

Credit Suisse Trust Group Privacy Statement

Data privacy is important – please read the statement below.

Credit Suisse Trust Group (meaning Credit Suisse Trust AG, Switzerland, Credit Suisse Trust Holdings Limited, Guernsey, and each of their subsidiaries, referred to as “**CSTG**”, “**we**” or “**us**”) has issued this Privacy Statement to inform you as to how CSTG looks after your personal data. We therefore kindly ask you to familiarize yourself with the personal data protection information set out below. This Privacy Statement should be read in conjunction with CSTG’s Terms & Conditions of Business.

The following information gives an overview of how CSTG collects and processes your personal data, as well as of your rights under data privacy laws.

1. **Who is responsible for data processing and how can I contact them?**

CSTG consists of a number of entities, each of which are separate legal entities and which are subsidiaries and/or affiliates of UBS Group AG, Switzerland (UBS Group AG, Switzerland, together with all its affiliates and subsidiaries, including CSTG, referred to as “**UBSG**”). The CSTG entities act as independent data controllers. If you have any questions regarding this Privacy Statement, please contact the appropriate entity using the contact details listed below.

CREDIT SUISSE TRUST LIMITED, BAHAMAS
P.O. Box N3023 Bahamas Financial Centre
Shirley & Charlotte Streets,
Nassau
Bahamas

CREDIT SUISSE TRUST LIMITED, GUERNSEY
P.O. Box 122 Helvetia Court South Esplanade
St. Peter Port
Guernsey GY1 4EE
Channel Islands

CREDIT SUISSE TRUST AKTIENGESELLSCHAFT, LIECHTENSTEIN
Pradafant 21
Postfach 1215 FL-9490
Vaduz
Principality of Liechtenstein

CREDIT SUISSE TRUST LIMITED, SINGAPORE
One Raffles Link, # 05-02, South Lobby
039393 Singapore
Singapore

CREDIT SUISSE TRUST AG, SWITZERLAND
Hagenholzstrasse 20/22
8050 Zurich
Switzerland

2. **What data do we use and where is it obtained from?**

We process personal data obtained from a number of sources including, but not limited to:

- yourself and other persons connected with your wealth planning structure, such as the (economic) settlor(s), (economic) founder(s), beneficiary(ies), charitable organizations, contracting partner(s), protector(s)/enforcer(s), partners (i.e. in case of a partnership), holder(s) of a power of attorney, third party directors, external asset or investment managers, other non-UBSG introducers of intermediaries, (collectively referred to as **“Structure Relevant Party/ies”**) through applications for services, by telephone, emails, letters, mobile applications or other communications or documents;
- other third parties, including professional advisors, insurers, fraud prevention agencies and government and law enforcement agencies;
- other entities within UBSG; and
- publicly accessible sources, including debt registers, land records, commercial and association registers, the press, and the internet.

We may process the following categories of personal data:

- personal details (e.g. name, marital status, number of children, address, other contact data, date and place of birth, nationality, national insurance or social security numbers);
- identification data (e.g. tax identification number (TIN), passport or ID card, driving license, property register identification), and authentication data (e.g. specimen signature);
- professional details (e.g. position, industry and employer, membership of professional associations or bodies);
- public positions (e.g. governmental or international organizations);
- data from the fulfilment of contractual obligations (e.g. sales data in payment transactions, file notes or minutes from consultations with you);
- information about your financial situation (e.g. creditworthiness data, scoring/rating data, origin of assets, tax residency, shareholdings, benefits, mortgage information, underlying source of income, funds and wealth);
- business contact information (e.g. office phone number, email, mail address); and
- marketing and sales data.

We may also process the following special categories of personal data, which requires additional considerations due to their sensitivity:

- personal data revealing racial or ethnic origin, political opinions (including political party

positions), religious or philosophical beliefs, or trade union membership; and

- data concerning physical or mental health or data concerning a natural person's sex life or sexual orientation;
- data relating to criminal convictions, the commission or alleged commission of any offence, or any proceedings for any offence committed (or the disposal of such proceedings or the sentence of any court in such proceedings).

3. Why do we process your data and on what legal basis?

We process your personal data for a number of reasons, which are set out in the table below (purpose of processing), together with the legal basis we rely on to process your personal data for each purpose. This table also explains our legitimate interests in processing your personal data (where relevant), which must not conflict unfairly with your own interests.

Purpose of processing	Legal Basis	Legitimate interests (if relevant)
To enable us to provide the services as part of the execution of a contract, to respond to queries and complaints from you and other Structure Relevant Parties, and to ensure an efficient management of the relevant wealth planning structure	Contractual obligation Legitimate interests	<ul style="list-style-type: none"> ■ Being efficient and effective in how we provide services and fulfil our legal and contractual duties
To benefit from the expertise of UBSG, operational and technical resources of UBSG, including its subsidiaries and affiliates, including via the provision and receipt of services on an intra-group basis	Legitimate interests	<ul style="list-style-type: none"> ■ Being efficient and effective in how we provide services and fulfil our legal and contractual duties
Administrative purposes	Legitimate interests	<ul style="list-style-type: none"> ■ Keeping records up to date ■ Being efficient and effective in how we provide services and fulfil our legal and contractual duties ■ Complying with rules and guidance from the regulators
For the management and business development	Legitimate interests	<ul style="list-style-type: none"> ■ Informing the development of products and services

Purpose of processing	Legal Basis	Legitimate interests (if relevant)
<p>purposes of CSTG and UBSG, including the centralized collation of data and the production of reports to be used as tools for decision making by our management and for our marketing activities</p>		<ul style="list-style-type: none"> ■ Determining the price to charge for products and services ■ Keeping records up to date ■ Determining which products and services may interest you and telling you about them ■ Defining types of customers for new products or services
<p>For electronic marketing</p>	<p>Consent</p>	
<p>For the purpose of:</p> <p>(i) the prevention and investigation of crimes (including, but not limited to internal and external investigations, internal and external audits);</p> <p>(ii) facilitating and providing centralized Automatic Exchange of Information (AEI) and Common Reporting Standard (CRS) to the tax authorities of relevant jurisdiction(s); and</p> <p>(iii) providing information to the courts, regulatory authorities or law enforcement agencies</p>	<p>Legal obligation</p> <p>Legitimate interests</p>	<ul style="list-style-type: none"> ■ Developing and improving how we deal with crime, as well as fulfilling our legal and regulatory duties in this respect ■ Complying with rules and guidance from regulators ■ Being efficient in how we provide services and fulfil our legal and contractual duties
<p>To comply with legal and regulatory obligations that apply to us</p>	<p>Legal obligation</p>	<ul style="list-style-type: none"> ■ Complying with applicable laws and regulations ■ Complying with rules and guidance from regulators
<p>To comply with our and UBSG's know your client/anti-money laundering, operational and risk management framework,</p>	<p>Legal obligation</p> <p>Contractual obligation</p> <p>Legitimate interests</p>	<ul style="list-style-type: none"> ■ Developing and improving how we deal with crime, as well as fulfilling our legal duties in this respect

Purpose of processing	Legal Basis	Legitimate interests (if relevant)
including credit risk, identity checks including nationality and residency checks, age checks and fraud. This may also involve fulfilling our and UBSG's control and reporting obligations under financial regulation, as well as measuring and monitoring risks	Consent	<ul style="list-style-type: none"> ■ Complying with rules and guidance from regulators ■ Being efficient in how we provide services and fulfil our legal and contractual duties
Guaranteeing our and UBSG's IT security and IT operations	Legitimate interests Legal obligation	<ul style="list-style-type: none"> ■ Developing and improving how we deal with crime, as well as fulfilling our legal and regulatory duties in this respect ■ Complying with rules and guidance from regulators ■ Being efficient in how we provide services and fulfil our legal and contractual duties
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), as well as measures for building and system security (e.g. access controls)	Legitimate interests	<ul style="list-style-type: none"> ■ Developing and improving how we deal with crime, as well as fulfilling our legal and regulatory duties in this respect ■ Complying with rules and guidance from regulators ■ To maintain the security of our businesses and premises
We may monitor, record, store and use any telephone, email or other communication with you (whether incoming or outgoing) in order to check any instructions given to us, for training purposes, in order to comply with our regulatory and internal audit requirements for crime prevention and to improve the quality of our customer	Legitimate interests Legal obligation	<ul style="list-style-type: none"> ■ Developing and improving how we deal with crime, as well as fulfilling our legal and regulatory duties in this respect ■ Complying with rules and guidance from regulators ■ Training our staff

Purpose of processing	Legal Basis	Legitimate interests (if relevant)
service.		

For the processing of special categories of personal data identified in section 2, we also rely on one of the following legal bases in addition to one of the other bases set out in the table above:

- substantial public interest (such as preventing, detecting and prosecuting unlawful acts and fraudulent behaviour);
- to establish, exercise or defend legal claims; or
- explicit consent.

Where we are required to seek your consent in order to process your personal data (e.g. for electronic marketing), we will ask for this separately. We will provide you with sufficient information in order for you to understand what you are consenting to, and you will always have the right to withdraw your consent.

4. **Who receives my data?**

We may share your personal data with the following recipients in connection with any of the purposes listed in the table in section 3:

- any member or affiliate of CSTG which provides any service or facilitates communication with regard to the services provided by CSTG in relation to your wealth planning structure;
- any member or affiliate of UBSG;
- any banking or other institution with whom we conduct business in connection with your wealth planning structure;
- accountants, auditors, legal and other advisors, directors or agents who render any service in connection with the services to be provided by us in relation to the entities of your wealth planning structure;
- third party service providers that may receive and process such data on behalf of CSTG. This may involve third parties that perform any of our duties, functions or business activities that we are permitted to outsource under any legal and/or regulatory requirement, e.g. FATCA;
- third parties in relation to any activities related to mergers, acquisitions or corporate restructuring;
- law enforcement agencies, regulators or other public authorities pursuant to any legal and/or regulatory requirement and/or order, court order or sanction;
- courts, tribunals and other dispute resolution forums;
- credit reference agencies; or
- other recipients for which you have given us permission to share data with or for which you have released us from trust client confidentiality in accordance with a declaration or

consent.

5. Will data be transferred to a third country or an international organization?

We may transfer personal data to recipients worldwide, both located in member states of the European Economic Area (EEA) and in countries outside the EEA. Some of these transfers may be to recipients in countries that do not have regulations, confidentiality and data protection laws comparable to the data protection laws of the country in which the wealth planning structure(s) is/are administered by us and, in particular, to countries that do not have laws protecting personal data as implemented in Switzerland or EEA member states. Where this is the case, we will put appropriate safeguards in place to make sure your personal data is kept secure, such as permitted data transfer mechanisms or approved standard form contracts with the recipient. Please contact us if you would like to see a copy of the specific safeguards that apply to the transfer of your data.

6. For how long will my data be stored?

We will only process and store your personal data for as long as it is needed in order for us to provide our services and to fulfil our contractual and legal obligations. We keep your information in line with our applicable data retention policy(ies).

Once the customer relationship has ended, we will retain your records for a prudential period in order to comply with our legal and regulatory requirements (for example for tax purposes or to ensure that it can be retrieved where it is relevant to any complaints or legal actions that we may be party to). To help us do this, we apply criteria to determine the appropriate periods for retaining your personal data depending on its purpose. It may be necessary for us to store data for longer periods where we are under a legal or regulatory obligation to keep records (for example for anti-money laundering purposes and to help fight fraud or financial crime). If the data is no longer required for the fulfilment of contractual or legal obligations, it is regularly deleted.

7. What data privacy rights do I have?

Depending on your location and the laws that apply to your relationship with us, you may have the following rights in relation to your personal data:

- the right of access and to receive information on personal data collected from you;
- the right to rectification;
- the right to erasure;
- the right to restrict processing (including for the purposes of direct marketing); and
- the right to data portability.

If applicable to you, you also have the right to make a complaint to your local data protection authority.

If we have separately asked for your consent to process your personal data, you can withdraw that consent at any time.

Please note that the withdrawal of consent only applies to the future processing of your personal data and does not have retrospective effect. Processing that was carried out before consent

was withdrawn remains unaffected by it. If you withdraw your consent we may not/no longer be able to provide services and maintain a business relationship with you.

8. Do I have the right to object to data processing?

You can object to processing of your personal data at any time. If you submit an objection, we will no longer process your personal data unless we can provide evidence of mandatory requirements or legitimate reasons for processing, which outweigh your interests, or processing serves the enforcement, exercise, or defence of legal claims. Please note that in such cases we will not be able to continue to provide services and maintain a business relationship with you.

9. The right to object to data processing for direct marketing purposes

In individual cases, we process your personal data in order to conduct direct marketing. You have the right to object to the processing of your personal data for direct marketing purposes at any time. This also applies to profiling, where it is connected with direct marketing.

If you object to processing for the purpose of direct marketing, we will no longer process your personal data for this purpose.

The objection does not need to be made in a particular form. It should be addressed to:

Credit Suisse Group Data Protection Officer
Credit Suisse AG, London Branch
One Cabot Square
London E14 4QJ
United Kingdom

E-mail: data.protection@credit-suisse.com

10. Am I obliged to provide data?

In the context of the business relationship with CSTG, you must provide all personal data that we require to accept and maintain a relationship and carry out and fulfil the accompanying legal and regulatory obligations, contractual or otherwise, and you must provide all personal data that we are legally obliged to collect. Without this data, we are, in principle, not in a position to enter into or maintain a business relationship.

In particular, anti-money laundering regulations require us to identify you on the basis of your identification documents before establishing a business relationship and to collect and put on record your name, place and date of birth, nationality, address and identification details for this purpose. In order for us to be able to comply with these statutory obligations, you must provide us with the necessary information and documents in accordance with the applicable anti-money laundering regulations, and you must immediately notify us of any changes over the course of the relationship. If you do not provide us with the necessary information and documents, we cannot enter into or continue the business relationship with you.

11. Is automated decision-making used?

In establishing and conducting a business relationship, we generally do not use any fully automated decision-making. If we use this procedure in individual cases, we will inform you of this separately, if we are legally required to do so, and you have a right not to be subject to decisions based on fully automated processing.

12. Will profiling take place?

We process some of your data automatically, with the goal of assessing certain personal aspects (profiling). For example we use profiling to fulfil certain legal and regulatory requirements. We are required to combat money laundering, terrorism financing, and fraud, as well as to assess risk and offenses that pose a danger to assets. In doing so, data analyses (including of payment transactions) are carried out. These measures serve to protect you.

13. What about biometric data?

Biometric data is classified as sensitive personal data under some data protection laws. Therefore, your explicit consent will be required in a separate process, if the use of your Touch ID or other biometric identification is necessary to access certain applications and if such applications are used.

14. Contact us

If you have any questions or complaints about how your personal data is processed or would like to exercise your rights in relation to your personal data, please contact us at:

Credit Suisse Group Data Protection Officer
Credit Suisse AG, London Branch
One Cabot Square
London E14 4QJ
United Kingdom

E-mail: data.protection@credit-suisse.com