

Extract from the Client Information Booklet 9. Data Protection Information

The following data protection information gives an overview of the collection and processing of your Personal Data (as defined below). Translations in other languages of this section 9 of the Client Information Booklet, including Appendix 3 and 4 are available under <http://www.credit-suisse.com/lu/en/private-banking.html>



Table of contents

9. Data Protection Information	3
9.1 Who Is Responsible For Data Processing and How Can You Contact Them?	3
9.2 What Sources and Data Do We Use?	4
9.3 What Do We Process Your Personal Data for (Purpose of Processing) and On What Legal Basis?	5
9.4 Who receives Your Data?	8
9.5 Will Data Be Transferred to a Third Country or an international organization?	8
9.6 Use of electronic means of communication	8
9.7 For How Long Will Your Data Be Stored?	8
9.8 What Data Privacy Rights Do You Have?	9
9.9 Are You Obligated to Provide Data?	9
9.10 To What Extent Is There Automated Decision-Making?	10
9.11 Will Profiling Take Place?	10
9.12 May we collect biometric Data from You?	11
9.13 Non-EU country specific privacy notices	11
Appendix 3	12
Appendix 4	20

9. Data Protection Information

With the following information, we would like to give an overview of how we will process Your Data (as defined below) and of Your rights according to data protection laws and regulations (“**Data Protection Information**”). As the Bank has become part of UBS Group any reference to “**GROUP**” or “**GROUP Entities**” throughout this document shall include both Credit Suisse and UBS Group entities.

The details on what data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

“**You**” and “**Your**” as used in this information refers to individuals (*and/or legal entities for the purpose of professional/banking secrecy only*):

- who themselves are our Clients; or
- who are involved in the business relationship, as the case may be, such as authorized representatives, persons holding a power of attorney, beneficial owners, if different from the Client, any natural person who exercises control over an entity (control is generally exercised by any natural person who ultimately has a controlling ownership interest in an entity, “**Controlling Person**”) and any person for the benefit of which the Client is holding an account as agent, nominee or similar (account holder for automatic exchange of information purposes, “**AEI Account Holder**”), (each an “**Affected Person**”); or
- with whom we come into contact, or in respect of whom we obtain personal data, in the usual course of dealings with You, our service providers, and our other business counterparties or transaction participants, which may include, without limitation, employees, directors, officers, beneficial owners and other personnel of such clients, service providers, business counterparties or transaction participants, in all cases outside the GROUP (as applicable to You, “**Your Organization**”).

“**Data Protection Legislation**” means any law and/or regulation (including guidance and codes of practice issued by authorized data protection regulators) which is applicable to the processing of Your personal data by us, and which shall include, but is not limited to the EU General Data Protection Regulation (2016/679) (“**GDPR**”) and applicable EU member states’ national legislation amending and/or supplementing the **GDPR**.

9.1

Who Is Responsible For Data Processing and How Can You Contact Them?

The Data controller (hereinafter referred to as “**we**” or “the **Bank**”) is:

CREDIT SUISSE (LUXEMBOURG) S.A.
5, rue Jean Monnet
L-2180 Luxembourg
Grand Duchy of Luxembourg
Phone: +352 46 00 11-1
Fax: +352 46 32 70

In case of any questions or requests concerning Your Personal Data (as defined below), You may contact either:

CREDIT SUISSE (LUXEMBOURG) S.A.
Data Protection Office Representative
5, rue Jean Monnet
L-2180 Luxembourg
Grand Duchy of Luxembourg
Phone: +3520 46 00 11-1
Email: luxembourg.data-protection@credit-suisse.com

or

CREDIT SUISSE SERVICES AG, LONDON BRANCH
Credit Suisse Group Data Protection Officer
One Cabot Square
London E14 4QJ
Great Britain
Email: data.protection@credit-suisse.com

(hereinafter referred to as “**Data Protection Office**”)

9.2

What Sources and Data Do We Use?

Data from You:

We process **Personal Data** (also referred to as “**Data**”) about You, as defined below, that we obtain from You in the context of our business relationship with You (as applicable). We do this in order to facilitate, enable and/or maintain that relationship and/or to provide services to You or for other reasons specified below. In addition, in carrying on our business relationship with You, information may be collected about You by other means (e.g. recording of telephone calls, email communication journaling). In these circumstances, the information is not accessed on a continuous or routine basis.

Data from other sources:

We also process personal data about You that we obtain from publicly accessible sources (e.g. commercial registers, press including trade press or paid for content, publicly available websites and other publicly available sources of information such as sanctions lists or lists of directors disqualifications) or that is legitimately transferred to us by other GROUP Entities or from other third parties. These may include third parties not related to You, such as 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.

Types of personal data:

The types of personal data we process may include, without limitation:

- identification details relating to You (name/company name, date and place of birth/ date and place of incorporation, nationality, gender, domicile/registered office)
- contact details, including private and/or business phone numbers, postal and email addresses

- identification data such as passports, bylaws and extract of commercial register, National Insurance or Social Security numbers, driving license, ID cards, property register identification, social network user names, 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 fulfilment 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
- dietary and access requirements (e.g. for event organization purposes) data from Your interactions with us, our branches, our internet websites, 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

(“**Personal Data**” or “**Data**”).

“**Processing**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

9.3

What Do We Process Your Personal Data for (Purpose of Processing) and On What Legal Basis?

We process Personal Data in accordance with the provisions of the Data Protection Legislation on the following legal grounds:

- a) If processing of Personal Data is necessary for the fulfilment 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 fulfil, such legal agreement).

You may find further details about the purposes of Data processing in the relevant contractual documents and/or the GTC.

b) Due to legal obligations

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

The purposes of processing may include, without limitation:

- identity checks, fraud and financial crime and market abuse prevention or detection. If fraud is detected, certain services may be refused
- fulfilling control and reporting obligations under applicable financial regulations including securities 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 GROUP.

c) For purposes of legitimate interests

We may process Your Personal Data for the purposes of the **legitimate interests** pursued by the Bank, Branches of the Bank or a third party, for example in:

- developing, deploying and supporting our products and services
- developing and furthering our business and business relationships, and keeping our clients and other stakeholders satisfied
- protecting our businesses and the integrity of the financial markets
- assessing, managing and reporting risk efficiently and effectively
- 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 GROUP Entities in pursuing the above interests.

The purposes for which we may process Your Personal Data (in connection with the above interests) include the following without limitation:

- carrying on business relationships with clients and other parties
- providing services to clients

- performing obligations and exercising rights under and otherwise carrying out contracts, or taking pre-contractual measures with You or a third party
- management of the businesses and further development of services and products
- reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions
- marketing or market and opinion research
- obtaining personal data from publicly available sources for client acquisition/review 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 Luxembourg and/or the Branch locations
- 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
- 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 across the GROUP
- consulting with credit rating agencies to investigate creditworthiness and credit risks where we may have an exposure to You
- securing and operating 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)
- performance of contracts including those contracts to which the data subject is not a (direct) party (e.g. in respect Data of Affected Persons or Your Organization's personnel);
- mergers, acquisitions and re-organizations including by providing Your Personal Data to (future) purchasers or transferees.

Whenever we intend to rely on legitimate interest as the legal basis for the processing of Personal Data, we will give due consideration to Your rights and freedoms.

d) As a result of **Your consent**

There may be circumstances where we ask for **Your consent** to process Your Personal Data. 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 9.1 above). Withdrawal of consent does not affect the legality of Data processed prior to withdrawal.

9.4 **Who receives Your Data?**

Within the Bank, every unit that requires Your Data will have access to it in order for the Bank to achieve purposes described in section 9.3. As regards to Clients serviced by the Branches of the Bank, the Bank processes Your Data and shares such Data with the Branches to which the Data relates and vice versa on a need-to-know basis. In this respect, the Bank and its respective Branch act as joint Data Controllers. As regards to the processing of Data by the Branches of the Bank please refer to **Appendix 4**, entitled “**Additional Data Protection Information relating to the Branches of CREDIT SUISSE (LUXEMBOURG) S.A.**”.

The data recipients **outside the Bank** and its Branches are hereinafter referred to as “**Data Recipients**”. Please refer to the overview of all Data Recipients outside the Bank and the Branches of the Bank outlined in the **Appendix 3**, entitled “**List of Data Recipients**”.

9.5 **Will Data Be Transferred to a Third Country or an international organization?**

In certain circumstances, we may transfer Your Data to Data Recipients located in **third countries** (countries outside the European Economic Area). You understand that the data protection legislation in such third countries may not give You as much protection as the data protection legislation in the country where You are located.

For transfers to third countries which have not been determined by EU Commission as countries offering an adequate level of data protection, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with You such as when making an international payment), or implement appropriate safeguards such as standard contractual clauses approved by the EU Commission to ensure the protection of Your Personal Data.

Please contact our Data Protection Office if You would like to request to see a copy of the specific safeguards applied to the export of Your Data if applicable. Contact details are provided in section 9.1 above.

9.6 **Use of electronic means of communication**

The Bank may use any means of communication, including electronic means such as email, to share, disclose and/or transfer Personal Data in order to achieve the purposes outlined in section 9.3. For further details relating to the use of electronic means of communication please refer to the section entitled “Data Protection and Professional Secrecy” in the GTC.

9.7 **For How Long Will Your Data Be Stored?**

We will process and store Your Personal Data **for as long as it is lawful** for us to do so. It should be noted here that our business relationship is based on a long-term obligation, which is set up on the basis of periods of years.

We will normally retain Your records for a minimum of ten years to comply with legal, regulatory and contractual requirements (for example Luxembourg Commercial Code and Law of April 5, 1993 on the financial sector, as amended), unless there is a

particular reason to hold the records for longer, including legal hold¹ requirements, which require us to keep records for an undefined period of time.

9.8

What Data Privacy Rights Do You Have?

In relation to Your Personal Data, and to the extent permitted under the Data Protection Legislation You have the right:

- to request access to Your Personal Data
- to request the rectification of inaccurate or incomplete Personal Data
- to request deletion of Your Personal Data
- to request the restriction of the processing of Your Personal Data
- to data portability

In addition to the above rights, you have the **right to object** at any time to:

- the processing of Your Personal Data for direct marketing purposes, and profiling to the extent related to direct marketing and
- the processing of Your Personal Data for the reasons set out in section 9.3 c) (“legitimate interest”) of this statement (including profiling for these purposes), to the extent permitted under the Data Protection Legislation.

To exercise any of the above rights You do not need to use a particular form but you should write to our Data Protection Office in accordance with section 9.1 of this statement. We will then assess and respond to Your request to exercise Your rights.

Please note that some of the above rights are subject to limitations in some situations, and that the exercise of the above rights may affect our ability to continue a business relationship with You.

If applicable, You also have a right to make a complaint to any competent supervisory authority.²

You may also withdraw the consent granted to us for the processing of Your Personal Data at any time by contacting the Data Protection Office (see section 9.1 above). Please also see section 9.3 d) for further details on consent.

9.9

Are You Obligated to Provide Data?

In the context of our business relationship, You may need to provide certain Personal Data that is required for accepting and carrying out a business relationship, fulfilling contractual obligations or that we are legally obliged to collect. **Without this Data, we may not be in a position to enter into a legal agreement, provide services, or initiate or maintain a business relationship.** For example, anti-money laundering regulations may require us to identify You on the basis of Your identification documents before establishing a business relationship and to collect and put on record name, place and date of birth, nationality, address and identification details for this purpose.

¹ A legal hold is a process that an organization uses to preserve all forms of relevant information in case of pending or anticipated litigation, investigation and other legal proceedings.

² E.g. Luxembourg data protection authority: the Commission nationale pour la protection des données (CNPD) (<https://cnpd.public.lu>) or the data protection authority of your country of residence (if within the European Union).

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 such regulations, and to immediately disclose any changes over the course of the business relationship. If You do not provide us with the necessary information and documents, we cannot enter into or continue the business relationship You require.

9.10

To What Extent Is There Automated Decision-Making?

In establishing and carrying out a business relationship, we generally do not use any fully automated decision-making pursuant to the Data Protection Legislation. If we use this procedure in individual cases, we will inform You of this separately, provided this is a legal requirement.

9.11

Will Profiling Take Place?

We **process** some of Your Personal Data **automatically with the goal of assessing certain personal aspects (profiling)**.

For example, we use profiling in the following ways and/or for the following purposes:

- Due to **legal and regulatory requirements**, we are required to combat money laundering, terrorism financing, fraud, assess risk and offences that pose a danger to assets. Data assessments (including on payment transactions) are also carried out for this purpose. At the same time, these measures also serve to protect You.
- We may use scoring as part of the **assessment of Your creditworthiness**. This calculates the probability that a Client will meet the payment obligations pursuant to the contract. This calculation may be influenced by the Client's earning capacity, expenses, pending liabilities, occupation, employer, term of employment, experience from the business relationship thus far, contractual repayment of previous credits, and information from credit information offices, for instance. Scoring is based on a mathematically and statistically recognized and established process. The calculated scores help us to make decisions in the context of product sales and are incorporated into ongoing risk management.
- To pursue the following **marketing-related purposes**: I) personalized marketing and advice tailored to the client and his situation, circumstances, and needs; II) market research; III) development of products, services and offerings of the Bank, other banks and GROUP Entities.

For these purposes, the Bank may: i) process client data obtained from its own sources (in particular account and payment transaction data, other transaction data, and other behavioral data, e.g. from activity on the Bank's website and mobile applications) and from publicly accessible sources, as well as from contractually affiliated data providers; ii) evaluate certain personal aspects of the client (profiling), such as the client's financial situation and personal interests, and create and evaluate client profiles; iii) disclose such data and profiles to other banks and GROUP Entities, including to third party service providers as set forth in more details in the overview of all Data Recipients outside the Bank and the Branches of the Bank outlined in the **Appendix 3, entitled "List of Data Recipients"**.

Reference is made in this context to **your right to object** as set forth in section 9.8.

9.12 **May we collect biometric Data from You?**
Biometric data is classified as sensitive Personal Data. Therefore, Your explicit consent will be required in a separate process to use Your Touch ID or other biometric identification to access certain applications.

9.13 **Non-EU country specific privacy notices**
Information for residents of California
Further information can be found online in our otherwise applicable data protection notices (including our California Consumer Privacy Act Annual Notice Supplement for clients of GROUP Entities domiciled in California, effective from January 1, 2020 at <https://www.credit-suisse.com/us/en/legal/privacy-statement.html>).

For all other questions, please contact us.data-protection@credit-suisse.com

Data Recipients

1.

Introductory note

The purpose of this document is to provide a detailed overview of the disclosure of Your Data and/or Client Information³ to **recipients outside the Bank (“Data Recipients”)**. This Appendix, which forms an integral part of the **Data Protection Information**, is to be read in conjunction with Art. 24 GTC and may be updated from time to time.

The GROUP operates and offers its services and products to its clients through subsidiaries and branches across the globe (each a “GROUP Entity” or together the “GROUP Entities”). All hold the necessary local licenses to operate their business. A complete list of the GROUP Entities including their location is available online⁴.

By coordinating its activities within the GROUP globally and using third party services, the Bank will be able to better meet its clients’ needs and continue providing them with high-quality services as well as GROUP-wide assessments and advisory services, while being in a position to meet regulatory requirements and expectations and manage risks.

Against this background, the Bank and other GROUP Entities may share or otherwise process Your Data and/or Client Information with other GROUP Entities and/or third parties

- a) in the context of outsourcing of certain functions (as set forth hereafter in point 2),
- b) independent of an outsourcing set-up (as set forth hereafter in point 3),
 - for the purposes of increasing operational effectiveness and/or to make best use of the Bank's resources and capabilities within the GROUP worldwide, to ensure an efficient and holistic servicing of our Clients,
 - to comply with legal and/or regulatory requirements,
 - to perform the Bank's contractual obligations in the context of our relationship with you, and/or
 - to pursue legitimate interests of the Bank and/or the GROUP.

For the purposes outlined above, dedicated persons and/or teams employed by or at the service of other GROUP Entities and/or third parties including their sub-contractors/agents (as further described below) may have access to, or be provided with, Data and/or Client Information and therefore be included in the definition of Data Recipients.

³ As defined in Art. 24 b GTC, i.e. any information relating to the client (individual and non-individual clients) and Affected Persons (if any), including documentation, entrusted to the Bank.

⁴ A comprehensive list of GROUP Entities is accessible under: <https://www.credit-suisse.com/corporate/en/investor-relations/financial-and-regulatory-disclosures/annual-and-interim-reports/annual-reports.html> in the latest annual report of the Credit Suisse Group AG, under the section “Significant subsidiaries and equity method investments.” (with respect to Credit Suisse entities) and under <https://www.ubs.com/global/en/investor-relations/complementary-financial-information/disclosure-legal-entities.html>; <https://www.ubs.com/global/en/investor-relations/complementary-financial-information/other-subsidiaries.html#tab-1824695174> (with respect to UBS entities). Upon request to the Relationship Manager, the Client(s) may obtain at any time a list of the GROUP Entities.

The following data sharing scenarios between the Bank and GROUP Entities apply also in the context of **Branch Client Relationships** (as defined in the separate **Appendix 4, “Additional Data Protection Information relating to the Branches of Credit Suisse (Luxembourg) S.A.”**), in which case the relevant GROUP Entities may provide services to the Branches of the Bank directly or indirectly, i.e. via the Bank. Nonetheless, the Branches of the Bank (as defined in the separate **Appendix 4**) may further decide, for the same purposes as outlined above, to share Personal Data and/or Client Information directly with the relevant GROUP Entities.

2. **Data Recipients in the context of outsourced services and/or activities**

The Bank may outsource certain operations, services and/or related activities **to other GROUP Entities** and in connection with such outsourcings, such other GROUP Entities may further outsource operations, services and/or related activities to other GROUP Entities. The Bank and other GROUP Entities may also (sub-) outsource operations, services and/or related activities to external service provider(s) and their sub-contractors (“**Third Party Service Providers**”).

The category of operations, services and/or related activities that may typically be outsourced accordingly are listed on an exemplary basis hereafter:

- Operational tasks and processes, including support activities related to the administration of client relationships and their assets (including corporate event, voting etc.)
- compliance and risk management related (support) activities
- certain IT (support) activities and/or services (including, the use of the information technology (IT) platform, services related to software, infrastructure and/or platform (including use of cloud technology), maintenance, development, creation of technical concept work, creation of user interface design, software development, test software, analysis of errors, defect and incident analysis, integration and deployment support services, user support, operation of IT systems, and data processing)
- the Bank’s email infrastructure (including communication journaling, which means that unalterable copies of emails are stored in a strictly confidential internal so-called journaling repository, e-mail security/anti-malware scanning and filtering services etc.), instant messaging and/ or chat services,
- online banking, reporting, trade transmission and/or trading applications
- (support) activities related to the assessment and/or management of risks (e.g. market, credit and other risks)
- reporting (e.g. Client, regulatory, tax, management), including individual case assessment, provision of general guidance and preparation of reports
- internal supervision, internal investigations and audit
- discretionary portfolio management and advisory services
- voice systems and voice/phone recording
- administration and management of business relationships with external asset managers
- internal workplace management or central data management

- offering electronic communication channels to clients
- marketing, including related profiling, and client event management
- physical documents lifecycle management, including archiving and destruction thereof
- issuance, management and mailing of Client invoices
- the production and preparation of the yearly Client tax reporting,
- the function of the Group Data Protection Officer and related support activities etc.

GROUP Entities that may serve as Data Recipients are **established worldwide**.

Third Party Service Providers that may serve as Data Recipients are established in

- **Luxembourg**

and/or

- **countries offering an adequate level of data protection as specified in the list of countries published by the European Commission** ([Adequacy decisions | European Commission \(europa.eu\)](#)), such as without limitation Switzerland, United Kingdom, EU member states (e.g. Germany, Romania, Netherlands, Poland)

and/or

- the **US, India and Singapore**, with which the Bank or the relevant GROUP Entities and/or Third Party Service Providers have concluded confidentiality agreements to ensure appropriate safeguards in respect of the protection of the processing of personal data and of the professional secrecy obligations equivalent to those stemming from the Luxembourg standards. In that context, the Bank and/or the relevant GROUP Entities has taken reasonable technical and organizational measures to ensure the confidentiality on the Data and/or Client Information transmitted and to protect such data against any unauthorized processing, taking into account that the level of protection for such data in third-countries may not be the same as in the European Union. The Third Party Service Providers and/or other GROUP Entities are either subjected by law to a professional secrecy obligation or will be contractually bound to comply with strict confidentiality rules. Data and/or Client Information that will be transferred will only be accessible to a limited number of persons within the relevant Third Party Service Providers and/or other GROUP Entities, on a need-to-know basis.

The Data Recipients referred to before may be required to further disclose Your Data and/or Client Information to authorities or other third parties in accordance with applicable law or regulations, e.g. for the purpose of anti-money laundering or combating terrorist financing, tax reporting purposes, law enforcement purposes etc.

The Client hereby acknowledges that the Third Party Service Providers and/or other GROUP Entities are not subject to the Luxembourg professional secrecy rules and that the professional secrecy that may be applicable to them may be less stringent than the Luxembourg professional secrecy legislation.

Where possible or practicable, Data and/or Client Information will be processed in masked, encrypted or tokenized form.

3. **Data Recipients and Data and/or Client Information processing incl. sharing independent of an outsourcing set-up**

Data and/or Client Information may be processed (incl. disclosure, storage etc.) by the Bank and/or the following Data Recipients worldwide independent of an outsourcing set-up especially in order to comply with legal/regulatory requirements, in the context of the performance of contracts and/or to pursue legitimate interests of the Bank and/or (any or all of the) GROUP Entities:

3.1 GROUP Entities domiciled in EU member states⁵ and Switzerland

In the context of the mandatory automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements ("DAC 6"), e.g. for the purpose of avoiding multiple reporting of the same reportable cross-border arrangement, the Bank may share Data and/or Client Information relating to the Client or any other persons involved in reportable cross-border arrangements with other GROUP Entities domiciled in EU member states and/or Switzerland.

3.2 GROUP Entities worldwide⁶

Your Data and/or Client Information may be processed by and exchanged between GROUP Entities to comply with legal or regulatory requirements, information requests by foreign supervisory authorities or for compliance-related reasons (e.g. the GROUP Entities and/or the Bank's reporting obligations, management of market and credit risks, operational risks incl. IT risks and general crime prevention, the identification and the management of money laundering risks, conflict of interests and reputational risks at the level of the Bank, GROUP Entity/-ies and/or at GROUP level). Such legal or regulatory requirements and/or requests, or compliance-related reasons, may be linked to Luxembourg or foreign law or regulatory requirements applicable to or applied by the GROUP Entity/-ies (e.g. based on internal policies) and/or applicable or linked to the client relationship and/ or transaction.

Your Data and/or Client Information may be furthermore processed by and exchanged between GROUP Entities for operational purposes, data quality assessment and management, internal supervision and investigations, management of corporate communication and/or for the defence of the Bank's, other GROUP Entities or the GROUP's interests (e.g. in the context of potential litigations), for audit purposes, Client event and business (risk) management, reporting including individual case assessment, provision of general guidance for and preparation of reports (e.g. Client, regulatory, tax, management), for IT purposes and/or to increase internal operational effectiveness and to make best use of the resources and capabilities within the GROUP worldwide (e.g. for internal workplace management or central data management) mainly to ensure an efficient and holistic servicing of our Clients (e.g. for offering electronic communication channels to clients).

⁵ https://europa.eu/european-union/about-eu/countries_en#the-27-member-countries-of-the-eu

⁶ A comprehensive list of GROUP Entities is accessible under: <https://www.credit-suisse.com/corporate/en/investor-relations/financial-and-regulatory-disclosures/annual-and-interim-reports/annual-reports.html> in the latest annual report of the Credit Suisse Group AG, under the section "Significant subsidiaries and equity method investments" (with respect to Credit Suisse entities) and under <https://www.ubs.com/global/en/investor-relations/complementary-financial-information/disclosure-legal-entities.html>; <https://www.ubs.com/global/en/investor-relations/complementary-financial-information/other-subsidiaries.html#tab-1824695174> (with respect to UBS entities). Upon request to the Relationship Manager, the Client(s) may obtain at any time a list of the GROUP Entities.

Your Data and/or Client Information may be furthermore processed by and exchanged between GROUP Entities for business purposes to improve (i) the understanding by the GROUP of the relationship the Client has holistically with the Bank and other GROUP Entities, (ii) the understanding of the needs and preferences of the Client, and iii) the offering and marketing, including profiling, of products and services holistically by the GROUP.

3.3 Third parties including public authorities worldwide

3.3.1. For the purpose of the performance of relevant contracts, in connection with the opening and maintenance of a banking relationship with You, transactions the Bank carries out for You, products the Bank offers to You or for which it acts as intermediary for You and/or other services the Bank provides to You, including, without limitation, if they present a foreign connection, the Bank – if applicable through its service providers – may transfer Your Data and/or Client Information to third parties that are involved in or otherwise entitled to get access to information related to these transactions and services, such as **other financial service institutions, comparable institutions, insurance companies, their service providers and/or authorities**, in Luxembourg, in countries where Branches, affiliates and/or the service providers of the Bank are established and/or in other countries (e.g. linked to Your transaction) . Depending on the transaction/service Data Recipients may include other GROUP Entities or third parties such as, other banks (e.g. correspondent banks), operators of payments systems, credit card service providers, insurance companies, sub-custodians, issuers and/or other target investments and their respective service providers (e.g. transfer agents, registrars), brokers, (stock) exchanges, processing units, (proxy) voting (advisory) service providers, central securities depositories, clearing institutions and the Society for Worldwide Interbank Financial Telecommunication (“**SWIFT**”) etc. and their service providers or processing units.

Disclosures may be required in relation to third parties to whom the Bank or any GROUP Entity – as the case may be on Your behalf – has a reporting obligation (e.g. trade repositories, authorities or (stock) exchanges, central (regulatory) registers, issuers) in accordance with applicable (implementing) legislation (e.g. European Market Infrastructure Regulation (“EMIR”), Markets in Financial Instruments Directive and Regulation (“MiFID/ MiFIR”), Securities Financing Transaction Regulation (“SFTR”), Shareholder Rights Directive (SRD II), related local implementing laws and EU Regulation(s), the law implementing DAC 6 and/ or exposed to disclosure requests in order to allow the transactions or services to be executed and/or to ensure compliance with relevant applicable (including foreign) laws, regulations, contractual provisions, and other rules, business practices, trade practices, and compliance standards and/ or to avoid penalties related to any non-compliance with such requests or obligations. Data and/ or Client Information may also have to be disclosed in order to establish segregated accounts for You with a sub-custodian (as may be required by law or upon your request) or to obtain investor and/or tax licenses/registrations. Even in relation to transactions within Luxembourg or countries where Branches of the Bank are established, Your Data and/or Client Information may need to be disclosed in other countries (e.g., in case a Payment Transaction is carried out using SWIFT).

In the context of DAC 6, e.g., for the purpose of avoiding multiple reporting of the same reportable cross-border arrangement, the Bank may share Data and/or Client

Information relating to the Client or any other persons involved in reportable cross-border arrangements with third parties domiciled in EU member states, which are also subject to the reporting obligation under DAC 6.

If You choose to use Bloomberg chat for the communication with the Bank, information transmitted over Bloomberg chat could also be viewed by third parties, including Bloomberg worldwide and GROUP Entities, thereby allowing conclusions to be drawn on the existence of a bank relationship with the Bank and the identity of the sender and/or the Client.

If You choose to deploy electronic signature services for entering into agreements and/or communication with the Bank, information transmitted (including Your Data) may be processed by the relevant third-party service provider (e.g., DocuSign) offering the technical infrastructure for such electronic signatures.

The Bank may also share Your Personal Data and/or Client Information with information offices (e.g., debt registers), search engines, internet platforms and/or with third party providers for the purpose of investigating creditworthiness, credit risk and solvency (in particular, in credit business) and/or for the purpose of gathering information for regulatory purposes. Your Data and/or Client Information may be furthermore processed by and exchanged with relevant third parties for mergers, acquisitions and re-organizations including by providing Your Personal Data to (future) purchasers or transferees.

The Data Recipients referred to before may be required to further disclose Your Data and/or Client Information to authorities or other third parties in accordance with applicable law or regulations, e.g., for the purpose of anti-money laundering or combating terrorist financing, tax reporting purposes, law enforcement purposes etc.

3.3.2.

The Bank, as the case may be through other GROUP Entities, may be especially required to disclose Your Data and/or Client Information **to authorities or other third parties in accordance with applicable law or regulations**, as outlined hereafter:

Under certain circumstances, the Bank may disclose Personal Data and/or Client Information to public entities and institutions in Luxembourg, in the countries where Branches of the Bank are established and/or other foreign countries (e.g. to bank and/or financial sector supervisory authorities, central banks, tax authorities, criminal prosecution authorities etc.) based on a legal and/or regulatory requests and/ or obligations, including any Luxembourg or foreign administrative, governmental or judicial authority in charge of imposing, adjudicating, monitoring, administrating and/or enacting, administrating and/or enforcing **economic or financial sanctions, trade embargoes or other similar restrictive measures**, such as the Luxembourg Government, the United Nations (UN), the European Union (EU), the State Secretariat for Economic Affairs of Switzerland (SECO) or the Swiss Directorate of International Law (DIL), the United States Treasury Department's Office of Foreign Assets Control (OFAC), His Majesty's Treasury of the United Kingdom (HMT), the Hong Kong Monetary Authority (HKMA), the Monetary Authority of Singapore (MAS).

Under the law of December 18, 2015 regarding the automatic exchange of information relating to financial accounts in tax matters, as amended, the Bank is obliged to report

certain Personal Data and/or Client Information relating to the Client, any **AEI Account Holder** or **Controlling Person**, as the case may be, in connection with the Automatic Exchange of Information ("**AEI**"), to the Luxembourg Tax Administration ("**LTA**"). This reporting is completed on an annual basis, and the LTA further transfers such Personal Data and/or Client Information to the competent tax authorities in any reportable jurisdiction(s), in which the reportable person is resident for tax purposes. Also, for the purposes of the AEI, the Bank is deemed to be data controller within the meaning of statutory regulations on data protection. The Personal Data and/or Client Information that the Bank is required to disclose to the LTA includes: name(s), address(es), country/ies of residence for tax purposes, tax identification number(s) ("**TIN(s)**"), date(s) and place(s) of birth, account number(s), the name of the Bank, account balance(s) or value(s) as of the end of the relevant calendar year or other appropriate reporting period if the account(s) was/were closed during the year, in the case of (a) custodial account(s), the total gross amount of interest, dividends and other income generated with respect to the assets held in the account(s), the total gross proceeds from the sale or redemption, and in the case of (a) depository account(s), the total gross amount of interest paid or credited regarding the Client and/or the Affected Person, as applicable. The Client's failure to provide Personal Data and/or Client Information required for the purposes of the AEI to the Bank may trigger a reporting in multiple jurisdictions.

Under the Luxembourg law of March 25, 2020 regarding the mandatory automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements (law implementing **DAC 6**), the Bank is obliged to report certain details of cross-border arrangements as well as Personal Data and/or Client Information relating to the Client or any other persons involved in reportable cross-border arrangements to the LTA and/or, if applicable, to local tax authorities in the countries where Branches of the Bank are established, including the relevant taxpayer's name, date and place of birth, residence for tax purposes, TIN, where appropriate the persons that are associated enterprises to the relevant taxpayer and the identification of any other person in a EU member state likely to be affected by the reportable cross-border arrangement including to which EU member states such person is linked. An arrangement will be reportable if (i) it concerns a covered tax, (ii) it is cross-border (i.e. involving another member state of the EU or a third party country), and (iii) it includes a characteristic or feature that presents an indication of potential risk of tax avoidance (so-called "hallmark").

Further, the Bank is subject to various US tax regulations and agreements, such as the US Foreign Account Tax Compliance Act ("**FATCA**") and the Qualified Intermediary regime ("**QI**") requiring the Bank to provide certain information relating to a **US Client** (as defined in the respective legislation) to the US Internal Revenue Service ("**IRS**") on a yearly basis ("**US Tax Reporting**"). Under the QI regime the reporting relates to US Clients with US securities, under FATCA the reporting relates to any bank assets/financial accounts held by US Clients. Under FATCA the US Tax Reporting obligation exists towards the LTA which passes such information on to the IRS. Under QI, in connection with US securities the US Tax Reporting is provided to GROUP Entities in Switzerland which in turn passes on such information to the US sub-custodian which then passes the information on to the IRS. For US Tax Reporting purposes, the Bank must report the Client's/any Controlling Person's name and address, a copy of any IRS Form W-9 "Request for Taxpayer Identification Number and Certification", TIN, assets, gross income and gross proceeds, as well as any other

information which may be required at any given time for the fulfillment of the US Tax Reporting obligations to which the Bank is subject.

3.3.3.

The Bank may disclose Data and/or Client Information to the following third parties in Luxembourg, in the countries where the Bank and/or GROUP Entities are established and/or in any other country:

- legal counsels – in particular, in the context of pending or reasonably foreseeable legal proceedings (including complaints to authorities), as the case may be, against the Bank or initiated by the Bank,
- courts and judicial or other public authorities,
- public notaries – in particular, for mortgage transactions and inheritance-related cases,
- other professional advisors (e.g. tax advisors, external evaluators) and external auditors

all being subject to confidentiality and/or professional secrecy obligations.

The above is especially applicable in cases where the Bank and/or other GROUP Entities aims to safeguard its/their own legitimate interests in connection with legal proceedings and in this context share Data and/or Client Information with third parties, in particular without limitation:

- in the event that the Client, Affected Persons or counterparties linked to relevant assets threaten to initiate or initiate or in the event the assets (may) trigger legal measures, criminal charges or other notifications to authorities against the Bank, and/or other GROUP Entities in Luxembourg and/or abroad (also as a third party),
- relating to the Bank's claims against the Client incl. to realize collateral provided by the Client or third parties in Luxembourg and/or abroad,
- in the event of reproaches by the Client or Affected Persons or counterparties linked to relevant assets or in the event the assets (may) trigger reproaches against the Bank, and/or other GROUP Entities made in public, vis-à-vis the media or vis-à-vis authorities in Luxembourg and abroad,

as well as, together with other GROUP Entities in Luxembourg and abroad

- to identify and manage conflicts of interest that may arise in the course of day-to-day business between various business lines of the Bank and its clients, for which purpose Data and/or Client Information is shared with GROUP Entities in Luxembourg and abroad, in particular in connection with financing, capital market transactions and M&A advisory mandates of corporate clients; and
- to create research reports and similar documents that include an evaluation of the Client and in this context to disclose the client relationship to avoid any conflicts of interest based on laws, regulations or industry standards.

Other recipients of Personal Data

Other recipients of Personal Data and/or Client Information can be any units for which You have released us from professional secrecy by means of **a separate consent**.

Extract from the Client Information Booklet

Appendix 4

Additional Data Protection Information Relating to the Branches of CREDIT SUISSE (LUXEMBOURG) S.A.

Preamble

The Data Protection Information issued by the Bank including the Appendix 3 (“**List of Data Recipients**”) (“**Data Protection Information**”) applies accordingly, with the deviations referred to below, to Personal Data processing operations relating to the Client and other Affected Persons, as the case may be, conducted in the context of a business relationship between the Client and a respective Branch of the Bank (“**Branch Client Relationship**”):

Credit Suisse (Luxembourg) S.A., Succursale en France
86 Boulevard Haussmann
CS 40047
75008 Paris France
Phone: +33 (0)1 70 39 00 00,
Fax: +33 (0)1 70 39 04 30
(hereinafter referred to as “the **France Branch**”),

Credit Suisse (Luxembourg) S.A., Sucursal em Portugal
Avenida da Liberdade, n.º 180-A, 8.º andar
1250-146 Lisboa Portugal
Phone: +351 21 310 92 10,
Fax: +351 21 310 92 11
(hereinafter referred to as “the **Portugal Branch**”),

Credit Suisse (Luxembourg) S.A., Ireland Branch
Kilmore House, Park Lane, Spencer Dock
Dublin 1
Republic of Ireland
Phone: +353 1 523 5913
(hereinafter referred to as “the **Ireland Branch**”),

hereinafter referred to as “**Branch(es) (of the Bank)**”.

The variations set herein are as follows:

1. In the context of the Branch Client Relationship, on the basis of the established service provisioning model whereby services are provided jointly by the respective Branch responsible for the overall relationship management and the Bank, in particular, for the maintenance and management of Client accounts, **the respective Branch and the Bank** will act as **joint data controllers** in relation to the Client's or any Affected Person's (as the case may be) Personal Data processed in the context of such Branch Client Relationship.
2. This Appendix 4 forms an **integral part** of the Data Protection Information.
3. All references to "legal" or "statutory" obligations included in the Data Protection Information and Appendix 3 shall be deemed to include all legal, regulatory and/or statutory obligations to which the respective Branch is subject under the laws or regulations of the relevant jurisdiction.
4. The Branches will transfer, disclose or share Personal Data relating to the Branch Client Relationship to/with the Bank on a need-to-know basis. For details regarding **Data Recipients** outside the Bank and the Branches, please see the Appendix 3 ("**List of Data Recipients**").
5. Personal Data will be processed by the respective Branch of the Bank for as long as it necessary for the purposes described in section 3 of the Data Protection Information. In addition to the obligation to preserve records the Bank is subject to, as described in section 7 of the Data Protection Information, the Branches of the Bank may be subject to the Data **retention requirements** applicable in **the respective jurisdictions**, and the Branches of the Bank need to comply with obligations to preserve records according to **local civil, commercial and tax laws**, as well as **financial sector laws and regulations**:
 - The **France Branch**: In line with respective provisions in the French Civil Code and the French Commercial Code, in general the France Branch keeps Client and Affected Persons' Personal Data for a time period of maximum 10 years upon termination of the business relationship. However, in some limited situations, as per specific French Civil Code provisions, in case of postponement of the applicable statute of limitations, suspension, or interruption of such statute of limitations, a maximum period of 20 years period applies, starting from the date when the right was born.
 - The **Portugal Branch**: Portuguese commercial and tax legislation in general set the obligation to maintain records for the purposes of accounting, administration and tax management for a period of 10 years. This relates to Client and Affected Persons' Personal Data upon termination of the business relationship. Other deviating minimum and maximum retention periods can apply.
 - The **Ireland Branch**: There is an obligation to maintain records for a period of not less than 5 years after the date on which the Ireland Branch ceases to provide services to the Client or the date of the last transaction with the Client (if any), whichever is the later. Other deviating legal obligations may apply, which might require the Ireland Branch to keep records for a longer period of time.

The fact that **legal holds** can be faced which might trigger a requirement to keep records for a longer period of time, as explained in section 7 of the Data Protection Information, may also apply to **the respective Branch** in the context of Branch Client Relationship.

6.

In order to exercise the **data subjects rights** described in section 8 of the Data Protection Information, You may reach out to contact persons listed in the Data Protection Information. In addition, You have a right to lodge a complaint with the **respective Data Protection Authority:**

- In **Portugal** – the *Comissão Nacional de Protecção de Dados (CNPd)*,
<https://www.cnpd.pt>
- In **France** – the *Commission Nationale de l'Informatique et des Liberté (CNIL)*,
<https://www.cnil.fr>
- In **Ireland** – the *Data Protection Commissioner*,
<https://www.dataprotection.ie>

or the data protection authority of Your country of residence (if within the European Union).



CREDIT SUISSE (LUXEMBOURG) S.A.

Registered office: 5, rue Jean Monnet, L-2180 Luxembourg

R.C.S. Luxembourg B 11756

Contact:

Postal address: P.O. Box 40, L-2010 Luxembourg

Phone: +352 46 00 11-1

Fax: +352 46 32 70

Version: October 2023

<http://www.credit-suisse.com>

Important Information

This document has been produced by CREDIT SUISSE (LUXEMBOURG) S.A. ("Credit Suisse") with the utmost of care and for information purposes only. This document and the information provided therein are for the exclusive use of the intended recipient. This document does not constitute or contain an offer or invitation to enter into any type of financial transaction.

Neither this information nor copies of it may be sent to, taken into, or distributed in the United States or distributed to any US person (within the meaning of Regulation S of the US Securities Act of 1933 in its applicable form). This document may not be reproduced, either in part or in full, without the written permission of Credit Suisse.

Copyright © CREDIT SUISSE (LUXEMBOURG) S.A. All rights reserved.