



# UBS Website, Social Media and Cookie Notice

UBS takes your privacy seriously. This UBS Website, Social Media and Cookie Notice ("**Notice**") applies to users ("**you**") of this and other integrated UBS websites ("**UBS Websites**") and visitors of UBS' profiles in Social Media platforms and personal profiles of UBS staff acting on UBS' behalf. The Notice contains information that UBS Group AG and its entities ("**UBS**", "**we**", "**our**", or "**us**") collect(s) through these webpages and Social Media platforms and what we do with that information.

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 ("**processes**") your Personal Data; and
- how we protect your Personal Data.

## 1 What does this Notice cover?

This Notice applies to any "information" obtained by UBS through your use of UBS Websites and tracking technologies we use. It is not applicable to non-integrated UBS websites or any "internet" websites controlled by third parties not affiliated with UBS that the UBS Websites may link to ("**Third Party Sites**"). Please review the privacy statements of Third Party Sites as UBS is not responsible for and has no influence on the content or the privacy practices of Third Party Sites. It also applies to any information collected and processed in Social Media platforms (such as Facebook, LinkedIn and Twitter).

The terms of this Notice are subject to any additional terms of disclaimers or other contractual terms you have entered into with UBS such as client privacy statements or notices, and any applicable laws and regulations.

## 2 What type of information do we collect?

We collect the following Information through UBS Websites:

- a) Information that you provide to us, for example:
  - Personal details, (e.g., name, gender, address, e-mail address, phone/fax number) on a registration page or if you sign up for an email newsletter;
  - User login and subscription data, e.g., login credentials for UBS Websites;
  - Other information that you give us by filling in forms, surveys, or by communicating with us, whether face-to-face, by phone, e-mail, online or otherwise.
- b) Information that we collect or generate about you, for example:
  - Data our server automatically records when you visit UBS Websites e.g., your IP address, the website from which you visit us, the type of browser software used, the UBS Website pages that you actually visit including the date and the duration of your authentication information;
  - Cookies, pixels, unique identifiers and other similar technologies to collect and process information from different channels and devices, including devices that you use to interact with us, to recognize you, remember your preferences, tailor the content we provide to you. For details on how we use cookies, please refer to the section below;
  - Investigations data, e.g., due diligence checks, anti-money laundering checks, content and metadata related to relevant exchanges of information between individuals, organizations;
  - Records of correspondence and other communication between us, e.g., live chats, instant messages and social media communications;
  - Information that we need to support our regulatory obligations, e.g., information about transaction details, purpose of payment, counterparty/beneficiary information, detection of suspicious activities.



- c) Information that we collect from other sources, for example:
  - Information from third parties or delegated third party service providers, e.g., website user information collected through third party application service providers that we have a relationship with, or through cookies, pixels, social plugins, tags and other similar technologies.
- d) Information collected through Social Media Platforms:
  - Personal Details and Identification as included by you in your social media account, such as: first name, last name, account ID, title, profile photo, geographical area;
  - Professional Profile to the extent included by you in your social media account, such as: profession, occupation, company you work for and job function, professional qualifications, professional title, education; and
  - Information included in the comments you post in the social media platform (“Social Media Post”) and in your interaction with our profiles, such as: date and time of your interaction with us and the text of your comments on our posts or under our profiles.

### 3 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 purposes of:

- a) **Website Administration.** For example, to:
  - ensure technical administration, research & development for improving our websites and user administration.
- b) **Relationship Management.** For example, to:
  - assist you in registration to our events or logins;
  - allow you to provide feedback;
  - keep track of your specified preferences such as language, time zone and timeouts after periods of inactivity;
  - respond to any service issues; and
  - manage the social media community.
- c) **Product implementation and execution.** For example, to:
  - enhance the quality of our products and services and our use of technology.
- d) **Engaging in Prospecting and Business Development and / or Protecting and Enhancing the UBS brand.** For example, to:
  - contact you in relation to products and services;
  - assist with our promotional and marketing efforts; and
  - help us to develop targeted advertising initiatives (including behavioural advertising) where permitted, for instance ads we consider relevant for (groups of) users on external partner websites and media.
- e) **Compliance and Risk Management and / or Crime Prevention, Detection and Investigation.** For example, to:
  - Perform due diligence or anti-money laundering checks on content and metadata; and
  - comply with regulatory requirements, including the Supervision and ‘books and records’ archiving requirements imposed on broker dealers in the United States for social media interactions.



- f) **Recruitment Marketing and Application handling.** For example, to:
- Check performance of candidate sourcing channels and to track candidate source;
  - Measure the success of our social media campaigns on channels listed below;
  - Retarget specific audiences on social channels with relevant content or build look-a-like audiences;
  - Assist with our promotional and marketing efforts; and to help us to develop targeted advertising initiatives (including behavioural advertising) where permitted, for instance to create ads we consider relevant for (groups of) users on external partner websites and media.

#### 4 How do we collect and store information from you?

UBS uses tracking technology such as cookies, pixels, unique identifiers or tags (“**Tracking Technologies**”) to gather information as outlined above (see section 2) to understand how visitors use the UBS Website.

Tracking Technology helps us to manage and improve the usability of UBS Websites, for example by detecting whether there has been any contact between your device and us in the past and to identify the most popular sections of the UBS Website. We may also use these Tracking Technologies to check your instructions to us, assess, analyse and improve our service, train our staff. Please also refer to section 3 above.

The “Cookies” link at the bottom of the page gives you more details about UBS’s use of cookies, and lets you control which types of cookies UBS Websites may set on your device (known as your “**Privacy Settings**”).

When you save your privacy settings, they should also apply to your future visits to UBS Websites. However, for technical reasons beyond UBS’s control, this cannot be guaranteed. For example, if you reset your browser, delete your cookies or access UBS Websites from another browser or device your privacy settings may be lost. To comply with applicable laws and regulations, in some countries you may be asked to confirm your privacy settings when you first visit a UBS Website. In addition, you might be periodically required to re-confirm your settings.

In many cases you can also control Tracking Technologies using your browser. Please ensure that your browser setting reflects whether you wish to be warned about and/or accept Tracking Technologies where possible. The specific capabilities of your browser and instructions on how to use them can usually be found in the manual or help file of your browser. Refusing, disabling or deactivating of Tracking Technologies may result in a reduced availability of the services.

Please find below the list of Tracking Technologies applied by UBS:

Purpose	Description	Provider	Product/Service	3 <sup>rd</sup> Party Privacy Notice	Lifespan
Functional	Functional cookies are strictly necessary for <a href="http://www.ubs.com">www.ubs.com</a> to work properly. We use them to remember your entries in a form or to provide you access to closed user groups using your UBS My Site profile. Functional cookies cannot be deactivated.	UBS	UBS Internal solution	1st party	1 Session – up to 1 year depending on the cookie
Statistics	These tracking applications are used to track behavioural information on websites and mobile applications. This anonymous information is being used to allow us to ensure that all parts of our websites and mobile applications are working properly. These technologies provide aggregated, anonymous information about the behaviour and interactions.	Adobe Systems	Adobe Analytics	3rd party: <a href="#">Privacy</a>	1 session – up to 1 years depending on the cookie
		UBS	UBS Internal solution	1st party	1 session – 150 days
		TapAd	TapAd	3rd party: <a href="#">Privacy</a>	60 days
		Medallia	Medallia Digital Experience Analytics	3rd party: <a href="#">Privacy</a>	30 min – 1 year depending on the cookie
		SAS Tracking	UBS Internal solution	1st party	1 session – 150 days

User Preferences	We use cookies to show you the right language and country homepage every time you visit our websites.	UBS	UBS Internal solution	1st party	Session
Marketing	These technologies are used to increase ad relevance, improve campaign effectiveness, audience segmentation and look-a-like audience building. These technologies also allow us to individualize the user experience according to interests and needs such as screen layouts, advertisement, settings and personalized content based on interests.	Adobe Systems	Adobe Target	3rd party: <a href="#">Privacy</a>	1 years
		Adobe Systems	Adobe Audience Manager (demdex)	3rd party: <a href="#">Privacy</a>	180 days
		Google	Google Conversion Tracking	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
			Google Ads Remarketing	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
		Facebook	Facebook Conversions	3rd party: <a href="#">Privacy</a>	1 session – 22 months depending on the cookie
		LinkedIn	LinkedIn Insights	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
		Twitter	Twitter Analytics Conversion	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
		AdForm	AdForm	3rd party: <a href="#">Privacy</a>	0-60 days depending on the cookie
		Yahoo	Remarketing Japan	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
		Snapchat	Snapchat Remarketing	3rd party: <a href="#">Privacy</a>	1 session – 2 years depending on the cookie
		Tiktok	Tiktok Remarketing	3rd party: <a href="#">Privacy</a>	1 – 2 years depending on the cookie
		Pinterest	Pinterest	3rd party: <a href="#">Privacy</a>	12 months
		Fusedeck	Fusedeck	1st party: <a href="#">Privacy</a>	1 session + 30min – 1 year



In addition to above, UBS applies cookieless (server-side) session tracking technologies with anonymized IP addresses and hashing / salting of all session IDs (solution provided by Third Party provider "Capture Media AG"). No personal data is being processed as part of this solution.

UBS collects and reviews your Social Media Posts, comments and replies and classifies these to provide a response. We use analytics including machine learning to this end. We retain Social Media posts, comments and replies for 6 years to fulfil our compliance and regulatory requirements.

## **5 How do we protect Personal Data?**

UBS has implemented adequate technical and organisational security measures to protect your Personal Data collected by UBS via UBS Websites against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

All employees accessing Personal Data must comply with the internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality. Specifically, we restrict access to personal information about you to employees but also to agents or other parties who need to know the information to provide services to you.

## **6 To whom do we disclose your information collected from UBS Websites?**

UBS may disclose your information to its affiliates and their agents and third-party service providers inside or outside your country of residence to perform services for UBS and for the purposes stated above. Our affiliates, agents and third-party service providers who have access to Personal Data obtained through UBS Websites are obliged to respect your privacy, comply with legal obligations and adhere to contractual safeguards. When transferring Personal Data internationally we make sure that we comply with applicable laws and regulations, for example, by entering into agreements which will ensure that the recipients of your information maintain an adequate level of data protection. UBS does not transfer your personal data to other third parties.

We may also disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request, and for the purposes of any guidelines issued by regulatory or other authorities, or similar processes as required by applicable law.

## **7 What should you consider when sending data over open networks?**

Please note that if you transfer your information to us through an open network such as the internet, such networks are generally not regarded as a secure environment. Information sent via e.g., the internet (such as to or from the UBS Website or via electronic message) may be accessed by unauthorized third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than the one in your country of residence.

Please note that we accept no responsibility or liability for the security of your information whilst in transit over the internet to UBS. In order to protect your privacy we would like to kindly remind you that you may choose other means of communication with UBS, where you deem it appropriate.

## **8 How do we deal with information from individuals under the age of 18?**

UBS Websites do not seek to collect Personal Data from individuals under the age of 18.

Children should obtain parental or legal guardian consent as per the age threshold established by each country (which, for example in the EU, can be between 13 and 16 years depending on the Members State).



## **9 Who can you contact in relation to this Notice?**

If you are not satisfied with any aspect of the processing of your Personal Data by UBS, please let us know and we will investigate your concern by contacting the Data Protection Office at [dpo-ch@ubs.com](mailto:dpo-ch@ubs.com) or

Dr. Gabriele Holstein

Group Data Protection Officer

UBS AG  
P.O. Box  
8098 Zürich  
Switzerland

## **10 Changes to this Notice**

This Notice was last updated in December 2023. Any amendment or update to this Notice we will make available to you via [www.ubs.com/privacy](http://www.ubs.com/privacy).