

# Privacy statement

# The following privacy statement will give you an overview of the collection and processing of your personal data

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With the following information, we would like to provide you with an overview of our processing of your personal data and your rights under Data Protection Legislation. Which data is individually processed and how it is used largely depends on the nature of the business relationship.

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

Data privacy is important – please read this document.

“**We**”, “**us**” and “**our**” as used in this statement refers to each and any of the UBS group.<sup>1</sup> entities and establishments listed (as the context requires) as responsible for data processing in section 12 of this statement. In certain situations, multiple UBS group entities can be independently responsible for data processing at the same time and/or in different jurisdictions (e.g. when you sign an agreement with several UBS group entities) and you may be provided with other privacy statements by other UBS group entities.

“**You**” and “**your**” as used in this statement refers to individuals:

- with whom we come into contact, or in respect of whom we obtain personal data, in the usual course of dealings with our current, prospective and former clients, our service providers, and our other business counterparties or transaction participants, which may include, without limitation, employees, directors, officers, beneficial owners and other personnel of such clients, service providers, business counterparties or transaction participants (each a “**Connected Individual**”), in all cases outside the UBS group (as applicable to you, “Your Organisation”); or
- who themselves are our clients.

“**Data Protection Legislation**” means any law and/or regulation (including guidance and codes of practice issued by authorized data protection regulators) in the countries where UBS group operates, which is applicable to the processing of your personal data by us, and which shall include, but is not limited to Israel Protection of Privacy Law 5741 (1981), Privacy Protection Regulations (Data Security) 5777 (2017), as well as EU General Data Protection Regulation (2016/ 679) (“GDPR”), and all relevant EU/EEA member states’ national legislation amending and/or supplementing the GDPR.

## **1. What sources and data do we use?**

### **Data from you:**

We process personal data about you that we obtain from you in the context of our current, possible or former business relationship with you and / or Your Organisation (as applicable). We do this in order to facilitate, enable and / or maintain that relationship and / or to provide services to our clients or for other reasons specified below. In addition, in carrying on our business relationship with you or Your Organisation, information may be collected about you indirectly from monitoring or other means (e.g. recording of telephone calls and monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance purposes.

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<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.

### **Data from other sources:**

We also process personal data about you that we obtain from publicly accessible sources (e.g. Companies House, press including trade press or paid for content, publicly available websites and other publicly available sources of information such as sanctions lists or lists of directors disqualifications). Additionally, we process personal data that is legitimately transferred to us by other companies in the UBS group<sup>1</sup> or from other third parties. These may include Your Organisation as well as third parties not related to you or Your Organisation, such as a credit ratings agency, settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities, databases, and third party service providers such as professional advisers, insurers and risk consulting firms.

**Personal data relating to a third party:** If you provide us with personal data relating to a third party, for example, your spouse, children, parents or a Connected Individual, you represent and warrant that you have obtained the separate consent of such third party (when required) before providing us with such personal data. You must ensure that you make such third parties and your Connected Individuals aware of our name, our contact information, and the scope of and purposes for which we will collect and process their personal data and how it will be processed as set out in this Privacy Statement.

### **Types of personal data:**

The types of personal data we process may include:

- personal details relating to you (name, date and place of birth, nationality, gender, domicile)
- contact details, including private and / or business phone numbers, postal and email addresses
- identification data such as passports, National Insurance or Social Security numbers, driving licence, ID cards, property register identification, social network user names, customer identifiers (CIF, IBAN / BIC), relationship identifiers (e.g. client segment and account currency), photographs
- authentication data such as sample signatures
- marital status, name of spouse, number of children (if applicable)
- tax status (e.g. tax ID)
- order data (e.g. payment data and account information)
- data from the fulfilment of our contractual obligations (e.g. orders or payment transactions)
- information about your financial situation (e.g. source of wealth, incomes, benefits, mortgage information, shareholdings)
- video surveillance and telephone / audio recordings
- data relating to criminal convictions and offences (including excerpts of criminal register)
- data related to designation of your status as a politically exposed person (PEP) and related information
- marketing and sales data (e.g. customer relationship documentation)
- data relating to your habits and preferences
- dietary and access requirements (e.g. for event organisation purposes)
- Health information
- data from your interactions with us, our branches, our internet websites, our apps, our social media pages, meetings, calls, chats, emails, interviews and phone conversations
- documentation data (e.g. file notes or meeting minutes from a consultation, client needs and product usage)
- data relating to your current and past professional roles and employment, and education (e.g. corporate title, membership of professional associations or bodies, career histories or biographies, job function, knowledge and experience in investment matters, qualifications and skills)
- other data similar to the broad categories mentioned above.

In addition, all of our websites use a standard technology called "cookies" to collect information about how our websites are used, which may include your personal data. The use of cookies is essential to the operation of our websites. You may opt-out of receiving cookies by disabling cookie support but doing so may prevent our websites from functioning properly and you may not be able to use

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<sup>1</sup> This includes all entities of UBS Group in Switzerland and abroad.

fully all of the available features and information. If you would like to know more about our policies in relation to the use of cookies and your online security, please refer to our Privacy & Cookie Policy available at <https://www.credit-suisse.com>.

## 2. **Why do we process your personal data (purpose of processing) and on what legal basis?**

In any place in this document where we refer to a legal basis, such legal basis shall apply to processing subject to the European Union General Data Protection Regulation and/or any similar legal regime which requires such legal bases.

We process personal data in accordance with the provisions of the Data Protection Legislation:

### **a. For the fulfillment of contractual obligations**

Data is processed to provide banking business and financial services as part of the execution of our contracts with you or for the execution of pre-contractual measures.

The purposes of data processing are based first and foremost on the specific product (e.g. account, credit, saving with building societies, securities, deposits, client referral) and may include, among other things, needs analyses, advice, asset management and support, as well as the execution of transactions. You can find further details on the data processing purposes in the relevant contract documents and terms and conditions.

### **b. In the context of balancing of interests**

If necessary, we process your data beyond the actual fulfillment of the contract to preserve our legitimate interests or those of a third party. Examples:

- Consultation and data exchange with data collection agencies (e.g. debt registers) to investigate creditworthiness and credit risks in the credit business and the need for a basic account or account maintained with a basic non-seizable balance;
- Review and optimization of procedures for needs analysis for the purpose of direct client contact;
- Advertising or market and opinion research, provided you have not objected to the use of your data);
- Assertion of legal claims and defense in case of legal disputes;
- Safeguarding of IT security and the IT operation;
- Prevention and investigation of criminal activity;
- Video surveillance to protect the right of owner of premises to keep out trespassers, for collecting evidence in hold-ups or fraud, or to prove availability and deposits e.g. at ATMs;
- Measures for building and system security (e.g. access controls);
- Measures for business management and further development of services and products;
- Risk control;
- Mergers, acquisitions and re-organizations including by providing information to future purchasers or transferees;

In addition, we obtain personal data from publicly available sources for client acquisition purposes.

### **c. Due to statutory provisions**

We are subject to various legal and regulatory obligations, including without limitation prudential and conduct regulation of banks and investment firms, as applicable, regulation of financial markets, compliance with any court orders, investor protection regulations, securities regulations, laws and administrative regulations/orders relating to money laundering, terrorism finance, sanctions and any tax laws. The purposes of processing may include:

- identity checks, fraud and financial crime and market abuse prevention or detection. If fraud is detected, Your Organisation, or individuals connected to it or you could be refused certain services, finance

- fulfilling control and reporting obligations under applicable financial regulations including securities regulations
- fulfilling requirements related to our licences and regulatory permissions
- complying with investor protection or conduct of business regulation (such as carrying out suitability or appropriateness assessments)
- complying with regulatory record keeping obligations
- complying with regulatory obligations in relation to measuring and managing risks within the UBS group.

#### **d. As a result of your consent**

There may be circumstances where we ask for your consent to process your personal data. The consent might be included in the client contractual documentation and covers the purposes of processing mentioned above and disclosure to entities mentioned below. As long as you have granted us this consent, this processing is legal on the basis of that consent. You can withdraw your consent at any time by contacting the Data Protection Officer (see section 12 below). Withdrawal of consent does not affect the legality of data processing carried out prior to withdrawal.

### **3. Am I obliged to provide my data?**

You are not obligated under law to provide us with the personal data that we will be processing. As part of our business relationship, you must provide the personal data necessary for the initiation and execution of a business relationship, as well as for the fulfillment of the associated contractual obligations, or that we are legally obliged to collect. Without this data, we will generally not be in a position to enter into or execute a contract with you.

In particular, we are obligated under anti-money laundering regulations to identify you prior to establishing a business relationship on the basis of your identity document and, in doing so, to collect and record your name, address, nationality, date of birth, place of birth, and ID information. To enable us to meet these statutory obligations, you must provide us with the necessary information and documents in accordance with the Anti-Money Laundering Act, and you must also immediately notify us of any changes over the course of the business relationship. If you do not provide us with the necessary information and documents, we are not allowed to enter into or continue the business relationship you desire.

### **4. Who receives my data?**

The following paragraphs set out details of where we transfer your data to and the purpose for any such transfer.

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

Certain UBS Group personnel will have access to your personal data, for the purposes described herein, including customer management, front office, back office, support functions, accounting, compliance and/or legal teams.

We will share or otherwise process your personal data with entities in the UBS group and in accordance with section 2 of this statement as applicable, for example:

- in connection with any services offered or provided by us or any other member of the UBS group
- to facilitate carrying on the business of the UBS group and providing services to clients on a global basis
- for risk control including internal approvals processes
- to warehouse appropriate information within a single jurisdiction in order to co-ordinate the services and business activities of the UBS group
- to pass on information about you to any members of the UBS group in connection with any

services which we think you or Your Organisation may be interested in in connection with financial or regulatory reporting purposes.

#### **b. External recipients of data**

We may transfer personal data about you (subject to Data Protection Legislation):

- to public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitral bodies, fraud prevention agencies)
- to other credit and financial service institutions or comparable institutions in order to carry on a business relationship with you or Your Organisation (depending on the contract, e.g. correspondent banks, custodian banks, brokers, securities exchanges, credit rating agencies)
- to third parties in connection with transactions that members of UBS group are involved in (e.g. correspondent banks, brokers, exchanges, central clearing counterparties, depositaries, trustees, trade repositories, processing units and third-party custodians, issuers, investors, prospective buyers and other transaction participants and their representatives)
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets to a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data to
- to professional advisors including law firms, accountants, auditors and tax advisors
- to insurers
- to suppliers (service providers and sub-contractors) and agents appointed by us for the purposes given. These are companies in the categories of IT services, logistics, printing services, telecommunications, advice and consulting, and sales and marketing and translation services, located in any jurisdiction.

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

In certain circumstances, we may transfer your data to another country. You understand that the data protection legislation in such other country may not give you as much protection as the data protection legislation in the country where you are located.

For transfers to third countries which have not been determined, by the authorised institutions, under the applicable Data Protection Legislation, as countries offering an adequate level of data protection, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you such as when making an international payment), or implement standard contractual clauses approved by the relevant authorised institutions, as applicable, to ensure the protection of your personal data.

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. Contact details are provided in Section 12 below.

#### **6. For how long will my data be stored?**

We only process and store your personal data for as long as is necessary for the fulfillment of our contractual and legal obligations. In this context, it should be noted that our business relationship is a continuing obligation that spans years. We will normally retain your records for a minimum of ten years from the end of our relationship

If the data is no longer required for the fulfillment of contractual or legal obligations, it is regularly deleted unless limited continued processing is necessary for the following purposes:

- Fulfillment of obligations to preserve records according to commercial and tax law.
- As a bank, we may also face legal holds<sup>1</sup> that require us to keep records for an undefined period of time.

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<sup>1</sup> A legal hold is a process that an organization uses to preserve all forms of relevant information when litigation is reasonably anticipated.

## 7. **What data protection 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 and a copy of your personal data
- request information on the processing of your personal data
- request the correction, completion or updating of inaccurate or incomplete personal data
- request the deletion of your personal data which are no longer needed
- data portability (when applicable)
- restrict processing (when applicable)
- object to processing (e.g. for direct marketing purposes)
- Any other rights as may be introduced by the Data Protection Legislation from time to time

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

Please note that some of the above rights are subject to limitations in some situations, and that the exercise of the above rights may affect our ability to continue a business relationship with you or Your Organisation.

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

You may also withdraw consent granted to us for the processing of your personal data at any time by contacting the Data Protection Officer (see Section 12). Please also see section 2.d of this privacy statement for further details on consent.

## 8. **To what extent does automated decision-making take place?**

To establish and execute a business relationship, we fundamentally do not use any fully automated decision-making. If we use this process in individual cases, we will inform you of this separately, provided this is legally required.

## 9. **For what purposes will profiling take place?**

We process your personal data automatically in certain instances, to evaluate certain personal aspects of you (profiling), for example:

- Due to legal or regulatory requirements, we are obligated to prevent money laundering, terrorist financing and asset-threatening criminal offenses. In doing so, data analyses (including in payment transactions) are carried out. These measures also serve to protect you;
- We use scoring as part of the assessment of your creditworthiness. In doing so, the probability that a client will meet their payment obligations pursuant to the contract is calculated. This calculation may be influenced by the client's earning capacity, expenses, pending liabilities, occupation, employer, term of employment, experience from the business relationship thus far, contractual repayment of previous credits, and information from credit information offices, for instance. Scoring is based on a mathematically and statistically recognized and established process. The calculated scores help us to make decisions in the context of product sales and are incorporated into ongoing risk management.
- To pursue marketing-related purposes.

## 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 to use your Touch ID or other biometric identification to access certain applications.

**11. 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.

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

The legal entity responsible for the processing of your personal data and contact details:

<b>Entity / Establishment</b>	<b>Contact Details</b>
Credit Suisse Financial Services (Israel) Ltd.	4 Berkowitz St. Museum Tower 6423806 Tel Aviv Israel

**You can reach our Data Protection Officer at:**

The Data Protection Officer  
One Cabot Square  
London  
E14 4QA  
United Kingdom

**or by e-mail as follows:**

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

**Important note:** when contacting our Data Protection Officer, please ensure that you specify the correct legal name of the entity or establishment to which your query relates.