

June 12, 2023

US Privacy Notice for General Business Contacts and Institutional Client Representatives ("B2B Privacy Notice")



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Introduction

Protecting the privacy of the people we interact with (“you”) is important to us. This B2B Privacy Notice applies to our business-to-business contacts, which includes (i) representatives/staff members of our institutional clients, including individuals connected to such representatives/staff members (collectively “Client Representatives”) and (ii) all other general business to business contacts that Credit Suisse may interact with (“General B2B Contacts”). This B2B Privacy Notice describes (i) how we¹ process your personal data or personal information (“personal data” and “personal information” as used interchangeably here have the meaning used under any applicable data privacy laws) and (ii) our privacy obligations to you. In some cases, our data processing activities may only apply to our Client Representatives or General B2B Contacts, respectively, and such distinctions will be reflected accordingly throughout this B2B Privacy Notice.

Please note that our privacy practices may be further reflected in accompanying federal or state specific privacy notices (i) previously provided to you and/or (ii) posted on our website (collectively “Accompanying Notices”) which are incorporated into this B2B Privacy Notice. Weblinks to Accompanying Notices provided online are available on our [website](#). To the extent that the terms of this B2B Privacy Notice conflict with the terms of our Accompanying Notice, the more protective terms for you shall be applied.

1. How We Obtain your Personal Data

We obtain personal information from you directly or indirectly as described in the table below.

Applies To	Method	How We Obtain Your Personal Data
Client Representatives & General B2B Contacts	Directly From You	<ul style="list-style-type: none">■ In the course of providing services to you/your organization or in the context of our business relationship with you and/or your organization (e.g., through your subscription on our Internet Homepage)
Client Representatives & General B2B Contacts	Indirectly From You	<ul style="list-style-type: none">■ Monitoring & surveillance (e.g., recording of telephone calls, monitoring e-mails and chat messages and our office surveillance footage)
Client Representatives & General B2B Contacts	Indirectly From You	<ul style="list-style-type: none">■ News (e.g., trade press or paid for content)■ Publicly available sources (e.g., public websites & social media sites)
Client Representatives & General B2B Contacts	UBS Group Affiliates & Other Third Parties who are lawfully permitted to disclose your personal data	<ul style="list-style-type: none">■ Your organization■ Other third parties (e.g., settlement service providers, central securities depositaries, exchanges, central clearing counterparties and other similar entities, databases, and third-party service providers such as professional advisers, insurers and risk consulting firms, or firms hired to conduct due diligence in connection with anti-money laundering obligations or other applicable laws or regulations)

2. Our Personal Data Processing Activities

In the course of our dealing with you, we may conduct processing activities with respect to your personal data, which are further described in [Appendix A](#) (for Client Representatives) and [Appendix B](#) (for General B2B Contacts) below respectively.

3. For How Long Will My Personal Data Be Retained?

We will process your personal data for as long as it is necessary in order to provide services to your associated/employing organization and to fulfill our contractual, legal, statutory or regulatory obligations (“retention purpose”). After client services are terminated, we keep your personal data for at least 10 years to meet applicable record retention requirements and we may hold your personal data for longer periods to comply with our legal and regulatory obligations. If your personal data is no longer needed for the retention purpose, it may be deleted, unless further processing is required under applicable law or regulation.

¹ As a result of the acquisition of Credit Suisse Group by UBS Group, all entities of Credit Suisse Group have become UBS Group entities. Accordingly, the references to “Credit Suisse Group” (and similar references, e.g. “Credit Suisse entities”, “affiliates”, etc.) also include the UBS Group entities.

4. What privacy rights do I have?

In relation to your personal data, and to the extent applicable under the applicable data privacy laws, you have different rights with respect to how we process your personal data.

Such rights may include a right to:

- access personal data we process about you in a portable format;
- correct inaccurate or incomplete personal data we hold about you;
- delete your personal data (to the extent permitted under law); &
- to the extent applicable and as enumerated in the applicable Accompanying Notices, restrict or opt out of certain data processing activities.

Depending on the privacy laws applicable to you, you may have other rights, which are further enumerated in in your Accompanying Notices. For California residents, please see our [Annual Privacy Notice](#) for more information on your rights under the California Consumer Privacy Act. We will not sell California residents' personal information or share California residents' personal information for cross-context behavioral advertising purposes.

Please contact the Americas Data Protection Office by phone by calling us at +1(800) 720-3452 or emailing us at us.data-protection@credit-suisse.com if you wish to (i) exercise any of the above rights, or (ii) if you have any questions or concerns.

You may also contact our Group Data Protection Officer at:

Group Data Protection Officer
One Cabot Square
London E14 4QJ United Kingdom
E-mail: data.protection@credit-suisse.com

Important Note: when contacting our Data Protection Office, please ensure that you indicate the legal entity from which your firm obtains or provides services and/or to the extent permitted under applicable banking secrecy or client confidentiality laws, the name of your firm.

You can also make a complaint to your competent data protection supervisory authority using the contact details reflected in Accompanying Notices.

5. Who is Responsible for Personal Data Processing and How Can I Contact them?

The applicable "data controller" / "business" data (as such terms are defined under applicable privacy laws) who is responsible for the processing of your personal data is the UBS entity (i) providing the relevant financial services connected to your associated/employing organization or (ii) communicating with or otherwise interacting with you.

6. Am I Obligated to Provide Personal Data?

Providing us with your personal data is voluntary. However, if you do not provide us with the personal data that we request from you, it may not be possible to provide services to your associated/employing organization.

7. Changes to this B2B Privacy Notice

Changes may need to be made to this B2B Privacy Notice in the future. If we do make changes, we will post updates to our website located [here](#).

Appendix A

Processing Activities of Client Connected Parties or Representatives

Types of Personal Data (including Sensitive Personal Data)

- personal details relating to you (name, date and place of birth, nationality, citizenship, gender, domicile)
- contact details, including private and / or business phone numbers, postal and email addresses
- identification data such as passports, National Insurance or Social Security numbers, driving license, ID cards, property register identification, social network usernames, customer identifiers (CIF, IBAN / BIC), relationship identifiers (e.g., client segment and account currency), photographs
- authentication data such as sample signatures
- marital status, name of spouse, number of children (if applicable)
- tax status (e.g., tax ID)
- order data (e.g., payment data and account information)
- data from the fulfillment of our contractual obligations
- information about your financial situation (e.g., source of wealth, incomes, benefits, mortgage information, shareholdings)
- video surveillance and telephone / audio recordings
- data relating to criminal convictions and offences (including excerpts of criminal register)
- data related to designation of your status as a politically exposed person (PEP) and related information
- marketing and sales data (e.g., customer relationship documentation)
- data relating to your habits and preferences
- special categories of personal data, of a more sensitive nature, such as health or medical information or data relating to children
- dietary and access requirements (e.g., for event organization purposes)
- data from your interactions with us, our branches, our internet websites (including metadata), our apps, our social media pages, meetings, calls, chats, emails, interviews and phone conversations
- documentation data (e.g., file notes or meeting minutes from a consultation, client needs and product usage)
- data relating to your current and past professional roles and employment, and education (e.g., corporate title, membership of professional associations or bodies, career histories or biographies, job function, knowledge and experience in investment matters, qualifications and skills)
- other data similar to the broad categories mentioned above.

Why We Process your Personal Data (“Purpose”)

a. Due to legal obligations

We are subject to various legal and regulatory obligations, including without limitation prudential and conduct regulation of banks and investment firms, as applicable, regulation of financial markets, compliance with any court orders, investor protection regulations, securities regulations, laws relating to money laundering, terrorism finance, sanctions and any tax laws.

The purposes of processing may include:

- identity checks, fraud and financial crime and market abuse prevention or detection. If fraud is detected, the organization that you are employed or otherwise connected to (“Organization”), or individuals connected to it or you could be refused certain services
- fulfilling control and reporting obligations under applicable financial regulations including, without limitation, securities and financial crime regulations
- fulfilling requirements related to our licenses and regulatory permissions
- complying with investor protection or conduct of business regulation (such as carrying out suitability or appropriateness assessments)
- complying with regulatory record keeping obligations
- complying with regulatory obligations in relation to measuring and managing risks within the UBS Group

b. For purposes of legitimate interests

We may process your personal data, for the purposes of the legitimate business and other interests pursued by us or a third party, in:

- developing, deploying and supporting our products and services
- developing and furthering our business and business relationships
- protecting our businesses and the integrity of the financial markets
- managing risk and securing our systems, assets, infrastructure and premises
- exercising and defending our legal rights and position anywhere in the world
- complying with legal and regulatory obligations and cooperating with regulatory, judicial and other authorities and bodies around the world
- supporting other UBS companies in pursuing the above interests.

The purposes for which we may process your personal data (and such processing may involve sharing data between members of UBS Group and/or external parties) in connection with the above interests include the following:

- carrying on business relationships with clients and other parties
- providing services to clients
- due diligence in relation to transactions members of UBS Group are involved in
- performing obligations and exercising rights under and otherwise carrying out contracts, or taking pre-contractual measures with your organization or a third party
- management of the businesses and further development of the services and products of the UBS Group
- reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions
- marketing activities or market and opinion research
- obtaining personal data from publicly available sources for client on-boarding purposes
- compliance with licensing, permission and/or licensing exemption requirements and regulatory requests or guidance related to such licenses, permissions or exemptions
- compliance with applicable laws, regulations and judicial orders outside your jurisdiction.
- compliance with regulatory guidance, policy statements, best practice and associated policy requirements and controls in connection with the carrying on business
- facilitation of and responding to, regulatory requests and supervisory visits, and otherwise acting in open and collaborative manner with competent regulatory authorities
- prevention of and investigations related to financial crime, including fraud, financing of terrorism and money laundering, and compliance with sanctions, including know your customer (KYC) and regular politically exposed persons (PEP) screening
- asserting legal claims and defenses in legal disputes
- carrying out conflict checks
- handling client complaints
- warehousing appropriate information within a single jurisdiction in order to co-ordinate the services and business activities of the UBS Group and satisfying other administrative needs across UBS Group
- facilitating operational actions in connection with our business relationships (e.g., processing of payments, billing)
- validating the authority of signatories (e.g., when concluding agreements and transactions)
- risk control
- consulting with credit rating agencies to investigate creditworthiness and credit risks where we may have an exposure to you
- securing and operating UBS Group's IT systems
- video surveillance and measures to protect the rights of an owner of premises to keep out trespassers and to provide site security (e.g., access controls).
- to perform a review for deceased accounts
- mergers, acquisitions and re-organizations including by providing information to future purchasers or transferees

c. For fulfillment of contractual obligations

We may process your personal data in order to maintain our business relationship with you in accordance with our legal agreement(s) with you. Such processing may take place in order to carry out obligations or exercise rights we may have pursuant to the legal agreement(s) with you, to take steps necessary in order to conclude a legal agreement with you or to take other steps at your or your representative's request prior to entering into a legal agreement with you. If you are our client, the level and nature of processing of your personal data that we may carry out pursuant to this paragraph will likely depend on the specific product or service to be provided to you (and can include needs assessments and other assessments to provide advice and support to you, as well as to carry out transactions contemplated in, or necessary to fulfill, such legal agreement). To the extent that transactional documents have more restrictive terms, these terms shall prevail.

d. As a result of your consent

There may be circumstances where we ask for your consent to process your personal data. In some locations the consent might be included in the client contractual documentation and covers the purposes of processing mentioned above and disclosure to entities mentioned below. As long as you have granted us this consent, this processing is legal on the basis of that consent. You can withdraw your consent at any time by contacting the Data Protection Office (see section 4 above). Withdrawal of consent does not affect the legality of data processing carried out prior to withdrawal.

e. When processing special categories of personal data, of a more sensitive nature

For reasons relating to, for example, substantial public interest, protection of vital interests, in the field of public health, for the establishment of legal claims or where we have obtained your explicit consent, we may process special categories of personal data, including sensitive data. We will only do this where we have appropriate lawful bases for processing such data, and in line with applicable data protection laws and regulations.

Who We Share Your Personal Data With

a. The UBS Group

We will share or otherwise process your personal data with entities in the UBS Group and in accordance with the Purposes reflected in this Appendix A above, for example:

- in connection with any services offered or provided by us or any other member of the UBS Group
- to facilitate carrying on the business of the UBS Group and providing services to clients on a global basis
- for risk control including internal approvals processes
- to warehouse appropriate information within a single jurisdiction in order to co-ordinate the services and business activities of the UBS Group
- to pass on information about you to any members of the UBS Group in connection with any services which we think you or your organization may be interested in
- in connection with financial or regulatory reporting purposes.

b. External recipients of data

We may transfer personal data about you:

- to public entities and institutions (e.g., regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitral bodies, fraud prevention agencies)
- to other credit and financial service institutions or comparable institutions in order to carry on a business relationship with you or your organization (depending on the contract, e.g., correspondent banks, custodian banks, brokers, securities exchanges, credit rating agencies)

- to third parties in connection with transactions that members of UBS Group are involved in (e.g., correspondent banks, brokers, exchanges, central clearing counterparties, depositories, trustees, trade repositories, processing units and third-party custodians, issuers, investors, prospective buyers and other transaction participants and their representatives)
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets to a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data to
- to professional advisors including law firms, accountants, auditors and tax advisors
- to insurers
- to service providers and agents appointed by us for the purposes given. These are companies in the categories of IT services, logistics, printing services, telecommunications, advice and consulting, transaction processing and settlement services, and sales and marketing and translation services.

Appendix B

Processing Activities of General B2B Contacts

Types of Personal Data

- Your contact details (e.g., name, phone number, email address, physical address, IP address, or personal/social media content)
- Information about your position and the role in your organization
- Communications data (e.g., copies of your electronic communications or recorded phone conversations with us)
- Other information that you provide to us or that we derive from your interactions with us.
- We will not collect sensitive personal data without your consent

Why We Process your Personal Data (“Purpose”)

- To communicate, interact and form relationships with you
- To fulfill legal or regulatory obligations
- To further our global compliance, risk, and security programs
- To complete activities necessary to conduct our global business and infrastructure
- To invite you to UBS events and programs

Who We Share Your Personal Data With

- We will share or otherwise process your personal data with entities in the UBS Group and in accordance with the Purposes reflected in this Appendix B above, for example
- Our global UBS affiliates, counterparties, corporates and service providers
 - Regulators and other governmental bodies
 - Third parties facilitating or participating in UBS events or programs
 - Potential buyers in a potential M&A transaction
 - Anyone you have consented for us to share your personal data