to access, rectify, delete, cancel, copy, limit, suppress or object your Personal Data or require that the same may no longer be used by UBS, (hereinafter, the "ARCO Rights") in accordance with the Act, please contact the Client Complaint Handling Unit (CHU) at SH-DerechosARCO@UBS.com mentioning your name, address or any other mean to communicate the response to your request and the purpose of such request, specifying which ARCO Right established in the Act do you want to exercise. Upon receipt of such request, UBS will consider it in accordance with the Act, its Regulations and the internal privacy policies of UBS and shall respond to your request within a period of twenty (20) business days from receipt. It is important to bear in mind that certain Personal Data may not be subject to access, rectification, suppression, and copy and deletion rights, as provided in data protection and other laws and regulations.

If you have any question or doubt in connection with the manner in which UBS processes your Personal Data, please contact the Group Data Protection Office by sending an email to dpo-americas@UBS.com

7. Limitations on the use and disclosure of Personal Data

You may at any time revoke the consent granted to us for processing your Personal Data for a secondary purpose related to the direct marketing of our products to you, and limit any use or disclosure thereof. In addition to the procedure established in the immediately preceding section, you may impose limitations on the secondary use or disclosure of your Personal Data by sending an email to SH-DerechosARCO@UBS.com, containing a request to be registered in the "**Advertising Exclusion List**", in order not to receive promotional information about our products and services.

If you are not satisfied with any aspect of the processing of your Personal Data by UBS, 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 or the exercise of your ARCO rights, you can contact the Group Data Protection Office by emailing dpo-americas@ubs.com or using the contact details that can be found at: www.ubs.com/mexico.

8. Security Note

We have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the Personal Data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

9. Changes to your Personal Data

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes or you would like to make any amendment to the information please inform us of the change as soon as possible.

10. Changes to this Notice

This Notice was updated in July 2020.

UBS shall modify this Notice with the purpose to improve the security in the treatment of your Personal Data, incorporating new measures that are provided by the law or the regulations. Any amendment or update to this Notice, we will make it available to you via www.ubs.com/mexico.



11. Consent

By providing you with this Notice, you consent to the treatment of your Personal Data by UBS as described in this Notice unless you provide an express objection, by sending an email to SH-DerechosARCO@UBS.com

Your consent applies to your Personal Data, whether the consent is provided as a result of this Notice; personally or through any third party; or through any other electronic, optic, sound, audio visual means, or through any other technology or means available to UBS. It shall not be necessary to obtain an express consent for processing the Personal Data if it is aimed at performing the obligations arising from a legal relationship between you and UBS, or in respect of the events referred to in Article 10 of the Act, including but not limited to fulfilling obligations under a legal relationship between you and UBS. All of this is without prejudice to your right to exercise the ARCO Rights upon the terms of the Act, and to exercise any right through the communication process established in this Notice.

By providing any third-party Personal Data to UBS, you further confirm that you have provided the Third Party with a copy of this Notice, and have obtained their consent to any handling of their Personal Data by UBS.