

# UBS EXTERNAL AND THIRD-PARTY STAFF PRIVACY NOTICE - BRAZIL

## DATA PROTECTION UNDER THE BRAZIL PERSONAL DATA PROTECTION LAW (LEI GERAL DE PROTEÇÃO DE DADOS)

To run our business, UBS processes information about individuals (“**Personal Data**”), including information about external staff, which includes employees and contractors of our suppliers, as well as staff of independent financial intermediaries (“**you**” or “**External and Third-Party Staff**”).

UBS takes your privacy seriously. This Privacy Notice (“**Notice**”) contains information on what Personal Data the UBS entities in Brazil referred to in Section 10 (“**UBS**”, “**we**”, “**our**”, or “**us**”) and other companies of the group to which we belong (the “**UBS Group**”) collect(s), what we do with that information, and what rights you have.

As part of our commitment to protect your Personal Data we want to inform you in a transparent manner:

- why and how UBS collects, uses and stores your Personal Data;
- the lawful basis for the use of your Personal Data; and
- what your rights are in relation to such processing and how you can exercise them.

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### 1 What does this Notice cover?

This Notice applies to any and all forms of use of Personal Data (“**processing**”) by UBS in relation to External and Third-Party Staff in Brazil.

### 2 What type of Personal Data do we collect?

#### 2.1 Personal Data collected for all External and Third-Party Staff

We collect basic identification information, such as your name, title, position, professional history, experience, language skills and contact details. Such information will be collected if provided to us by your employer, or in some cases directly from you, for instance on a CV you have prepared, even if you do not ultimately work on an assignment for UBS.

#### 2.2 Additional Personal Data collected for External and Third-Party Staff working on UBS premises

For External and Third-Party Staff working on UBS premises, we usually also collect (to the extent permitted by applicable law):

- Detailed identification information (e.g., address, office location, business telephone number, date and place of birth, picture, emergency contact details, ID card, passport details and other national ID numbers as required);

- Detailed professional information (e.g., academic, professional and industry qualifications and certifications (including dates), directorship information, contact details of references, previous employment dates, rank or seniority, line manager contact information, working arrangements (such as full or part time), assignment allocation and absence information);
- Electronic identification data (e.g., login information, access rights, badge number, IP address, online identifiers/cookies, logs and connection time, sound or image recording such as CCTV or voice recordings);
- Personal and physical characteristics (e.g., gender, date of birth, immigration status, and physical characteristics);
- Information submitted in support of an application to work for UBS on behalf of your employer (e.g., and anything you choose to submit in support of your or your employer's application).

Where relevant and to the extent permitted by applicable law, the Personal Data that we collect will also include sensitive Personal Data such as data on racial or ethnic origin, political opinion, health (for instance to allow UBS to make appropriate adjustments to your working environment as a result of a disability), biometric data, and data about alleged or proven criminal offences in each case where permitted by law.

In some cases, the Personal Data we collect from you is needed to meet our legal or regulatory obligations, to perform our obligations under UBS's contract with your employer (UBS's supplier), or to enter into that contract. If so, we will indicate to you that the provision of this information is mandatory, and the consequences if we cannot collect this information.

### 2.3 Additional Personal Data collected for staff of financial intermediaries

For staff of financial intermediaries, we also collect Personal Data relating to:

- personal details and identification (ID, photo, signature, password) physical and electronic address (domicile, email address, telephone number); birth and family related information (birth date, nationality, birthplace);
- professional profile (CV / career details, employment, qualifications, reference letters and information about previous employment relationship with entities of the UBS Group, such as whether there have been any disciplinary measures recorded);
- online identity (IP address, device ID, user ID);
- voice recordings (communication record and voice recording for compliance reasons);
- public registry (national identifiers) or any publicly available information about criminal convictions / offences data and search results of internal UBS databases.

The abovementioned Personal Data in sections 2.1 - 2.3 are collected from information that you or your employer directly provide and, in some cases, UBS will also collect Personal Data indirectly from background check providers, and other administration services providers, or from publicly available sources such as LinkedIn profiles.

## 3 For which purpose do we process your Personal Data and what legal basis do we rely on?

### 3.1 Purposes of processing

We always process your Personal Data for a specific purpose and only process the Personal Data which is relevant to achieve that purpose. In particular, we process your Personal Data for the purposes below and thereby take into account the role in which you are active with UBS.

- a) Selection:
  - determine the suitability of your qualifications;
  - to prepare for and enter into a contract with our supplier or with financial intermediaries.
- b) Onboarding:
  - to set up internal profiles, collect information required to complete the onboarding process. For background checks please see section e) below;

- to assist us in managing External and Third-Party Staff providers such as your employer (see section 5 for further information about when we work with service providers).
- c) Staff Administration:
- to administer, plan and manage our personnel, suppliers and contractors (including task management and internal workforce analysis and planning);
  - to allocate costs, optimize performance and enhance quality;
  - to where relevant, manage and make available Personal Data within the UBS Group;
  - to carry out supplier performance reviews, satisfaction surveys and other contractor surveys;
  - to track staff' interaction with internal email communication (including newsletters, interest groups and messages)
  - to enable delivery of more relevant personalized content for improved readership and engagement.
- d) Training, development and other staff offerings:
- to train our External and Third-Party Staff;
  - to carry out development initiatives and coaching activities;
  - to inform you of internal events, leisure activities, and corporate sponsored discounts through approved third-party providers.
- e) Compliance & Risk Management and / or Crime Prevention, Detection & Investigation:
- to check for any existing or potential conflicts of interest or any other restrictions which may otherwise restrict or prevent a prospective engagement on a matter with UBS;
  - to carry out initial and periodic vetting checks and ongoing due diligence, where relevant;
  - to receive and handle complaints, requests or reports from employees or third parties made to a compliance function, HR function, or other designated units within UBS or the UBS Group;
  - to track relevant incidents related to our External and Third-Party Staff and / or persons they might have a connection with, in order to comply with legal or regulatory obligations, internal policies or for risk management purposes;
  - to monitor and investigate electronic communications in order to be able to comply with legal or regulatory obligations, including compliance with banking regulations and internal policies or for risk management purposes;
  - to track and record data accesses, to evaluate them and to scan data carriers as well as to evaluate the accessing or storage of data with the objective of ascertaining whether there has been a breach of the obligation to be task-related;
  - to conduct internal investigations in line with UBS policies and/or as required by applicable legislation;
  - to reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority.
- f) Supporting, Enhancing and Maintaining UBS's technology:
- to provide for a centralized, global approach to the provision of IT services to and enable our External and Third Party Staff within the UBS group to interact with one another and UBS employees. This normally involves the hosting of your contact and e-mail information to allow UBS's global IT network to be established and populated with relevant details;
  - to manage our IT resources, including infrastructure management and business continuity.

g) Other purposes:

- to exercise our duties and/or rights vis-à-vis you or third parties;
- to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of UBS's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- to offer our products and services to our customers (e.g., we may communicate professional contact details of one of our employees to a customer or supplier, indicating that this person is the contact person within the UBS organization);
- to collect data to ensure the security of buildings as well as property and information located or stored on the premises, to prevent, and, if necessary, investigate unauthorized physical access to secure premises (e.g., maintaining building access logs and CCTV system images).

### 3.2 Basis for the processing of Personal Data

Depending on the purpose of the processing activity (see section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary for taking steps to enter into or executing a contract, or for carrying out our obligations under such a contract;
- necessary to comply with our legal or regulatory obligations, such as tax reporting or reference requirements;
- necessary for the protection of your life or physical security or of another natural person, such as providing disability access to places of work where applicable;
- necessary for the legitimate interests of UBS, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is necessary for the intended purpose (See below for more examples of legitimate interests of UBS);
- necessary for the regular exercise of our rights in judicial, administrative or arbitration proceedings; or
- in some cases, and as may be requested from you from time to time, we have obtained prior consent (for instance where required by law), or processed with your explicit consent in the case of sensitive Personal Data (such as your health data).

Examples of the "legitimate interests" referred to above are processing necessary:

- to benefit from cost-effective services, efficient solutions and subject-matter expertise (e.g., we may opt to use certain IT platforms offered by suppliers, or share basic Personal Data with another UBS entity if you transfer to that entity, for use by that UBS entity in conducting legally required background checks without collecting the information from you again (the UBS entity's use of that data will be notified to you at the time). We may also share Personal Data with another UBS entity so that a team with the appropriate subject-matter expertise can provide advice or support);
- to offer our products and services to our customers (e.g., we may communicate professional contact details of one of our External and Third-Party Staff to a customer or supplier, indicating that this person is the contact person within the UBS organization);
- to prevent fraud or criminal activity, misuses of our products, resources or services as well as the security of our premises, information, IT systems, architecture and networks;
- to provide for a centralized, global approach to the provision of IT services to our staff and enable staff within the UBS group to interact with one another. This normally involves the hosting of your contact and e-mail information to allow UBS's global IT network to be established and populated with relevant details;
- to monitor, investigate and ensure compliance with internal UBS policies, relevant laws or regulations;

- to cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority.

To the extent that we process any sensitive Personal Data relating to you, we will do so because:

- the processing is necessary for our regular exercise of rights, including in judicial, administrative or arbitration proceedings;
- the processing is necessary for the protection of your life or physical security or of another natural person;
- the processing is necessary for the prevention of fraud and your safety, in processes of identification and authentication of registration in electronic systems, provided that your fundamental rights and liberties requiring protection of your Personal Data do not prevail; or
- you have given your specific consent to us to process that information (where legally permissible).

#### **4 How do we protect Personal Data?**

All personnel accessing Personal Data must comply with the internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality. UBS and the UBS Group have also implemented adequate technical and organizational measures to protect your Personal Data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

#### **5 Who has access to Personal Data and with whom are they shared?**

##### **5.1 Within the UBS Group**

We make available Personal Data to members of our personnel and within the UBS Group for the purposes indicated in section 3.1. Other companies of the UBS Group may process your Personal Data on behalf and upon request of UBS.

##### **5.2 Outside UBS and the UBS Group**

###### **5.2.1 Third Parties**

We share Personal Data with other credit and financial services institutions and comparable institutions (including brokers, exchanges, upstream withholding agents; swap or trade repositories, stock exchanges, central securities depositories), our professional advisers and consultants (e.g., lawyers, tax accountants or labour consultants) or clients as part of you working on tasks related to or involving those parties.

###### **5.2.2 Service Providers**

In some instances, we also share Personal Data with our suppliers, who are contractually bound to confidentiality, such as IT system or hosting providers, payroll providers, cloud service providers, database providers, training, education and development providers and third parties who carry out vetting checks, and other goods and services providers (such as communication service providers). When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure. Service providers are thereby mandated to comply with a list of technical and organisational security measures, irrespective of their location, including measures relating to: (i) information security management; (ii) information security risk assessment and (iii) information security measures (e.g., physical controls; logical access controls; malware and hacking protection; data encryption measures; backup and recovery management measures).

###### **5.2.3 Public or regulatory authorities**

If required from time to time, we disclose Personal Data to public authorities, regulators or governmental bodies, courts or party to proceedings where we are required to disclose information by applicable law or regulation, under a code of practice or conduct, at their request, or to safeguard our legitimate interests.

#### **5.2.4 Other**

- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of UBS's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- Any legitimate recipient required by applicable laws or regulations.

#### **5.3 Data Transfer to other Countries**

The Personal Data transferred within or outside UBS and the UBS Group as set out in sections 5.1 and 5.2, is in some cases also processed in other countries. We only transfer your Personal Data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission to the extent recognized by the competent Data Protection Authority or another statutory exemption) provided by local applicable law.

You may request additional information in this respect and obtain a copy of the relevant safeguard by contacting the Group Data Protection Office at [dpo-americas@ubs.com](mailto:dpo-americas@ubs.com).

A list of the countries in which UBS and the UBS Group operate can be found at <https://www.ubs.com/global/en/our-firm/locations.html>.

### **6 How long do we store your data?**

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirement. In general, your Personal Data will be kept in our systems during your engagement with UBS for up to 10 years from the day that the contractual relationship between your employer and with UBS terminates. There may be exceptions to this general rule, for example:

- a) Personal Data that is no longer required or has become obsolete may be destroyed while the External and Third-Party Staff relationship is still ongoing for proportionality reasons;
- b) In certain cases, UBS may store and process Personal Data for a longer period than 10 years, in particular for compliance or risk management purposes, to comply with (other) legal and regulatory requirements, or if it is in UBS' legitimate interest.

If you were previously or are currently a Credit Suisse External and Third-Party Staff: Your information after your transition to UBS will be stored as per above. However, your information prior to your transition to UBS and/or any activities performed under the Credit Suisse entities, will continue to be stored as per the applicable Credit Suisse retention requirements until the full integration of systems and processes into UBS are completed.

However, if you wish to have your Personal Data removed from our databases, you can make a request as described in section 7 below, which we will review as set out therein.

### **7 What are your rights and how can you exercise them?**

#### **7.1 Your rights**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data.

You also have the right to:

- request anonymization, blocking or elimination of unnecessary or excessive Personal Data, or of data that is not processed in compliance with LGPD;
- request the erasure of your Personal Data based upon consent;
- request the disclosure of sub-processors and other parties with whom Personal Data is shared;

- request information about consent choices and the consequences of refusing consent where UBS seeks to rely on your consent as a lawful ground for processing your Personal Data; and
- withdraw your consent where UBS obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

UBS will honor such requests, withdrawal or objection as required under applicable data protection rules, but these rights are not absolute: they do not always apply, and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

In certain circumstances UBS may process your Personal Data through automated decision-making. Where this takes place, you will be informed of such automated decision-making that uses your Personal Data and be given information on criteria and procedures applied. You can request an explanation about automated decision making carried out and that a natural person reviews the related decision where such a decision is exclusively based on such processing.

## 7.2 Exercising your rights

To exercise the above rights, and request consultation free of charge, please send an email to [sh-hr-data-requests-snow@ubs.com](mailto:sh-hr-data-requests-snow@ubs.com).

If you are not satisfied with how UBS processes your Personal Data, please let us know and we will investigate your concern. Please raise any concerns by contacting the Group Data Protection Office at [dpo-americas@ubs.com](mailto:dpo-americas@ubs.com).

If you are not satisfied with UBS's response, you have the right to make a complaint to the National Data Protection Authority ("ANPD").

## 8 Changes to Personal Data

In the interest of keeping Personal Data properly up to date and accurate, we will ask you periodically to review and confirm the Personal Data we hold about you and/or to inform us of any change in relation to your Personal Data (such as a change of address).

## 9 Updates to this Notice

This Notice was updated in March 2024. We reserve the right to amend it from time to time. Any amendment or update to this Notice we will make available to you [here](#). Please visit the UBS website frequently to understand the current Notice, as the terms of this Notice are closely related to you.

## 10 List of contracting UBS entities covered by this Notice

Entity Name	Registered Address
UBS BB Serviços de Assessoria Financeira e Participações S.A.	Brigadeiro Faria Lima Avenue, 4440 – 9 <sup>th</sup> floor, Itaim Bibi, São Paulo, 04538-132
UBS Brasil Administradora de Valores Mobiliarios Ltda	Brigadeiro Faria Lima Avenue, 4440 – 9 <sup>th</sup> floor, Itaim Bibi, São Paulo, 04538-132
UBS Brasil Corretora de Câmbio, Títulos e Valores Mobiliários S.A.	Brigadeiro Faria Lima Avenue, 4440 – 7 <sup>th</sup> floor, Itaim Bibi, São Paulo, 04538-132
Credit Suisse Hedging-Griffo Corretora de Valores S.A.	Leopoldo Couto de Magalhães Jr. Street, 700 – 10 <sup>th</sup> to 14 <sup>th</sup> floors (parts), Itaim Bibi, São Paulo, 04542-000
Credit Suisse Hedging-Griffo Wealth Management S.A.	Leopoldo Couto de Magalhães Jr. Street, 700 – 10 <sup>th</sup> to 14 <sup>th</sup> floors (parts), Itaim Bibi, São Paulo, 04542-000
Banco de Investimentos Credit Suisse (Brasil) S.A.	Leopoldo Couto de Magalhães Jr. Street, 700 – 10 <sup>th</sup> to 14 <sup>th</sup> floors (parts), Itaim Bibi, São Paulo, 04542-000

Banco Credit Suisse (Brasil) S.A.	Leopoldo Couto de Magalhães Jr. Street, 700 – 10 <sup>th</sup> to 14 <sup>th</sup> floors (parts), Itaim Bibi, São Paulo, 04542-000
Credit Suisse (Brasil) S.A. Corretora de Títulos e Valores Mobiliários	Leopoldo Couto de Magalhães Jr. Street, 700 – 10 <sup>th</sup> to 14 <sup>th</sup> floors (parts), Itaim Bibi, São Paulo, 04542-000

If you have any questions or comments about this Notice, please contact the Group Data Protection Office at the following email address: [dpo-americas@ubs.com](mailto:dpo-americas@ubs.com). For additional information please visit [goto/groupdpo](https://go.ubs.com/groupdpo).