

PRIVACY NOTICE FOR CLIENTS – RUSSIA

To run our business, UBS processes information about individuals (“**Personal Data**”), including information about our current and former clients (“**you**”).

UBS takes your privacy seriously. This Privacy Notice (“**Notice**”) contains information on what Personal Data the UBS entity in Russia referred to 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.

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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 in the Russian Federation 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 may 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.

For former and current clients or prospective clients with whom we are taking steps to enter into a contractual 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 or partner;
- 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;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, partner or account number, including identifiers for accounting purposes;
- when you access UBS websites or our applications, 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). 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 political opinions, religious or philosophical beliefs, and to the extent legally possible, information relating to criminal convictions or offences.

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](#).

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 contractual 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.

We might also collect certain of the above Personal Data types in relation to your business relationship, such as your additional card holders or account holders, business partners (including other shareholders, or beneficial owners), dependants 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 owner. Before providing UBS with this information, you should provide a copy of this Notice to those individuals.

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. For example:
 - to verify your identity and assess your application (including the need for guarantees or other securitisation tools if you apply for credit). For 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. For example, 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;
 - 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, 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.
- c) Product implementation and execution. For example, 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;
 - perform underwriting.
- d) Engaging in prospecting and business development and / or protecting and enhancing the UBS brand. For example, to:
- evaluate whether and how UBS may offer products, services and events that may be of interest to you;
 - 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.
- e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation. For example, to:
- carry out legal and regulatory compliance checks as part of the onboarding process, including to comply with anti-money laundering regulations and fraud prevention;
 - 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, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime;
 - receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
 - reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority;
 - prevent and detect crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks.
- f) Supporting, Enhancing and Maintaining UBS's technology. For example, 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.
- g) Other purposes. For example:
- for the UBS Group's prudent operational management (including credit 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 as well as property and information located or stored on the premises, to prevent, and, if necessary, investigate unauthorized physical access to secure premises (e.g., maintaining building access logs and CCTV system images);
- to undertake transactional and statistical analysis, and related research; or
- to exercise our duties and/or rights vis-à-vis you or third parties.

3.2 Basis for processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- 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;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks and make the disclosures to authorities, regulators and government bodies;
- in connection with your involvement in constitutional, civil, administrative, criminal court proceedings, and court proceedings in arbitration courts;
- necessary to process of Personal Data that are subject to publication or compulsory disclosure in accordance with federal laws, in such case we will explain to you the legal consequences if you refuse to provide your Personal Data;
- required for the protection of life, health, or other vital interests of the data subject if it is not possible to obtain consent;
- the processing is necessary for the establishment, exercise or defense of a legal claim or;
- we have obtained explicit consent (for instance where required by law).

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:

- you have given your explicit consent to us to process that information (where legally permissible);
- to the extent provided by law, the processing is necessary to carry out our obligations, such as Anti Money-Laundering;
- the processing of personal data is necessary in order to exercise your or a third party's rights to be established or exercised, and in connection with the administration of justice.

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 and the UBS Group

We usually share Personal Data with other UBS Group companies, for the purposes indicated in section 3.1, in order to ensure a consistently high service standard across our group, and to provide services and products to you.

5.2 Outside UBS and the UBS Group

5.2.1 Third Parties

We share Personal Data with other credit and financial services institutions, 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);
- (if you hold a credit card with us) 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. Third party 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, or 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:

- 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 legitimate recipient required by applicable laws or regulations.

5.3 Data transfers to other countries

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 your consent or other exceptions provided by Russian law.

A list of the countries in which UBS and the UBS Group operate can be found [here](#).

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 Retention Schedule.

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.

However, 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 obtain information and to obtain a copy of your Personal Data as processed by UBS. 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:

- request the clarification, erasure and/or blocking of your Personal Data;
- request information about personal data processing;
- 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 emails to you, or by emailing us at the address indicated in Section 7.2 at any time.

UBS will honour such requests or withdrawal 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:

- write to us to the following address: UBS Switzerland AG, Quality Feedback / Direktion, Postfach, 8098 Zürich, Switzerland, if you are a Wealth management Client of UBS Switzerland AG. To avoid delay in dealing with your request, please enclose with your signed letter a copy of your passport or identity card;
- send an e-mail to sh-ibdiso@ubs.com, if you are an Investment Banking client of OOO UBS Bank;
- send an e-mail to SH-HR-EUGDPR-SNOW@ubs.com, if you are a former UBS employee or candidate.

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.

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 December 2021. 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
OOO UBS Bank	2/2 Paveletskaya Ploshchad, Moscow, 115054, Russia

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