

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 Data Protection Legislation.

Data privacy is important – please read the statement below.

CREDIT SUISSE (UK) LIMITED has issued this Privacy Statement in light of the enactment of the Data Protection Legislation.

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

“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 UK Data Protection Act, the EU General Data Protection Regulation (2016 / 679) (“GDPR”) and the Swiss Federal Act on Data Protection,

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

The legal entity responsible is:
Credit Suisse (UK) Limited
Five Cabot Square
London E14 4QR

You can reach our privacy officer at:
Credit Suisse Group Data Protection Officer
One Cabot Square
London E14 4QJ
United Kingdom

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

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."

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 and beneficial owners. 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, each an "Affected Person".

We also process - insofar as necessary to provide our services - personal data that we obtain from publicly accessible sources (e.g. HM Land Registry, Companies House, 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 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). 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 from fulfillment 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 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.

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

We process personal data in accordance with the Data Protection Legislation.

a. For fulfillment of contractual obligations

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.

In line with FCA guidelines, sensitive data (such as health data or data relating to children is processed in order to protect vulnerable clients, or criminal data for financial crime prevention).

You can find other details about the purposes of data processing in the Credit Suisse (UK) Limited Private Banking Terms of Business and related legal documentation.

b. In the context of legitimate interests

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 include:

- Consulting with credit rating agencies to investigate creditworthiness and credit risks
- Reviewing and optimising procedures for needs assessment for the purpose of direct client discussions
- Marketing or market and opinion research (which may include profiling), 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 in Credit Suisse
- Asserting legal claims and a defense 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).
- Mergers, acquisitions and re-organizations including by providing information to future purchasers or transferees

c. As a result of your consent

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 or an invitation to an event), this processing is legal on the basis of your consent. Consent given can be withdrawn at any time and does not affect the legality of data processed prior to withdrawal.

d. Due to statutory and / or regulatory provisions

We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority for the conduct of investment business in the United Kingdom, with firm reference number 124269.

As a financial services firm, Credit Suisse is subject to various legal obligations (e.g. the Money Laundering Regulations, the Financial Services and Markets Act 2000, MIFID and any tax laws). 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 UK and European Union. 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.

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. financial authorities such as the Bank of England, Prudential Regulation Authority, Financial Conduct Authority, and law enforcement agencies) either upon providing a legal or regulatory request or as part of our legislative and regulatory reporting requirements
- To other credit and financial service institutions or comparable institutions in order to carry out a business relationship with you (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, 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 banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing.

Credit Suisse (UK) Limited will implement appropriate organisational 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 Organisation?

Data transfers to legal entities outside the UK, European Union and states with Data Protection Legislation deemed adequate or equivalent by the European Commission (together known as "third countries") takes place so long as:

- It is necessary for the purpose of carrying out your orders (e.g. payment orders)
- It is required by law (e.g. reporting obligations under financial regulation)
- To fulfil our legitimate interests (as described in section 3b) or
- You have granted us your consent.

You understand that the Data Protection Legislation outside the UK or European Union may not give you as much protection as the Data Protection Legislation inside the UK or European Union.

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 or rely upon legal derogations to meet internal Credit Suisse standards and requirements enumerated under applicable Data Protection Legislation.

Please contact our Data Protection Officer 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 ten 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 requirements¹, which require us to keep records for an undefined period of time.

7. 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
- 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 3b (in the context of legitimate interests) of this statement (including profiling for these purposes), to the extent permitted under the Data Protection Legislation.

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:

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

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

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

¹ A legal hold is a process that an organisation uses to preserve all forms of relevant information when litigation is reasonably anticipated.

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 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.

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 moneylaundering, 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 this purpose. 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 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.

12. Information for residents of California

Further information can be found online in our California Consumer Privacy Act Annual Notice Supplement for clients of Credit Suisse resident 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

© Copyright 2020 CREDIT SUISSE GROUP and/or its affiliates. All rights reserved.