

DATA PRIVACY NOTICE – DUBAI INTERNATIONAL FINANCIAL CENTRE (DIFC)

NOTIFICATION TO UBS CLIENTS

Data protection under the DIFC Data Protection Law 2020

UBS takes your privacy seriously. This privacy notice contains information on what Personal Data UBS (“**UBS**”, “**we**”, “**our**”, or “**us**”) and other UBS Group companies collects, what they do with that information, and what rights you have. To run our business, UBS collects information about living individuals (also known as “**Personal Data**”).

As part of our commitment to protect your Personal Data in a transparent manner, we want to inform you:

- why and how UBS collect, treats and stores your Personal Data;
- the lawful basis on which your Personal Data is processed; and
- what your rights and our obligations are in relation to such processing.

1. What does this Privacy Notice cover?

This notice applies to any and all forms of use of Personal Data (“**processing**”) by us in the DIFC.

2. What types of Personal Data do we collect?

Depending on the product or service we provide to you (if any), we collect Personal Data about you including:

- 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 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

- In some cases, and to the extent permitted by applicable law, special categories of data, such as Personal Data revealing or concerning racial and ethnic origin, communal origin, political affiliation or opinions, religious or philosophical beliefs, data about sexual orientation, or health data and data about alleged or proven criminal offences

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.

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 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 account holder, your 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. On which legal basis and for which purposes do we process Personal Data?

3.1 Legal basis for processing

Depending on the purpose of the processing activity (see Section 3.2), 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 take pre-contractual steps at your request, such as when we use your data for some of the purposes in Sections 3.2 (a), (b), (c) below;
- necessary to meet our legal or regulatory obligations, such as tax reporting or reference requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as providing disability access to places of work where applicable;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is strictly necessary for the intended purpose (see below); or
- in some cases, and as may be requested from you from time to time, we have obtained prior consent (for instance where required by law), or processed with your explicit consent in the case of special category of Personal Data such as your medical information.

Examples of the 'legitimate interests' referred to above are:

- pursuing certain of the purposes in Sections 3.2. (a) to (k) below;
- when we make the disclosures referred to in Section 4 below, providing products and services and assuring a consistently high service standard across the UBS Group, and keeping our customers, employees and other stakeholders satisfied; or
- meeting our accountability and regulatory requirements around the world,

in each case provided such interests are not overridden by your privacy interests.

To the extent UBS has obtained your consent to process Personal Data in the past in any product-specific terms and conditions for the purposes of data protection law only, UBS will, unless explicitly stated otherwise in this notice, no longer rely on such consent, but instead will rely on lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this notice), and UBS' ability to rely on that

consent is hereby waived or extinguished. For the avoidance of doubt, any consent given for any other reason remains unaffected by this paragraph.

To the extent that we process any special categories of data relating to you, we will do so because:

- the processing is necessary to meet our legal or regulatory responsibilities;
- the processing is necessary for our regular exercise of rights, including in judicial, administrative or arbitration proceedings;
- the processing is necessary to protect the vital interests of the relevant individual or of another natural person
- the processing is necessary for reasons of substantial public interest;
- processing relates to Personal Data that has been made public by you; or
- you have given your explicit consent to us to process that information (where legally permissible).

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).

3.2 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 for the following purposes:

- a) client on-boarding processes, including to verify your identity, 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, including any engaged portfolio management 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, selecting and implementing investments on your behalf in accordance with the terms of the power of attorney you grant us;
- 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 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 of our existing products and services or learn about other products and services we can provide;
- f) subject to any applicable regulatory restrictions, 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, judicial and governmental bodies or in proceedings, and investigating or preventing crime;
- h) ensuring the safety of our clients, employees and other stakeholders;
- i) undertaking transactional and statistical analysis, and related research;

- 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.

4. How do we protect your Personal Data?

All UBS staff accessing Personal Data must comply with the internal rules and processes in relation to the processing of Personal Data to protect them and to ensure their confidentiality.

We have 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. 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.

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

5.1 With the UBS Group

We may share Personal Data with other UBS Group companies for the purposes indicated in section 3 to ensure a consistently high service standard across our group and to provide services and products to you.

5.2 Outside the UBS Group

For the purposes listed in section 3 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) 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; or
- b) Third party service providers, who are contractually bound to confidentiality, such as IT system or hosting providers, payroll providers, third parties that provide benefits or help us provide benefits to our staff (such as third parties who administer the Compensation Plans on our behalf), transport companies for work travel, cloud service providers, database providers, consultants (e.g. lawyers, tax accountants labour consultants or recruitment agencies), training, education and development providers and third parties who carry out pre-employment checks on employees, and other goods and services providers (such as food service providers); or
- c) 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; or
- d) Third parties that submit complaints, requests or reports to compliance or other units within UBS or the UBS Group; or
- e) 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 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.

- f) Any legitimate recipient required by applicable laws or regulations.

Where we 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 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 or another statutory exemption provided by local applicable law).

A list of the countries in which UBS operates can be found at <https://www.ubs.com/locations>.

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, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests.

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 us to rectify inaccurate Personal Data.

You also have the right to:

- 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/or
- 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).

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 review related decisions where such a decision is exclusively based on such processing.

We will honour such requests, 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.



7.2 Exercising your rights

For clients of UBS Switzerland AG please send your request to:

- Quality Feedback / Direktion, [UBS Switzerland AG](#), Postfach, 8098 Zürich, Switzerland or dpo-ch@ubs.com

For clients of UBS AG Singapore Branch please send your request to:

- Complaints Handling Unit, [UBS AG Singapore Branch](#), One Raffles Quay, #50-01 North Tower, Singapore, 048583, or sec-sh-complaints-hksg@ubs.com

If you are not satisfied with how UBS processes your Personal Data, please let us know and we will investigate your concern. Please raise any concerns by contacting the Group Data Protection Office at: dpo-mena@ubs.com.

8. Changes to 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. Changes to this Privacy Notice

This Privacy Notice was published in October 2020. It is a notice explaining what UBS does, rather than a document that binds UBS or any other party contractually. It may be subject to amendments. We may update, revise and change the contents of this notice. Please visit the 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 take steps to inform you of the update by appropriate means, depending on how we normally communicate with you.

10. UBS Entities in the DIFC covered by this Privacy Notice

The provisions herein apply to you if you have a contractual relationship with the following UBS entity in the DIFC

Entity Name	Registered Address
UBS AG Dubai Branch	Gate District Building 6 (Legatum Plaza), DIFC, P O Box 506542, Dubai, United Arab Emirates

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