



PRIVACY NOTICE FOR CLIENTS – SINGAPORE

DATA PROTECTION UNDER THE SINGAPORE PERSONAL DATA PROTECTION ACT (PDPA)

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 entities in Singapore 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 Singapore 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 your biometric information, 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.

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.

UBS may also collect certain of the above Personal Data types or information you might choose to provide us in relation to your role as a donor when using our services or as a shareholder of UBS Group AG.

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;
 - undertake transactional and statistical analysis, and related research.
- 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);
 - testing and calibrating analytical models. In such case only pseudonymized data are used;
 - 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 to perform our contractual obligations towards you or to enter into or conclude a contract with you or for carrying out our obligations under such a contract;
- necessary to comply with our legal or regulatory obligations that are required by law, such as tax reporting requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as responding to an emergency that threatens the health or safety of the individual or another natural person;
- necessary for business improvement purposes to the extent permitted under the PDPA, such as to improve new processes for business operations in relation to UBS's services;
- where we have obtained your prior consent;
- necessary for one or more of the specific purposes deemed by law to be in the legitimate interests of organisations (PDPA, First Schedule, Part 3, Para 2-10 - "**Prescribed Legitimate Interests**"). Some of these Prescribed Legitimate Interests which are necessary for UBS include the following:
 - i. for investigation or proceedings (including the establishment, exercise or defence of a legal claim);
 - ii. for UBS to obtain legal services.

- necessary for the general legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms (PDPA, First Schedule, Part 3, Para 1 - “**General Legitimate Interests**”). Examples include processing necessary to:
 - i. manage our relationship with you and to 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 (with the exception of direct marketing, i.e., sending of unsolicited marketing material for which we would obtain your consent);
 - ii. evaluate whether and how UBS may offer products, services and events that may be of interest to you;
 - iii. prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of UBS premises;
 - iv. receive and handle complaints, requests or reports from you or third parties made to designated units within UBS or the UBS Group;
 - v. take steps to improve our products and services and our use of technology and to conduct market research;
 - vi. cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
 - vii. make disclosures for the purposes referred to in Section 5 below, such as providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our clients, employees and other stakeholders satisfied.

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 With UBS and the UBS Group

We may share Personal Data with other UBS Group companies 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

When providing products and services to you, we may share Personal Data with persons acting on your behalf. For the purposes listed in section 3.1 above, and to the extent permitted under applicable law, we may also transfer Personal Data to third parties outside UBS and the UBS Group, such as:

- 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;
- Third party service providers, who are contractually bound to confidentiality, such as IT system or hosting providers, cloud service providers, database providers, consultants (e.g., lawyers, tax accountants), and other goods and services providers;
- Authorities, e.g., regulators, enforcement or exchange body or courts or party to proceedings where we are required to disclose information by applicable law or regulation or at their request, or to safeguard our legitimate interests;

- Other credit, financial services, comparable institutions or other recipients to whom we transfer Personal Data in order to conduct business. In particular: (i) when providing products and services to you, to 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 the following types of companies: a party acquiring interest in, or assuming risk in or in connection with, the transaction (such as an insurer); or (ii) 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; (iii) payment recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks (including custodian banks); (iv) clearing houses, and clearing or settlement systems and specialised payment companies or institutions such as SWIFT; (v) other banks, market/transaction counterparties (including broker to whom we have executed a give-up agreement with), upstream withholding agents, swap or trade repositories, stock exchanges; (vi) any third-party fund fiduciary administrator or asset manager who provides services to you; (vii) other financial institutions, credit reference agencies or credit bureaus (for the purpose of obtaining or providing credit references); and (viii) any introducing broker to whom we provide introductions or referrals;
- Any legitimate recipient required by applicable laws or regulations.

Where UBS or the UBS Group transfer your data to third party 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).

5.3 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 appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission to the extent recognized by the competent Data Protection Authority or another statutory exemption) provided by local applicable law. As detailed in sections 4 and 5.2 above, UBS and the UBS Group ensure that their third-party service providers take steps to implement, technical and organisational measures to safeguard your Personal Data against unauthorized processing.

A list of the countries in which UBS and the UBS Group operate can be found at <https://www.ubs.com/global/en/our-firm/locations.html>.

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 operational purposes 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 access and to obtain information regarding your Personal Data that we process. 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 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).

UBS will honour such requests, withdrawal or objection 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 send an e-mail to:

- sh-complaints-hksg@ubs.com, if you are a Wealth Management client of UBS AG Singapore Branch;
- sh-ibdiso@ubs.com, if you are an Investment Banking client of UBS Principal Capital Asia Ltd, UBS AG Singapore Branch or UBS Securities Pte Ltd.

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-apac@ubs.com.

If you are not satisfied with UBS's response, you have the right to make a complaint to the Data Protection Authority. The contact details of the Data Protection Authority can be found at the following website: <https://www.pdpc.gov.sg>.

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 July 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
UBS AG Singapore Branch	9 Penang Road, 238459, Singapore, 238459, Singapore
UBS Asset Management (Singapore) Ltd	One Raffles Quay, #50-01 North Tower, Singapore, 048583, Singapore
UBS Global Trust Corporation Singapore Branch	9 Penang Road, 238459, Singapore, 238459, Singapore
UBS Principal Capital Asia Ltd.	9 Penang Road, 238459, Singapore, 238459, Singapore
UBS Securities Pte Ltd.	9 Penang Road, 238459, Singapore, 238459, Singapore
UBS Trustees (Singapore) Ltd	9 Penang Road, 238459, Singapore, 238459, Singapore

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