

# CANDIDATE PRIVACY NOTICE

To run our business, UBS collects and uses information about living individuals (“**Personal Data**”), 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 Data the UBS employing entity/ies (“**UBS**”, “**we**”, “**our**”, or “**us**”, see relevant UBS entities in section 10) 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 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 all forms of use of your Personal Data (“**processing**”) by us in the European Economic Area (“**EEA**”), Guernsey, Jersey and the UK if you are a current, former or prospective candidate of any of the UBS employing entities listed in section 10.

## 2 What type of Personal Data 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, behavioural 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 Data 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 Data that we process will also include special categories of data (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 convictions and offences, in each case where permitted by applicable law.

In some cases, the Personal Data 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.

The above-mentioned Personal Data 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 Data indirectly from third parties, such as recruitment agencies that you used to apply to UBS, background check providers such as HireRight or Sterling 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 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 of candidates, within applicable legal limitations, for the purposes of:

- a) Recruiting and application handling:
  - 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 such as offer approvals.

- b) Staff Administration:
- to manage our HR records and update the UBS Group employee database (e.g., keeping your application data on file);
  - to communicate 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 data 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 Data 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 exercise our duties and/or rights vis-à-vis you or third parties (e.g., if UBS needs to obtain legal advice or provide Personal Data in connection with judicial proceedings);
  - to collect data to ensure the security of buildings, as well as property and information located or stored on the premises and to 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.

### **3.2 Basis for the 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 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 (for example when we use your data for some of the purposes in section 3.1 a) and c) above);

- necessary to comply with our legal or regulatory obligations, such as reference requirements (for example when we use your data for some of the purposes in section 3.1 b), c), d) and e));
- 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 legitimate interests of UBS, and does not unduly affect your interests or fundamental rights and freedoms (for example when we use your data for some of the purposes in section 3.1 a), b), d) and e). See below for more examples of legitimate interests of UBS);
- 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 for some of the purposes in section 3.1 a) above), or processed with your explicit consent in the case of special category of Personal Data (such as your health data).

Examples of the “legitimate interests” referred to above are:

- 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 Data with another UBS entity so that a team with the appropriate subject-matter expertise can provide advice or support) - (see section 3.1 e) above);
- 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; (see section 3.1 a) above);
- 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 (see section 3.1 d) above);
- 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 (see section 3.1 d) and e) above);
- to create custom and lookalike audiences on various social media platforms allowing to display targeted job advertisements (see section 3.1 e) above);
- to exercise our rights under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property (where applicable).

To the extent that we process any special categories of data 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 Data?**

All UBS 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.

UBS and the UBS Group have also implemented adequate technical and organisational measures to protect 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 make available Personal Data 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 Data 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 Data to third parties outside UBS and the UBS Group, such as:

- a) third party service providers, who are contractually bound to confidentiality, such as our IT system or hosting providers, cloud service providers, social media 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);
- b) 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;
- 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;
- d) the referees provided on your application form to UBS;
- e) any central or local government department and other statutory or public bodies; and
- f) 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 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. 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(s) 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 36 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 36 months from the date of our last recorded communication with you. Any maximum storage term set forth by applicable local law will prevail. Personal Data 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 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 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:

- 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).

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 better understand your request. 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 email to [sh-hr-data-requests-snow@ubs.com](mailto:sh-hr-data-requests-snow@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 UBS Group Data Protection Office at: [dpo-pl@ubs.com](mailto:dpo-pl@ubs.com).

If you are not satisfied with UBS's response, you have the right to make a complaint to the Data Protection Authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

**For EEA countries**, information can be found at the following website: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

**For UK**, Commissioner's Office ("ICO"). You can contact the ICO at the following address:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire  
SK9 5AF  
Telephone: +44 (0) 303 123 1113. Other contact details: <https://ico.org.uk/global/contact-us/>

**For Jersey**, Office of the Information Commissioner. You can contact the Information Commissioner at the following address:

Office of the Information Commissioner  
5 Castle Street  
St. Helier, Jersey, JE2 3BT  
Telephone: +44 (0)1534 716530 / Email: [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)

**For Guernsey**, Office of the Data Protection Authority. You can contact the Data Protection Authority at the following address:

Office of the Data Protection Authority  
 St Martin's House,  
 Le Bordage,  
 St. Peter Port,  
 Guernsey  
 GY1 1BR  
 Telephone: +44 (0)1481 742074 / Email: [enquiries@odpa.gg](mailto:enquiries@odpa.gg)

## 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 October 2023. 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 employing entities covered by this Notice

Country	Entity Name	Registered Address
Austria	UBS Fund Management (Luxembourg) S.A., Austria Branch	Fleischmarkt 1, Wien, Austria
Denmark	UBS Europe SE, Denmark Branch	Sankt Annae Plads 13, 1250, Copenhagen
France	UBS (France) S.A.	69 Boulevard Haussmann, 75008, Paris
France	UBS Immobilier (France) S.A.	69 Boulevard Haussmann, 75008, Paris
France	UBS La Maison De Gestion	4 place Saint-Thomas d'Aquin, 75007, Paris
France	UBS Europe SE French Branch	69 Boulevard Haussmann, 75008, Paris
France	Credit Suisse (Luxembourg) S.A., France Branch	86 Boulevard Haussmann, 75008, Paris
France	Credit Suisse Bank (Europe), S.A., Paris Branch	86 Boulevard Haussmann, 75008, Paris
Germany	UBS Asset Management (Deutschland) GmbH	Bockenheimer Landstrasse 2-4, 60306, Frankfurt am Main
Germany	UBS Beteiligungs-GmbH & Co. KG	Bockenheimer Landstrasse 2-4, OpernTurm, 60306, Frankfurt am Main
Germany	UBS Europe SE	Bockenheimer Landstrasse 2-4, 60306, Frankfurt am Main
Germany	UBS Real Estate GmbH	Theatinerstraße 16, 80333 München

Country	Entity Name	Registered Address
Germany	Credit Suisse (Deutschland) Aktiengesellschaft	Taunustor 1, 60311 Frankfurt am Main
Guernsey	Credit Suisse AG, Guernsey Branch	Helvetia Court, Les Echelons – South Esplanade, St Peter Port GY1 3ZQ
Guernsey	Credit Suisse Trust Limited (Guernsey)	Helvetia Court, Les Echelons – South Esplanade, St Peter Port GY1 3ZQ
Ireland	Lantern Structured Asset Management Limited	First Floor, College Park House, South Frederick Street, Dublin 2, D02 VY46, Ireland
Ireland	UBS Partner Ireland Limited	Riverside One, Sir John Rogerson's Quay, Dublin, D02 X576, Ireland
Ireland	UBS Fund Management (Ireland) Ltd.	First Floor, College Park House, South Frederick Street, Dublin 2, D02 VY46, Ireland
Ireland	Credit Suisse (Luxembourg) S.A., Ireland Branch	Kilmore House, Park Lane, Spencer Dock, Dublin 1, D01 YE64, Ireland
Ireland	Credit Suisse AG, Dublin Branch	Kilmore House, Park Lane, Spencer Dock, Dublin 1, D01 YE64, Ireland
Ireland	Credit Suisse Fund Services (Ireland) Ltd	Kilmore House, Park Lane, Spencer Dock, Dublin 1, D01 YE64, Ireland
Ireland	SCALE Aviation Designated Activity Company	25-28 North Wall Quay, Dublin 1, D01 C4E0, Ireland
Italy	UBS Fiduciaria SpA	Via del Vecchio Politecnico n. 3, 20121 Milano
Italy	UBS Asset Management (Italia) SGR SpA	Via del Vecchio Politecnico n. 3, 20121 Milano
Italy	UBS Europe SE, Succursale Italia	Via del Vecchio Politecnico n. 3, 20121 Milano
Italy	Credit Suisse (Italy) S.p.A.	Via Santa Margherita n. 3, 20121 Milano
Italy	Credit Suisse AG, Milan Branch	Via Santa Margherita n. 3, 20121 Milano
Italy	Credit Suisse Bank (Europe), S.A., Italian Branch	Via Santa Margherita n. 3, 20121 Milano
Italy	Credit Suisse Servizi Fiduciari Srl	Via Santa Margherita n. 3, 20121 Milano
Jersey	UBS Trustees (Jersey) Ltd	1 IFC Jersey, JE2 3BX, St Helier, Jersey
Jersey	UBS AG Jersey Branch	1 IFC Jersey, JE2 3BX, St Helier, Jersey
Luxembourg	UBS Europe SE, Luxembourg Branch	33A avenue J.F. Kennedy, 1855, Luxembourg



Country	Entity Name	Registered Address
Luxembourg	UBS Fund Management (Luxembourg) S.A.	33A avenue J.F. Kennedy, 1855, Luxembourg
Luxembourg	UBS Fund Services (Luxembourg) S.A.	33A avenue J.F. Kennedy, 1855, Luxembourg
Luxembourg	Credit Suisse (Luxembourg) S.A.	5 rue Jean Monnet, 2180, Luxembourg
Luxembourg	Credit Suisse Fund Management S.A.	5 rue Jean Monnet, 2180, Luxembourg
Luxembourg	Credit Suisse Fund Services (Luxembourg) S.A.	5 rue Jean Monnet, 2180, Luxembourg
Luxembourg	MultiConcept Fund Management S.A.	5 rue Jean Monnet, 2180, Luxembourg
Netherlands	UBS Europe SE, Netherlands Branch	Amstelplein 1 1069 HA, Amsterdam Netherlands
Netherlands	UBS Fund Management (Luxembourg) S.A., Netherlands Branch	Amstelplein 1, 1069 HA, Amsterdam Netherlands
Netherlands	Credit Suisse Bank (Europe), S.A., Amsterdam Branch	Honthorststraat 19, 1071 DC Amsterdam Netherlands
Netherlands	Credit Suisse Fund Management S.A., Netherlands Branch	Honthorststraat 19, 1071 DC Amsterdam Netherlands
Poland	UBS Europe SE Poland Branch	Aleje Ujazdowskie 51 00-536 Warsaw, Poland
Poland	UBS Business Solutions Poland Sp. z o.o.	Eximius Park, ul. Krakowska 280, 32-080 Zabierzow, Poland
Poland	UBS Switzerland AG Przedstawicielstwo w Polsce	Al. Ujazdowskie 51, 00-536 Warszawa, Poland
Poland	Credit Suisse (Poland) Sp. z o.o.	Ul. Icchoka Lejba Pereca 1, 00-849 Warszawa, Poland
Portugal	Credit Suisse (Luxembourg) S. A. – Sucursal Em Portugal	Tivoli Forum, Av. da Liberdade 180-A, 8th Floor, 1250-146 Lisboa,
Spain	UBS Europe SE, sucursal en España	Calle María de Molina 4, 28006, Madrid
Spain	UBS Gestión Sociedad Gestora de Instituciones de Inversión Colectiva SA	María de Molina 4-3a, 28006, Madrid
Spain	Credit Suisse AG, Sucursal en España	Calle Ayala 42, 28001 Madrid
Spain	Credit Suisse Asesoramiento y Servicios S.A.	Calle Ayala 42, 3 Planta A, 28001 Madrid
Spain	Credit Suisse Bank (Europe), S.A.	Calle Ayala 42, 3 Planta A, 28001 Madrid
Spain	Credit Suisse Gestion S.G.I.I.C., S.A.	Calle Ayala 42, 5ª Planta A, 28001 Madrid

Country	Entity Name	Registered Address
Sweden	UBS Europe SE, Sweden Bankfilial	Regeringsgatan 38, 11187, Stockholm
Sweden	Credit Suisse Bank (Europe), S.A., Stockholm Branch Filial	Norrmalmstorg 12, 111 46 Stockholm
UK	UBS AG London Branch	5 Broadgate, EC2M 2QS, London
UK	UBS Asset Management Holding Ltd	5 Broadgate, EC2M 2QS, London
UK	UBS Business Solutions AG, UK Branch	5 Broadgate, EC2M 2QS, London
UK	UBS Asset Management (UK) Ltd	5 Broadgate, EC2M 2QS, London
UK	Aventicum Real Estate Ltd	One Cabot Square, E14 4QJ, London
UK	Credit Suisse (UK) Limited	One Cabot Square, E14 4QJ, London
UK	Credit Suisse AG, London Branch	One Cabot Square, E14 4QJ, London
UK	Credit Suisse Asset Management Limited	One Cabot Square, E14 4QJ, London
UK	Credit Suisse International	One Cabot Square, E14 4QJ, London
UK	Credit Suisse Services AG, London Branch	One Cabot Square, E14 4QJ, London

If you have any questions or comments about this Notice, please contact the Group Data Protection Office at [dpo-pl@ubs.com](mailto:dpo-pl@ubs.com).