



UNION BANCAIRE PRIVÉE

# Counterparties (including Prospective Counterparties) Privacy Notice

---

## 1. Introduction

Union Bancaire Privée, UBP S.A. (“**UBP**” or “**we**” or “**us**”) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as counterparties and/or prospective counterparties as to how we look after your personal data when we obtain it from you, your privacy rights and how the law protects you.

---

## 2. Purpose of this privacy notice

This privacy notice aims to give you information on how UBP collects and processes your personal data through the engagement process, including any data you may provide to us before becoming a client of or counter-party working with UBP.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of the personal information we collect about you; what we do with your information; and who your information may be shared with.

This privacy notice supplements the other notices and is not intended to override them.

---

## 3. Controller

UBP is the controller and responsible for your personal data.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights as explained in this notice, please contact the Data Protection Officer using the details set out below.

---

## 4. Contact details

**Mr. Constantin Bratsiotis**  
Group Data Protection Officer

Union Bancaire Privée, UBP SA  
Rue du Rhône 96-98 | P.O. Box | CH-1211 Geneva 1  
T +41 58 819 37 66

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the local data privacy authority so would ask that you please contact us in the first instance.

---

## 5. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect and process personal data about our Counterparties and prospective Counterparties (including suppliers, sub-contractors and individuals associated with such suppliers and sub-contractors) in order to engage, manage the relationship, contract to receive services from suppliers and, where relevant, to facilitate the provision of services as part of operating our business.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ◆ **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, passport photocopies.
- ◆ **Contact Data** includes work and business addresses, billing address, e-mail address and telephone numbers.
- ◆ **Financial Data** includes bank account and payment card details, financial status and history.
- ◆ **Professional Data** includes information about your business such as the company name and contact person.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

---

## 6. If you fail to provide personal data

Where we need to collect personal data by law, or for any of the purposes required during the engagement process when requested, we may not be able to complete the engagement process or enter into the contract we are trying to enter into with you.

---

## 7. How is your personal data collected?

Throughout the engagement process, we may use different methods to collect data from and about you including through:

- ◆ **Direct interactions.** You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

---

## 8. How we use your personal data

We will use the personal information we collect about you to:

- ◆ Facilitate the provision of outsourced services
- ◆ Assess your suitability as a client or potential counterparty to our business activities
- ◆ Carry out background checks and due diligence exercises to comply with our policies and legal obligations
- ◆ Assess if there are any potential risk factors posed by our prospective new relationship

- ◆ Communicate with you about the Engagement process
- ◆ Keep records related to the Engagement process
- ◆ Administer and manage our relationships with our counterparties

It is in our legitimate interests to assess your suitability as a client or counterparty as it is beneficial to our business to ensure any third-parties we do business with are suitable for the services we offer and do not pose potential risks to our business.

We will also be required to process your personal data in certain circumstances, listed above, to enable us to enter into and perform any contract we may have with you.

---

## 9. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *Contact us*.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

---

## 10. Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- ◆ Other entities within the UBP S.A. Group
- ◆ Regulatory authorities and agencies
- ◆ Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

---

## 11. International transfers

We may share your personal data within the UBP S.A. Group. This will involve transferring your data outside the European Economic Area (**EEA**), to countries in the UBP Group such as Switzerland, the Middle East and Asia (e.g. Singapore, Dubai and China).

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- ◆ We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- ◆ Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please *Contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

---

## 12. Data security

We have put in place appropriate security measures to protect and prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Personal data may be processed as part of the security monitoring we undertake, for example, automated scans to identify harmful emails, which involve detecting, investigating and resolving security threats. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

---

## 13. Data retention

### How long will you use my data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Personal Data may be held for longer periods where extended retention periods are required by law and in order to establish, exercise or defend our legal rights.

Details of retention periods for different aspects of your personal data are contained in our record keeping policies and are based on legal and regulatory requirements for retention periods.

---

## 14. Your legal rights

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- ◆ **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- ◆ **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- ◆ **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- ◆ **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- ◆ **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- ◆ **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing.