

Data Protection Information



The following data protection information gives an overview of our collection and processing of your data.

Duties of disclosure upon collection of personal data from the data subject in accordance with the Dubai International Financial Centre (DIFC) Data Protection Law 2020.

Data privacy is important - please read the statement below.

CREDIT SUISSE AG (DIFC Branch) has issued this Data Privacy Statement in light of the newly enacted DIFC Data Protection Law 2020, Law No. 5 of 2020 (**DIFC DP Law**).

We therefore kindly ask you to familiarise yourself with the data protection information found below.

With the following information, we would like to give you an overview of how we will collect and process your data and of your rights according to the DIFC DP Law. The details on what data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

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

The legal entity responsible is:
Credit Suisse AG (DIFC Branch)
9th floor, the Gate Building, East Wing
Dubai International Financial Centre

If you have any questions about this Data Privacy Statement, or our processing of your personal data, please contact us -

(1) by mail at:

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

or

(2) by E-mail at:

data.protection@credit-suisse.com

2. What sources & data do we use?

We collect and otherwise process personal data relating to clients, prospective clients and any other person(s) involved in the business relationship, as the case may be, such as authorised representative(s), person(s) holding a power of attorney, beneficial owners and controlling persons. In connection with a product or service provided to our clients, we may also collect information about their dependents or family members. If different from the client, we refer to each such person as an "Affected Person".

We also process - insofar as necessary to provide our services - personal data that we obtain from publicly accessible sources (e.g. press, sanctions lists, internet) or that is legitimately transferred to us by other companies in the Credit Suisse group or from other third parties (e.g. a credit ratings agency, exchanges, and other similar entities. Also third party service providers such as professional advisers, insurers, dependants or family members).

Clients, before providing Credit Suisse with personal data relating to the Affected Persons, should provide a copy of this notice to those individuals.

Relevant personal data is the personal information of a client or Affected Person (e.g. name, address, contact details, date and place of birth, and nationality) or any information referring to such person. It can also include:

- Identification data and authentication data (e.g. passports, social security numbers, sample signature, photographs)
- Data relating to current and past professional roles and employment, and education (e.g. corporate title, membership of professional associations or bodies, career histories, knowledge and experience in investment matters, qualifications and skills)
- Data relating to criminal convictions and offences
- Data related to designation as a politically exposed person (PEP)
- Data arising from fulfilment of our contractual obligations (e.g. orders or payment transactions)
- Information about a client's or an Affected Person's financial situation (e.g. creditworthiness data, scoring/rating data, origin of assets, source of wealth)

- Data from interactions with us (our branches, our internet websites, our apps, our social media pages, meetings, calls, chats, emails, interviews and phone conversations) together with documentation data (e.g. file notes or meeting minutes from a consultation)
- Marital status, name of spouse, number of children
- Marketing and sales data
- Dietary and access requirements (e.g. for event organization purposes)
- Video surveillance and telephone/ audio recordings
- Data relating to habits and preferences
- Health information
- Other data similar to the categories mentioned above.

3. What do we process your data for (purpose of processing) & on what Legal Basis?

We process personal data in accordance with the DIFC DP Law.

a. For fulfilment of contractual obligations (Art. 10(1) Para (b))

Data is processed in order to provide banking and financial services in accordance with our legal agreements with our clients or to carry out pre-contractual measures that occur as part of a request from you.

The purposes of data processing are primarily in compliance with the specific product or service (e.g. bank account, credit, securities) and can include needs assessments, advice, discretionary management, asset management and support, as well as carrying out transactions.

Any Special Categories of Personal Data (as defined in the DIFC DP Law), such as health data or criminal records, will be processed in line with the additional obligations for such personal data under the DIFC DP Law.

b. In the context of legitimate interests (Art. 10(1) Para (f))

Where required, we process your data beyond the actual fulfilment of the contract where such processing is necessary for the purposes of the legitimate interests pursued by us or a relevant authorised third party provided such interests are not overridden by the rights or interests of you or an Affected Person. Examples include:

- Consulting with credit rating agencies to investigate creditworthiness and credit risks
- Reviewing and optimising procedures for needs assessments for the purpose of direct client discussions
- Marketing (whether direct marketing or any other form of marketing) or market and opinion research (which may include profiling), unless you have objected to the use of your data for this purpose
- Obtaining personal data from publicly available sources for client acquisition purposes
- Measures for business management and further development of services and products
- Risk control in Credit Suisse
- Asserting legal claims and a defence in legal disputes
- Guarantee of Credit Suisse Group's IT security and IT operation
- Prevention and investigation of crimes
- 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).

c. As a result of your consent (Art. 10(1) Para (a))

As long as you have granted us consent in accordance with the DIFC DP Law to process your personal data for certain purposes (e.g. analysis of trading activities for marketing purposes or an invitation to an event), this processing is legal on the basis of your consent. Consent given can be withdrawn at any time by notifying us using either of the contact methods set out under the heading "Who is responsible for data processing & how can I contact them?" above, and does not affect the legality of data processed prior to withdrawal.

d. Where necessary for compliance with Applicable Law (Art. 10(1) Para (c))

We are authorised and regulated by the Dubai Financial Services Authority ("DFSA") for the conduct of Financial Services in and from the DIFC with DFSA reference number F000011.

As a financial services firm, we are subject to various legal obligations under the applicable laws (e.g. money laundering, terrorist financing or other financial services laws, regulations, rules, DIFC Law No. 1 of 2004, the Financial Services and Markets Act 2000, MIFID and any tax or sanctions laws, regime, treaty or directive). The purposes of processing include assessment of creditworthiness, identity and age checks, fraud and money laundering prevention, fulfilling control and reporting obligations under financial regulation, and measuring and managing risks within the Credit Suisse group.

4. Who receives my personal data?

The following paragraphs set out details of where we transfer client personal data to and the purpose for any such transfer.

a. Credit Suisse Group

We will share your personal data with other entities in the Credit Suisse group, including outside of the DIFC. We will transfer your personal data to achieve the purposes described in section 3. We may also pass on information about you to any other members of the Credit Suisse group in connection with any services that we think you may be interested in. Where we share your personal data with entities outside of the DIFC, we will do so in accordance with the DIFC DP Law: please see section 5 below for further detail.

b. External recipients of data

We will transfer personal data about you in the course of conducting our usual business, or if legal, regulatory or market practice requirements demand it to the following external recipients, or if you have given your consent (e.g. to process a transaction you have ordered us to fulfill):

- To public entities and institutions (e.g. authorities such as the Dubai Financial Services Authority, the Central Bank of the UAE, the DIFC Registrar of Companies, the UK's Prudential Regulation Authority, the UK's Financial Conduct Authority, other supervisory authorities and law enforcement agencies) either made at the reasonable request of a regulator, police or other government agency or competent authority or as part of our legislative and regulatory reporting requirements or other obligations to which we are subject
- To other credit and financial service institutions or comparable institutions in order to carry out a contractual business relationship that is in your interest (depending on the contract, e.g. correspondent banks, custodian banks, brokers, stock exchanges, credit rating agencies)
- To third parties (for example correspondent banks, brokers, exchanges, trade repositories, processing units and third-party custodians, issuers, authorities, and their representatives) for the purpose of ensuring that we can meet the requirements of applicable law and regulation and relevant contractual provisions, as well as market practices and compliance standards in connection with transactions you enter into and the services that we provide you with

- To a natural or legal person, public authority, agency or body for which you have given us your explicit consent to transfer personal data for one or more specified purposes.

c. To service providers and agents

We will transfer your personal data to service providers and agents appointed by us for the purposes given, subject to maintaining banking confidentiality. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing.

We will at all times implement appropriate organisational and technical safeguards to protect the personal data for which we act as data controller.

5. Will data be transferred to a Third Country or an International Organisation?

Data transfers to legal entities outside the DIFC and jurisdictions with data protection legislation deemed adequate or equivalent by the Commissioner¹ (together known as "third countries") takes place so long as:

- The third country has been determined by the Commissioner as a jurisdiction providing adequate level of protection under the DIFC DP Law;
- Where applicable, we have provided appropriate or suitable safeguards under the DIFC DP Law and enforceable data subject rights and effective legal remedies for data subjects are available;
- One of the specific derogations in the DIFC DP Law (Article 27(3)) applies (including, but not limited to, where you have explicitly consented to the proposed transfer in accordance with the DIFC DP Law); or
- The limited circumstances set out in the DIFC DP Law (Article 27(4)) apply.

You understand that the data protection legislation outside the DIFC may not give you as much protection as the data protection legislation inside the DIFC.

Please contact us if you would like to request to see a copy of the specific safeguards applied to the export of your information.

6. For how long will my data be stored?

We will process and store clients' and Affected Persons' personal data for as long as it is lawful for us to do so.

We will normally retain your records for a minimum of six years from, for example, the time the client relationship comes to an end, to comply with regulatory and contractual requirements unless there is a particular reason to hold the records for longer, including legal hold requirements², which require us to keep records for an undefined period of time.

¹ Commissioner means the DIFC Commissioner of Data Protection.

² A legal hold is a process that an organisation uses to preserve all forms of relevant information when litigation is reasonably anticipated.

7. What data privacy rights do I have?

In relation to your personal data, and to the extent permitted under the DIFC DP Law, you have the right:

- To request access to your personal data according to Article 33 of the DIFC DP Law
- To request the rectification of inaccurate or incomplete personal data according to Article 33 of the DIFC DP Law
- To request erasure of your personal data according to Article 33 of the DIFC DP Law
- To request the restriction of the processing of your personal data according to Article 35 of the DIFC DP Law
- To data portability according to Article 37 of the DIFC DP Law
- Where applicable, the right to object to decisions based solely on automated processing including profiling - according to Article 38 of the DIFC DP Law
- The right to non- discrimination if you exercise any rights under the DIFC DP Law - according to Article 39 of the DIFC DP Law.

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

- On reasonable grounds relating to your particular situation, the processing of your personal data for the reasons set out in section 3b (in the context of legitimate interests) of this statement (including profiling for these purposes), to the extent permitted under the DIFC DP Law
- The processing of your personal data for direct marketing purposes, and profiling to the extent related to direct marketing
- Your personal data being disclosed to third parties as set out in section 4 or used on their behalf for the purposes of direct marketing.

According to Article 32 of the DIFC DP Law, you may also withdraw consent granted to us for the processing of your personal data at any time. Please also see section 3c of this statement for further details on consent.

Any requests in relation to exercising your data privacy rights do not need to be made in a particular form however, it should be addressed to us using either of the contact methods set out under the heading "Who is responsible for data processing & how can I contact them?" above.

If applicable, you also have a right to make a complaint to the Commissioner.

8. Am I Obligated to Provide Data?

In the context of our relationship, you must provide all personal data that is required for accepting and carrying out a business relationship and fulfilling the accompanying contractual obligations or that we are legally obliged to collect. Without this data, we are, in principle, not in a position to enter into a legal agreement with you to provide banking and financial services.

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 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 applicable anti-money laundering regulations, and to immediately disclose any changes over the course of our 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. 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. If we use this procedure in individual cases, we will inform you of this separately, provided it is a legal requirement to inform you. You have a right to object in certain instances where a decision is taken by us based only on automated decision-making and to require such decision to be reviewed manually.

10. 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 in the following ways:

- Due to legal and regulatory requirements, we are required to combat money laundering, terrorism financing, fraud, and assess risk and offences that pose a danger to assets
- Data assessments (including on payment transactions) are also carried out for these purposes. At the same time, these measures also serve to protect you
- Assessing credit worthiness in relation to provision of lending products
- We use assessment tools in order to be able to specifically notify you and advise you regarding products. These allow communications and marketing to be tailored as needed, including market and opinion research.

11. Do you collect Biometric Data?

Biometric data is classified as coming within the special categories of personal data under the DIFC DP Law. Therefore, your explicit consent will be required in a separate process to use your Touch ID or other biometric identification to access certain applications.