

# REAL ESTATE MANAGEMENT PRIVACY NOTICE UBS FUND MANAGEMENT (SWITZERLAND) AG

## DATA PROTECTION UNDER THE SWISS DATA PROTECTION LAW

To run our business, UBS processes information about natural and legal persons (“**Personal Data**”), including information about persons involved in the management of real estate by UBS (“**you**”).

UBS takes your privacy seriously. This Privacy Notice (“**Notice**”) contains information on what Personal Data the UBS entities listed in Section 10 (“**UBS**”, “**we**”, “**our**”, or “**us**”) collect, 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.

Table of Content	
1 What does this Notice cover?	7 What are your rights and how can you exercise them?
2 What types of Personal Data do we collect?	8 Changes to your Personal Data
3 For which purpose do we process your Personal Data and what legal basis do we rely on?	9 Updates to this Notice
4 How do we protect Personal Data?	10 List of UBS entities covered by this Notice
5 Who has access to Personal Data and with whom are they shared?	11 EU Representative for UBS Fund Management (Switzerland) AG
6 How long do we store your data?	

### 1 What does this Notice cover?

This Notice applies to any and all forms of use (“**processing**”) of Personal Data by us if you are a tenant, real estate agent, real estate marketer, architect, real estate planner, intermediary, buyer, seller, or any other person involved in the management of real estate by any of the UBS entities listed in Section 10.

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

In the context of our real estate management activities, we collect and process the following personal information:

- Personal details & identification (title, name, gender, language, signature photo, nationality, membership of associations and political interest groups);
- Birth and family details (birth date, legal capacity, marital status, name of spouse / partner / children);
- Public registry information (e.g. vehicle registration, company register, property register);
- Physical and electronic address data (address, email, phone number, social Network IDs, residency verification);
- Internal identifiers (IBAN, account number);

- Client financial information (salary information, bankruptcy/insolvency information, insurance related details, credit rating, tax statement, tax ID codes);
- Criminal information (criminal records extract, search results);
- Political information (Politically Exposed Person screening);
- any information regarding the ongoing real estate business (i.e. complaints from neighbours, records of damages caused by the tenant).

We receive your personal data from property managers, from you in the context of your application process for real estate rentals / purchase and from public registers or other third-party and public sources, such as wealth screening services, credit reference agencies and fraud prevention agencies. Without receiving your Personal Data we may not be able to proceed with doing business with you.

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

#### **3.1 Purposes of processing**

We collect and process your Personal Data to provide services to you and ensuring their proper execution, complaint handling, insurance or legal case processing or when buying or selling property and for the purpose of compliance and risk management, specifically to carry out legal and regulatory compliance checks including to comply with anti-money laundering, fraud prevention, financial crime prevention and sanction regulations.

#### **3.2 Basis for processing of Personal Data**

UBS processes your Personal Data within the applicable legal framework. Where required and depending on the purpose of the processing activity, the processing of your Personal Data will be one of the following grounds:

- necessary for taking steps to enter into or executing a contract with you, or for carrying out our obligations under such a contract;
- required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks;
- in some cases, we have obtained your consent (for instance where required by law);
- in some cases, necessary for the performance of a task carried out in the public interest;
- where possible, when 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.

Where the Personal Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility, we may be unable to do business with you.

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

All UBS employees accessing Personal Data must comply with our internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality. The UBS Group have also implemented adequate technical and organisational measures to protect your Personal Data against unauthorised, 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 UBS Group**

We usually share Personal Data with other UBS Group companies, for the purposes indicated above, to ensure a consistently high service standard across our group. 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 Service Providers**

In some instances, we also share Personal Data with our suppliers, such as property managers and debt collection agents, who are contractually bound to confidentiality, such as IT hardware, software and outsourcing providers, logistics, mail, courier, printing services and storage providers, facility management companies and others. When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure.

Where UBS transfers your data to service providers processing data on UBS behalf, 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).

### **5.3 Data transfers to other countries**

The Personal Data transferred within or outside UBS and the UBS Group as set out above, 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 or another statutory exemption) provided by local applicable law.

A copy of these measures can be obtained by contacting the Group Data Protection Office. If and to the extent required by applicable law, we implement the necessary legal, operational and technical measure and/or enter into an agreement with you before such transfers.

## **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 requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on its purpose. In general, although there may be limited exceptions, data is kept for the time period defined in the UBS Records Management Policy.

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

### **7.1 Your rights**

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

### **7.2 Exercising your rights**

To exercise the above rights, please contact UBS Fund Management (Switzerland) AG via [FMCH@ubs.com](mailto:FMCH@ubs.com).

If you are not satisfied with UBS's response, you have the right to make a complaint to the Privacy Supervisory Authority of your jurisdiction.

## **8 Changes to your Personal Data**

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please inform us of the change as soon as possible.



## 9 Updates to this Notice

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 UBS entities covered by this Notice

Entity Name	Registered Address
UBS Fund Management (Switzerland) AG	Aeschenvorstadt 1, Basel, 4051, Switzerland

## 11 EU Representative

Where required, UBS designated the below UBS entity as the EU representative in compliance with Art. 27 EU GDPR

EU Representative Entity	Registered Address
UBS Europe SE	Bockenheimer Landstrasse 2-4, 60306 - Frankfurt am Main, Germany

If you have any questions or comments about this Notice, please contact the Group Data Protection Office at [dpo-ch@ubs.com](mailto:dpo-ch@ubs.com).