

# Data Protection Statement

## Recruitment Candidates

The following data protection information gives an overview of our collection and processing of your personal data and your rights in accordance with data privacy laws.

### Duties of disclosure upon collection of personal data in accordance with Data Protection Legislation.

Data privacy is important – please read this document carefully. By continuing with your application you are consenting to the following privacy terms (“**Data Protection Statement**”).

“**UBS Group**” refers to UBS Group AG and its affiliates and/or subsidiaries. As a result of the merger of Credit Suisse Group AG into UBS Group AG, Credit Suisse Group entities have become part of the UBS Group.

“**We**”, “**us**” and “**our**” refer to the former Credit Suisse Group entities and establishments that are responsible for the processing of your data.

“**You**” and “**your**” refer to candidates applying for job positions at former Credit Suisse Group entities and establishments.

“**Data Protection Legislation**” means any law and/or regulation (including guidance issued by authorized data protection regulators) globally which is applicable where relevant 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”), the Swiss Federal Act on Data Protection, the UK GDPR and the Philippines Data Privacy Act of 2012 and its implementing rules and regulations and issuances of the National Privacy Commission (all as may be amended, extended, consolidated or re-enacted from time to time).

### Associated regional Privacy Statements

- If you are a California resident, please also refer to the Privacy Notice for the California Consumer Privacy Act (“CCPA”) which is available at <https://www.credit-suisse.com/careers/en.html>
- If you are applying for a position with us in Australia, please also refer to the Australian Privacy and Credit Reporting Policy which is available at <https://www.credit-suisse.com/au/en/legal/credit-suisse-australia-privacy-and-credit-reporting-policy.html>.

# 1. What sources and data do we use?

## a. Data from you:

We process personal data about you that we obtain directly from you in the context of the sourcing of candidates and/or the recruitment process. Because we are a regulated Bank, in compliance with our internal policies, information may be collected about you indirectly, such as monitoring of telephone calls, emails, and other methods of communication.

## b. Data from other sources:

We also process personal data about you that we obtain from other sources, in particular:

- Previous employers (for instance for the purpose of background screening to confirm statements from a candidate's CV, such as education or experience);
- Data/information relating to any previous employment or contractual work arrangement with us, including disciplinary measures or misconduct warranting registration. This will be shared and processed as described in this Data Protection Statement and in the event of a successful application, for purposes in connection with the conduct of the new employment relationship, as well as any subsequent employment relationships within us or external appointees, in Switzerland and abroad, on a need-to-know basis;
- Headhunters, recruitment agencies or other sources of candidate referrals;
- Publicly available social media and professional networks, where and to the extent permitted in certain countries;
- Within India only, student career databases provided by schools and universities; and
- Other publicly available sources.

## c. Types of personal data:

The types of personal data we process may include:

- Personal details such as names, telephone numbers, addresses, email addresses, date and place of birth, marital status, family details, household composition and gender;
- Identification details, such as digital signatures, passport ID, Work Visa status, photos and National IDs (e.g. National Insurance Number or Identity Card IDs);
- CV and professional biography data, such as employment and education history, professional qualifications, educational certificates, references, general professional experience and interests/hobbies;
- Candidate rating, such as internal notes on role suitability or interview feedback;
- Assessments to assess your skill set and company fit;
- Specific relationships or positions, such as your status or history as, or relationship with, government officials, or relationship with a Director, Officer or Senior Employee of our clients;
- Video recordings, such as following your participation in a video interview;
- Photographs, video recordings or other recordings associated with attendance at recruitment events hosted by us;
- Background check prior to starting employment where legally permissible and in acknowledgment of your consent, such as employment references, educational qualifications, criminal record checks, credit history and debt collection register information;
- Right to work details, such as work authorisations and permits;
- Financial information, such as tax information provided by you or which have otherwise been legally obtained; and
- Other data similar to the broad categories mentioned above.

## d. Types of sensitive data:

- To the extent permitted by the Data Protection Legislation, other applicable laws and/or local regulations, we may process sensitive data provided by you that may relate to criminal records (for example, for background check purposes), as well as certain protected characteristics about you (for example, race/ethnicity, sexual orientation and gender identity) for the purpose of compliance with our legal and regulatory obligations, or to further support and enhance our corporate social responsibilities (for example, diversity and inclusion goals) which may be aggregated into non-identifiable statistics and shared internally and externally. Additionally, biometric (see Section 10 below) and health information (for example, in the context of public health or drug screening results collected during the background check process) may also be processed.

## 2. What do we process your data for (purpose of processing) and on what legal basis?

We process your personal data for one of the following reasons in the context of external recruitment, internal mobility opportunities, and the conduct of your future employment relationships within the UBS Group globally.

### a. As a result of your consent

In many data protection regimes, we use consent as a legal basis for processing. Your acknowledgment of this Data Privacy Statement serves as the necessary consent for us to process your personal data as described in this Data Privacy Statement. You can withdraw your consent at any time by contacting the Data Protection Office (see section 12). Withdrawal of consent does not affect the legality of data processing carried out prior to withdrawal.

Your personal data may be processed (in compliance with applicable law) in the jurisdiction(s) where you apply for a position or others, for talent pooling and recruitment and for the following purposes:

- To confirm references, verify educational background, employment history, compensation, and any other information submitted by you;
- To source and hire candidates, support background screening or the on-boarding process;
- For inclusion in a global talent database and in other employment-related databases which are either hosted internally or externally;
- In connection with the conduct of the employment relationship with us, including any subsequent applications or employment relationships within the UBS Group globally;
- To assess your suitability for a particular position or for purposes related to subsequent applications or vacancies and contact you using the contact details that you have provided. This may include verbal, numerical or logical reasoning assessments; and
- To reproduce and distribute statements, picture, image, voice, recording or other likeness, as well as your name and participation in a recruitment event you may attend, internally within the UBS Group or to post these on social media sites/the Internet, free of charge, without any limitation as to time and place of use.

### b. Due to legal obligations

As a financial institution we are subject to various legal obligations, meaning statutory requirements and obligations. Purposes for which we need to process personal data in this context include, but are not limited to, identity checks, fraud and money laundering prevention, prevention of market abuse and fulfilling control and reporting obligations.

### c. For purposes of legitimate interests

We may process your personal data for the purposes of our legitimate business interest and other interests (including reasons of substantial public interest), in:

- Protecting our business and the integrity of the financial markets;
- Complying with legal and regulatory obligations and cooperating with regulatory, judicial and other authorities and bodies around the world;
- Managing our business, including satisfying recruitment, management reporting and administration requirements; and
- Monitoring compliance with or reporting on equality of opportunity or treatment.

### d. Processing of sensitive / special category / criminal personal data

To the extent permitted by the Data Protection Legislation, other applicable laws and/or local regulations, we may process the above personal data on the basis of explicit consent or for reasons relating to, for example, substantial public interest, equality of opportunity or treatment, public health, in the field of employment and social security and social protection and/or for protection of vital interests. Where appropriate, data is collected on a voluntary

basis.

### 3. Who receives my data?

The following paragraphs set out details of the recipients or categories of recipients to which we transfer your personal data.

**a. The UBS group**

Your personal data is processed by authorized HR personnel and hiring managers. Due to our international cross-border and cross-legal entity management structure your personal data can also be accessed by managers that are based in locations other than the country in which your potential employing legal entity is located. For efficiency purposes, UBS Group has centralized functions such as HR, IT and Compliance. Such functions may access or otherwise process your personal data from abroad. Should you be hired, any information that is retained as part of the employment relationship shall be processed for the purposes, and as described above in section 2, cross-border and across legal entities.

**b. External recipients of data**

For the purposes described in Section 2, and for the purposes of obtaining feedback from you on the recruitment process and/or internal mobility process for future system improvement, your personal data may be shared with and processed, in both electronic and physical form, by external third parties providing services to us including:

- Recruitment outsourcing;
- Background screening;
- Candidate application tracking;
- Event management (which may include associated social media / internet advertising);
- Skills assessment;
- Candidate relationship management;
- Travel, such as relevant hotels and transportation providers where travel or accommodation is arranged by us in relation to the recruitment process;
- Online and in-person assessment (such as verbal reasoning);
- Work permit and visa verification;
- Video recording, such as supporting video interviews and other IT systems and hosting providers;
- Digital signatures, in situations where candidates are asked to sign a document online;
- Professional advisory services;
- IT and infrastructure services; and
- Other recruitment related services similar to the broad categories mentioned above.

We may also disclose and transfer your personal data to:

- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger/acquisition of all or part of our business or assets or any associated rights or interests; and
- Other third parties pursuant to a court order or request or demand of any governmental authority or regulator or as required by law or regulation.

Granting access of your personal data to a data recipient outside of the UBS Group is always preceded by our third party risk management assessment of the third party and the legitimacy and security of data sharing. Personal data is subject to appropriate technical and operational data security measures, as well as the execution of service agreements that include data protection and confidentiality provisions.

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

The UBS Group operates globally. Your personal data may be accessed, transferred or otherwise processed by our personnel or third parties in a country outside the jurisdiction where you apply

for a position.

Please note that in certain jurisdictions, your personal data may not necessarily be subject to the same or similar level of data protection as is mandated in the jurisdiction where you apply for a position.

Whenever we share personal data cross-border, in particular to locations not offering an adequate level of data protection, we impose appropriate contractual obligations and standards imposed to meet internal standards and requirements enumerated under applicable Data Protection Legislation.

## 5. For how long will my data be stored?

UBS Group and their third parties will typically retain your personal data for the durations shown below. This is the period of time following your application or following the date of the last recruitment activity between you and us:

- Americas employing entities – 10 years;
- Switzerland, APAC and EMEA employing entities (excluding Italy and Spain) – 2 Years; and
- Italy and Spain – 1 year.

In certain cases, special retention obligations may apply due to e.g. regulatory requirements and/or pending or foreseeable litigation, in which case personal data may be kept longer.

## 6. What data privacy rights do I 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 as processed by us;
- Request the rectification of inaccurate or incomplete personal data;
- Request deletion of your personal data;
- Request restriction of the processing of your personal data;
- Data portability;
- Object to the processing of your personal data for direct marketing purposes, and profiling to the extent related to direct marketing; and
- Object to the processing of your personal data for the reasons set out in section 2c of this statement (including profiling for these purposes), to the extent permitted under the Data Protection Legislation.

To exercise any of the above rights, or request withdrawal of your previous consent, you do not need to use a particular form but you should email, or write to our Data Protection Officer in accordance with section 12 of this Data Protection Statement. We will then assess and respond to your request to exercise your rights.

Please also contact us if you have any other questions or concerns such as relating to the way that we collect and use your personal information, or you do not want us to contact you, or you wish to make a complaint in relation to the use of your personal data.

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

## 7. Am I obliged to provide data?

The provision of your personal information to us is voluntary. However, if you do not provide all or part of the information requested by us, it may not be possible to proceed with any recruitment

activity.

## 8. 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, if such separate notice is legally required.

## 9. Will profiling take place?

We process some of your data automatically, with the goal of assessing certain personal aspects (profiling) for instance in relation to fraud prevention. Additionally for certain roles we may conduct verbal, numerical or logical reasoning assessments - this is not an automatic profiling process however.

## 10. We may collect biometric data from you

Biometric data is classified as sensitive personal data under the Data Protection Legislation. Therefore your explicit consent will be required in a separate process, for example to use your Touch ID or other biometric identification to access certain applications. Additionally for candidates within the United States we collect your fingerprints for background screening purposes.

## 11. Changes to this Data Protection Statement

Changes may need to be made to this Data Protection Statement in the future. If we do make changes, we will post updates to our website.

## 12. Who is responsible for data processing and how can I contact them?

You can reach our Credit Suisse Group Data Protection Officer at:

Credit Suisse Services AG, London Branch  
Credit Suisse Group Data Protection Officer  
One Cabot Square  
London  
E14 4QJ  
United Kingdom  
E-mail: [data.protection@credit-suisse.com](mailto:data.protection@credit-suisse.com)