UBS

CANDIDATE PRIVACY NOTICE – U.S.

To run our business, UBS collects and uses information about living individuals ("**Personal Information**"), including information about our current, former and prospective candidates for employment with UBS ("**you**").

UBS takes your privacy seriously. This Candidate Privacy Notice ("**Notice**") contains information on what Personal Information the UBS employing entity/ies ("**UBS**", "**we**", "**our**", or "**us**", see relevant UBS entities in section 9) and other companies of the group to which we belong (the "**UBS Group**") collect(s), what they do with that information, and what rights you have.

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

- why and how UBS collects, uses and stores your Personal Information; and
- the lawful basis for the use of your Personal Information.

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1 What does this Notice cover?

This Notice applies to any and all forms of use of Personal Information ("**processing**") by in the United States if you are a current, former or prospective candidate of any of the UBS employing entities listed in section 9.

2 What type of Personal Information do we collect?

For prospective, current, and former candidates, we collect basic identification information, such as your name, title, position, professional history, experience and contact details.

If you actively apply for a role with UBS, we will usually also collect:

- Personal details and identification information (e.g., date of birth, nationality, picture, gender, ID card, passport numbers and other national ID numbers as required, immigration status);
- Physical and electronic address details (e.g., private telephone number, private email and/or postal address and business telephone number);
- Education and employment information (e.g., remuneration at your current employer, employment dates with your current employer, interview performance evaluation and scores in any online testing, position information such as position title, and language skills);
- Information submitted as part of your application (e.g., recordings of any video interviews in which you participate, and anything you choose to submit by choice in support of your application);

- Electronic and physical communication information, including but not limited to in- and outbound emails including attachments, phone conversations, chat or other instant messaging, faxes (digital) and other communication data (e.g., phone meta data); and
- Where relevant, behavioral information and information about personality traits such as data collected to assess a candidate's suitability.

Information you submit as part of your application must be true, accurate, complete, and not misleading. Any false or misleading statements or omissions made by you during the application process, including your application and any assessments and interviews, may be sufficient cause to justify the rejection of your application or, if you have already become an employee, the immediate termination of your employment, subject to due process.

If you provide information about your family or any other third party to us as part of your application (e.g., emergency contacts or referees) then, before providing us with such information, you must inform the relevant individuals that you will disclose their Personal Information to us and provide a copy of the information in this Notice to them.

If you accept a role with UBS, then in order to conduct any necessary background checks and create your record in the UBS Group employee database, we will usually also collect:

- Family information (e.g., marital status, and details of any family or personal relationships within UBS); and
- Financial information (e.g., summary credit history, bank account details, tax-related information, and information required to undertake required checks for money laundering, criminal activities, corruption, terrorist financing and related matters).

In some cases, the Personal Information that we process will also include sensitive personal information, such as diversity-related information (including data about racial and ethnic origin, religious beliefs and other beliefs of a similar nature) and data about alleged or proven criminal offences, in each case where permitted by law.

For candidates subject to CCPA/CPRA, sensitive personal information refers to Personal information that reveals your consumer's social security, driver's license, state identification card, or passport number. account log-in, financial account, password, or credentials allowing access to an account, or racial or ethnic origin. Where required we collect and treat these data as required by the law.

In some cases, the Personal Information we collect from you is needed to meet our legal or regulatory obligations. If so, we will indicate to you that the provision of this information is mandatory, and the consequences if we cannot collect this information.

We may use cookies, tracking technologies and other means (e.g., web beacons, pixels, gifs, tags, unique identifiers) to collect and process the above information from different channels and devices you use, including email, and devices that you use to interact with us to access UBS websites, UBS platforms, products, services and applications for mobile devices.

For our usage of cookies and other tracking technologies in relation to UBS websites please also refer to the UBS Website, Social Media and Cookie Notice available here.

The above-mentioned Personal Information are collected from information that you directly provide (through the completion and submission of online application forms and profiles, through resumes or curriculum vitae, or through interviews or other communications). In some cases, UBS will also collect Personal Information indirectly from third parties, such as recruitment agencies that you used to apply to UBS, background check providers such as CISIVE or HireRight and other administration services providers (for instance who provide candidate shortlisting services), or from publicly available sources such as business- and employment-orientated social networking services and job boards.

3 For which purposes do we process Personal Information and what legal basis do we rely on?

3.1 Purposes of processing

We always process your Personal Information for a specific purpose and only process the Personal Information

which is relevant to achieve that purpose. In particular, we process Personal Information of candidates, within applicable legal limitations, for the purposes of:

a) Recruiting and Employee onboarding:

- to undertake recruitment activities, such as determining the suitability of a candidate's qualifications, maintaining information on the status of your application;
- to assist us in managing external providers (e.g., recruitment agencies – see below for further information about when we work with third parties);
- to prepare for and enter into a contractual employment relationship.

b) Staff Administration:

- to manage our HR records and update the UBS Group employee database (e.g., keeping your application data on file);
- to communication with you about any actual or potential job vacancy.

c) Onboarding:

- to set up internal profiles, collecting information required to complete the employee onboarding process. For background checks see d) below);
- to assist us in managing external providers involved in the onboarding process (e.g., insurance companies, pension funds).

d) Compliance & Risk Management and / or Crime Prevention:

- to carry out background checks as part of the employee onboarding process, including checking for any existing or potential conflicts of interest or any other restrictions which may otherwise restrict or prevent a candidate's employment with UBS as well as to prevent crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to receive and handle complaints, requests or reports made to a compliance function, HR function, or other designated units within UBS or the UBS Group;
- to reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority (e.g., if UBS is under a duty to disclose Personal Information to comply with any legal or regulatory obligation);
- to comply with any legal or regulatory obligations imposed on UBS in relation to its recruitment practices such as governmental reporting requirements.

e) Other purposes:

- to provide information to other UBS Group entities or third parties to benefit from cost-effective services, efficient solutions and subject-matter expertise (e.g., we may opt to use certain IT platforms offered by suppliers. We may also share Personal Information with another UBS entity so that a team with the appropriate subject-matter expertise can provide advice or support);
- to provide information to third parties 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, prevent unauthorized physical access to secure premises (e.g., maintaining building access logs and CCTV system images);
- to create custom and lookalike audiences on various social media platforms allowing to display targeted job advertisements.

We use both automated (including artificial intelligence) and manual methods to process your Personal Information for these purposes. Our automated methods often are related to and supported by our manual methods. For example, our artificial intelligence systems (e.g. Microsoft 365 Copilot) may analyse your data to identify patterns and trends, which are usually manually reviewed and interpreted by humans. Please see section 10.1. for further information on automated decision making.

3.2 Basis for the processing of Personal Information

Depending on the purpose of the processing activity (see section 3.1), the business and commercial purposes for the processing of your Personal Information 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 preparing a contract of employment for you following a decision to make you an offer of employment;
- necessary to comply with our legal or regulatory obligations, such as reference requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as providing disability access to UBS premises for interviews where applicable;
- necessary for the business and commercial purposes of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Information is necessary for the intended purpose (see below);
- necessary for the performance of a task carried out in the public interest; or
- in some cases, we have obtained prior consent (such as when we apply automated decision making to evaluate whether to reject or proceed with your application) processed with your explicit consent in the case of sensitive personal information.

Examples of the "business and commercial purposes" referred to above are:

- to benefit from cost-effective services (e.g., we may opt to use certain IT platforms offered by suppliers. We may also share Personal Information with another UBS entity so that a team with the appropriate subject-matter expertise can provide advice or support);
- to determine whether a candidate or potential candidate's skills, qualities and experience are suitable for a role within UBS, and determine whether or not to either (i) make an offer of employment with UBS; or (ii) approach a candidate with a view to making an offer of employment with UBS, on this basis;
- at the appropriate stage in the recruitment process (i.e., as part of making an offer of employment to you), to verify the accuracy of information you have provided to us as part of your application, including through background screening;
- to 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;
- to create custom and lookalike audiences on various social media platforms allowing to display targeted job advertisements.

To the extent that we process any sensitive personal information relating to you, we will do so because:

- the processing is necessary to carry out our obligations under employment, social security or social protection law;
- the processing is necessary for the establishment, exercise or defence of a legal claim;
- the processing is necessary for reasons of substantial public interest; or
- you have given your explicit consent to us to process that information (where legally permissible).

You are under no obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

4 How do we protect Personal Information?

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

UBS and the UBS Group have also implemented adequate technical and organisational measures to protect Personal Information 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 Information and with whom are they shared?

5.1 Within UBS and the UBS Group

We make available Personal Information to members of our personnel and within the UBS Group for the purposes indicated in section 3.1. Other companies of the UBS Group may process your Personal Information on behalf and upon request of UBS.

5.2 Outside UBS and the UBS Group

For the purposes listed in section 3.1 above, and to the extent permitted under applicable law, we may also transfer Personal Information to third parties outside UBS and the UBS Group, such as:

- third party service providers, who are contractually bound to confidentiality, such as our IT system or hosting providers, cloud service providers, social network platforms, database providers, consultants (including the recruitment agency whom you used to apply to UBS, if applicable, and lawyers) and third parties who carry out pre-employment checks on prospective employees (such as HireRight);
- 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;
- 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;
- the referees provided on your application form to UBS;
- any central or local government department and other statutory or public bodies; and
- any legitimate recipient of communications required by 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 Information 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 Information 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 Information 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.

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 Information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements, whichever is longer. In general, although there may be exceptions, data relating to unsuccessful candidates for roles within UBS is kept for 48 months after the date on which we notify you that your most recent application has been unsuccessful; data relating to potential candidates for roles within UBS is kept for 48 months from the date of our last recorded communication with you. Any maximum storage term set forth by applicable law will prevail. Personal Information relating to successful candidates is dealt with by the employee privacy notice that will be provided to you upon joining UBS. If your application is successful, your application will be retained as part of your personnel record.

However, if you wish to have your Personal Information removed from our databases, you can make a request as described in section 10 below, which we will review as set out therein.

7 Changes to your Personal Information

We are committed to keeping your Personal Information accurate and up to date. Therefore, if your Personal Information changes, please inform us of the change as soon as possible.

8 Updates to this Notice

This Notice was updated in July 2026. 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.

9 List of UBS employing entities covered by this Notice

Entity Name	Registered Address
UBS Asset Management (Americas) Inc.	Corporation Service Company, 251 Little Falls Drive, Wilmington, 19808, USA
UBS AG Stamford Branch	Corporation Service Company, 50 Weston Street, Hartford, 06120, United States of America
UBS Securities LLC	Corporation Service Company, 251 Little Falls Drive, Wilmington, 19808, USA
UBS AG New York Branch	11 Madison Avenue, New York, NY 10010-3629, United States of America
UBS Realty Investors LLC	c/o Corporation Service Company, 84 State Street, Boston, 02109, USA
UBS Farmland Investors LLC	c/o Corporation Service Company, 84 State Street, Boston, MA 02109, USA
UBS Financial Services Inc.	Corporation Service Company, 251 Little Falls Drive, Wilmington, 19808, USA
UBS Bank USA	95 State Street, Suite 2200, Salt Lake City, Utah, 84111, United States of America
UBS Americas Inc.	Corporation Service Company, 251 Little Falls Drive, Wilmington, 19808, USA
UBS Business Solutions US LLC	Corporation Service Company, 251 Little Falls Drive, Wilmington, 19808, USA
UBS Trust Company of Puerto Rico	American International Plaza,10th floor, 250 Munoz Rivera Avenue, Hate Rey, 00918, Puerto Rico

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

10 Appendix I – Other provisions specific for candidates domiciled in California

This section includes specific provisions applicable only to a candidate that is domiciled in California ("you"), in addition to the information provided in the remaining sections of this Notice.

10.1 Your rights

You have the right to request UBS to disclose the categories and specific pieces of Personal Information we have collected and process about you. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Information. You also have the right to access and to obtain a copy of your Personal Information as processed by UBS and to request the erasure of your Personal Information. UBS does not sell your Personal Information, or share your Personal Information other than to service providers that support the recruitment process.

UBS will honor such requests as required under applicable data protection rules, but these rights are not absolute: they do not always apply, and exemptions may be engaged pursuant to your current relationship with UBS and/or to applicable legal obligations. 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 Information using automated decision making technology. To the extent required by any regulations issued by the relevant California authority, UBS shall inform its candidates of such automated decision making that uses Personal Information and may provide information on criteria and procedures applied. If permitted by law, where we do not rely on your prior consent, you can request an explanation about the automated decision making carried out using your Personal Information and can request that a natural person reviews the related decision where such a decision is exclusively based on such processing.

10.2 Exercising your rights

To exercise the above rights, please send an email to sh-hr-data-requests-snow@ubs.com or call us at: 1-855-827-6947.

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