

# Data Privacy Policy

**Duties of disclosure upon collection of personal data from the data subject in accordance with the Kingdom of Bahrain's Personal Data Protection Law (PDPL).**

Data privacy is important – please read the statement below.

CREDIT SUISSE AG, Bahrain Branch has issued below the Privacy Statement in light of the new Law No. 30 of 2018 promulgating the Personal Data Protection Law (PDPL) of the Kingdom of Bahrain.

We therefore kindly ask you to familiarize yourself with the Data Protection Information found below.

# Data Privacy Policy

## **The following data protection information gives an overview of the collection and processing of your data.**

With the following information, we would like to give you an overview of how we will process your data and of your rights according to data privacy laws. The details on what data will be processed and which method will be used depend significantly on the nature of the business relationship.

### **1. Who Is Responsible For Data Processing & How Can I Contact Them?**

The legal entity responsible is:

Credit Suisse AG, Bahrain Branch, Bahrain World Trade Center, East Tower, 22nd Floor, King Faisal Highway, Manama 316, Kingdom of Bahrain.

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

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

### **2. What Sources & Data Do We Use?**

We process personal data that we obtain from our current, prospective and former clients in the context of our current, possible or former business relationship. We also process - insofar as necessary to provide our services - personal data that we obtain with permission from publicly accessible sources (e.g. the Ministry of Industry, Commerce and Tourism, press, internet) or that is legitimately transferred to us by other companies in the UBS Group<sup>1</sup> or from other third parties (e.g. a credit ratings agency).

In order to facilitate, enable and/or maintain our business relationship, we collect and otherwise process personal

data relating to 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 and beneficial owners, if different from the client, each an "Affected Person".

Relevant personal data is the personal information of a client or Affected Person (name, address and other contact details, date and place of birth, and nationality), identification data and authentication data (e.g. sample signature). Furthermore, this can also be order data (e.g. payment instructions), data from the fulfillment of our contractual obligations (e.g. data in 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), marketing and sales data, documentation data (e.g. file notes or meeting minutes from a consultation), and other data similar to the categories mentioned.

### **3. What Do We Process Your Data for (Purpose of Processing) & On What Legal Basis?**

We process personal data in accordance with the provisions of the Personal Data Protection Law (PDPL).

#### **a. For fulfillment of contractual obligations (Art. 4 Para 1)**

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 an interested party.

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. You can find other details about the purposes of data processing in the Credit Suisse AG, Bahrain Branch Investment Advisory Agreement and related legal documentation.

#### **b. In the context of balancing interests (Art. 4 Para 5)**

Where required, we process your data beyond the actual fulfillment of the contract for the purposes of the legitimate interests pursued by us or a third party.

Examples:

- Consulting with credit rating agencies to investigate creditworthiness and credit risks.
- Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions.
- Marketing (whether direct marketing or any other form of marketing) or market and opinion research, unless you have objected to the use of your data.
- Obtaining personal data from publicly available sources for client acquisition purposes.
- Measures for business management and further development of services and products.
- Risk control.
- Asserting legal claims and a defence in legal disputes.
- Guarantee of 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).
- Mergers, acquisitions and re-

<sup>1</sup> As a result of the acquisition of Credit Suisse Group by UBS Group, all entities of Credit Suisse Group have become UBS

Group entities. Accordingly, the references to "Credit Suisse Group" (and similar references, e.g. "Credit Suisse entities",

"affiliates", etc.) also include the UBS Group entities

Credit Suisse AG, Bahrain Branch  
organizations including by providing  
information to future purchasers or  
transferees.



### **c. As a result of your consent (Arts. 4 and 24)**

As long as you have granted us consent to process your personal data for certain purposes (e.g. analysis of trading activities for marketing purposes), this processing is legal on the basis of your consent. Consent given can be withdrawn at any time.

This also applies to withdrawing your consent that was given to us before the PDPL comes into force, i.e. before August 1, 2019. Withdrawal of consent does not affect the legality of data processed prior to withdrawal.

### **d. Due to statutory provisions (Art. 4 Para 3)**

As such we are subject to various legal obligations, meaning statutory requirements (e.g. the Bahrain Anti Money Laundering Law No 4 of 2001 and Ministerial Order No. 23 of 2002, the Central Bank of Bahrain and Financial Institutions Law 2006 and any tax laws). We are an investment business firm and are authorised by the Ministry of Industry, Commerce and Tourism and the Central Bank of Bahrain and regulated by the Central Bank of Bahrain for the conduct of investment business in the Kingdom of Bahrain, with commercial registration number 70092-1. 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 UBS Group.

### **4. Who Receives My Data & Confidentiality Requirements?**

We are under a duty of confidentiality to our clients and to prospective clients and are obliged to maintain confidentiality regarding all client-related matters and assessments of which we acquire knowledge (confidentiality pursuant to Credit Suisse AG, Bahrain Branch Investment Advisory Agreement).

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

#### **a. The UBS Group**

We will share your personal data with other entities in the UBS Group where required to fulfill our contractual and legal obligations. We will transfer your personal

data in connection with any services offered by any other member of the UBS Group or for risk control due to statutory or regulatory obligation. We may also pass on information about you to any other members of the UBS Group in connection with any services which we think you may be interested in.

#### **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 financial transaction you have ordered us to fulfill) for the following purposes:

- To public entities and institutions (e.g. financial authorities such as the Central Bank of Bahrain, the Ministry of Industry, Commerce and Tourism, and law enforcement agencies) either upon providing a legal or regulatory request or as part of our legislative and regulatory reporting requirements.
- To credit and financial service institutions or comparable institutions or other third parties (for example correspondent banks, brokers, exchanges, trade repositories, processing units and third-party custodians, issuers, authorities, credit rating agencies, and their representatives) for the purpose of conducting a business relationship with you, as well as ensuring that we can meet the requirements of applicable law, contractual provisions, 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 consent to transfer personal data to or for which you have released us from banking confidentiality.

#### **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, for example, banking services, IT services, logistics, printing services, telecommunications, collection, advice

and consulting, and sales and marketing.

Credit Suisse AG, Bahrain Branch, will implement appropriate organizational and technical safeguards to protect the personal data for which it acts as data controller at all times.

### **5. Will Data Be Transferred to a Third Country or an International Organization?**

Data transfers to legal entities in states outside the Kingdom of Bahrain (known as third countries) takes place so long as:

- It is necessary for the purpose of carrying out your orders (e.g. payment and securities orders).
- It is required by law (e.g. reporting obligations under financial regulation).
- If the data to be transferred has been extracted from a register that was created by law for the purpose of providing information to the public.
- It is authorized by the Personal Data Protection Authority.
- Or you have granted us your consent.

For the avoidance of doubt, but without limitation, any such disclosure may include the transfer of data for the purpose of storage / warehousing appropriate information within a single jurisdiction in order to co-ordinate the services of the UBS Group.

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

### **6. For How Long Will My Data Be Stored?**

We will process and store your personal data for as long as it is necessary in order to fulfill our contractual, regulatory and statutory obligations. It should be noted here that our business relationship is a long-term obligation, which is set up on the basis of periods of years.

We will assess and respond to requests to delete data. We will delete data provided that the data is no longer required in order to fulfill contractual, regulatory or statutory

obligations, or the fulfillment of any obligations to preserve records according to commercial and tax law.

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

## 7. What data privacy rights do I have?

Every data subject has in relation to their personal data:

- The right to be notified of the processing - according to Article 18 of the PDPL.
- The right to rectification - according to Article 23 of the PDPL.
- The right to erasure - according to Article 23 of the PDPL.
- The right to block - according to Article 23 of the PDPL.
- The right to object to processing for direct marketing purposes - according to Article 20 of the PDPL.
- The right to object to processing that causes harm to you or others - according to Article 21 of the PDPL.
- The right to object to processing based on automated processing – according to Article 22 of the PDPL.

If applicable, you also have a right to make a complaint to the Personal Data Protection Authority.

You can withdraw consent granted to us for the processing of your personal data at any time. This also applies to withdrawing consent that was made to us before 1 August 2019 when the PDPL comes into force.

Please note that the withdrawal only applies going forwards, it does not have retrospective effect. Processing that was carried out before the withdrawal was notified is not affected by it.

## 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 this is a legal requirement. You have a right to object in instances where a decision is taken by us based only on automated decision making (see below).

## 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, 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 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. We May Collect Biometric Data From You

- Biometric data is classified as sensitive personal data under the PDPL. Therefore your explicit consent will be required in a separate process to use your Touch ID or other biometric identification to access certain applications.

## 12. Changes to this privacy statement

- This Privacy Statement was last updated in June 2023. We may need to make further changes to this Privacy Statement in the future. If we do, we will post updates to our website.

# Data Privacy Policy

## Information on Your Rights of Objection as a Data Subject

### 1. Right to Object to Data Processing for Direct Marketing Purposes (Art. 20)

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 the purpose of this type of marketing at any time. This also applies to profiling, insofar as it is in direct connection with such direct marketing.

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

### 2. Right to Object to Data Processing that Causes Harm Or Distress (Art.21)

You have the right to object to the processing of your personal data for a specific purpose or in a specified manner, in either of the following two instances:

- If the processing for such purpose or in that manner causes substantial and unwarranted harm or distress to you or others
- If there are reasonable grounds to believe it is likely that the processing for such purpose or in that manner will cause substantial and unwarranted harm or distress to you or others

The right to object may not apply where you have agreed to the processing or where the processing is necessary for one of the grounds for lawful processing stipulated in the PDPL.

If you submit an objection, you will need to give reasons and evidence to support the objection.

If you object to processing by us for a specific purpose or in a specified manner, we may not be able to provide services and maintain a business relationship.

### 3. Right to Object to Decisions Made Based on Automatic Processing (Article 22)

In instances where a decision is taken by us based only on automated processing of your personal data to evaluate you (e.g. your financial position; your qualification for borrowing; your behavior or your trustworthiness) you have the right to request that another evaluation method be adopted that does not rely on automatic processing.

### 4. Individual Right of Objection

On grounds relating to your particular situation, you shall have the right of objection to processing of your personal data at any time, in line with Article 4 paragraph 5 of the PDPL (data processing based on balancing interests).

If you submit an objection, we will no longer process your personal data unless we can give evidence of mandatory, legitimate reasons for processing, which outweigh your interests, rights, and freedoms, or processing serves the enforcement, exercise, or defence of interests.

Please note, that in such cases we will not be able to provide services and maintain a business relationship.

The objection does not need to be made in a particular form however, it should be addressed to:

Credit Suisse AG, Bahrain Branch,  
Bahrain World Trade Center, East Tower,  
22nd Floor, King Faisal Highway,  
Manama 316, Kingdom of Bahrain

E-mail:

[bahrain.data-protection@credit-suisse.com](mailto:bahrain.data-protection@credit-suisse.com)

