A. BANK-NOW LTD. PRIVACY POLICY FOR PROSPECTIVE CLIENTS, APPLICANTS, CLIENTS, BUSINESS PARTNERS AND THEIR EMPLOYEES, SERVICE PROVIDERS AND THEIR EMPLOYEES AND OTHER THIRD PARTIES (SWITZERLAND)

1. What is the purpose of this Privacy Policy?

The purpose of this Privacy Policy (**"Privacy Policy")** is to provide you, the prospective client, applicant or client, business partner, employees of our business partners, service providers, employees of the service providers and other third parties, with transparent information about our data processing activities and to inform you about our mutual rights and obligations in connection with data protection. We will inform you about what data we collect, process and store about you, why we process it, and with whom we share it. Furthermore, we will provide you with the information you need to exercise your rights under the applicable data protection legislation.

2. What is the scope of this Privacy Policy?

This Privacy Policy applies to all processing of your personal data as a prospective client, applicant, client, business partner, employees of our business partners, service providers, employees of the service providers and other third parties.

This Privacy Policy is intended to meet the requirements of the Swiss Data Protection Act (Datenschutzgesetz; "**DSG**").

Access to the public area of the website is subject to the separate Privacy Policy and terms of use of BANK-now Ltd. [www.bank-now.ch/en/privacy-statement-and-terms-conditions-website].

3. Who is responsible for data processing and who can you contact?

The following company is responsible for data processing in accordance with this Privacy Policy:

BANK-now Ltd.
Neugasse 18
8810 Horgen, Switzerland
datenschutz@bank-now.ch

If you have any questions about this Privacy Policy or about specific data processing activities, please contact us using the details given above.

In this Privacy Policy, the controller is referred to as "we" or "us".

4. From whom do we collect your personal data?

We collect, process and store personal data that we acquire from/about you as outlined below:

(a) Data that you disclose to us (e.g. in the context of a consultation by letter or email or via our websites, in particular via our application form). This also includes information about third parties or any client relationship connected with you (e.g. business partners, bodies or employees of a company, family members, partners, beneficial owners, controlling persons, beneficiaries or authorized representatives). Please ensure that you

disclose data about third parties to us only if you have informed the relevant persons in advance of the processing by making reference to this Privacy Policy.

(b) Data disclosed to us by persons in your environment (e.g. family members, employers, consultants, lawyers, grantors of power of attorney or representatives of heirs, heirs).

(c) Data disclosed to us by third parties for the purpose of following instructions or verifying and executing contracts, or that is disclosed with your consent (e.g. by the land registry, commercial register, or debt enforcement registry, by the Consumer Credit Information Office [IKO], by the Central Office for Credit Information [ZEK], by credit agencies, credit checkers or address traders, by card issuers, third-party banks or insurance companies, by media companies, anti-fraud agencies, pension funds or pension foundations).

(d) Data that becomes known to us as a result of your use of products or services or that is transmitted via the technical infrastructure (e.g. when visiting our website) or through processes involving the division of labor (e.g. in payment transactions, securities trading or when collaborating with other financial or IT service providers or marketplaces and exchanges).

(e) Data that is available in the public domain (e.g. on the internet, in the press, in public registers, or on social media).

(f) Data that is disclosed to us by domestic or foreign authorities, public bodies or courts.

(g) Data that is disclosed to us by collaboration partners or other contractual partners.

(h) Data disclosed to us by other UBS Group companies

5. What personal data do we process?

Which of your personal data we process, depends largely on the purposes for which the data is processed (see point 6). However, we only collect, process and store the data that we need for the purposes pursued. This data can be assigned to the following categories (not an exhaustive list):

(a) Master data (e.g. last name, first name, family or marital status, nationality, date of birth, address, phone number, email address, education, profession, personal interests, economic circumstances, family circumstances, other household information, any signatory powers).

(b) Identification and authentication data (e.g. ID card data, including the data of the residence permit, data from video identification, client or account number, login details, signature samples), plus data from other sound and image recordings (e.g. telephone calls or video recordings while on our premises).

(c) Communication data (e.g. data pertaining to you in written, telephone or electronic communication; including in particular also data that you disclose to us in any text field in online contact forms or other online input fields).

(d) Financial and financing data (e.g. scoring, rating and creditworthiness data in connection with lending, credit amount, date of payment, contract start and end dates, late payments, existence of payment protection insurance [PPI], information about your assets and their origin, savings objectives and budget data, portfolios and watchlists, liabilities, income, revenue and investments as well as data relating to your securities and

other financial instruments, your knowledge and experience in investment matters, investment products, risk and investment profile, investment objectives or information as required by foreign jurisdictions).

(e) Real estate data (e.g. address of location, property type, purchase price, market value, property size, fixtures, year of construction, condition, modernizations and other data relating to the examination and execution of financing and/or the brokerage of real estate).

(f) Pension data (e.g. details of pension accounts, planned retirement age, information on life and retirement insurance).

(g) Tax data (all relevant documents and information, in particular also details of denomination).

(h) Transaction data (e.g. payment transaction data, details of your payment order and of the payee or beneficiaries and the purpose of the payment, details of deposits and withdrawals made via ATMs).

(i) Contract and product data (e.g. details of the products and services you use, details of card limits and card usage, information about additional card or account holders, authorized representatives and other representatives, credit information, information about your account, safekeeping account or any contracts concluded and data relating to our other services).

(j) Documentation data or data pertaining to your contacts with third parties (e.g. minutes of consultations or other conversations, memos, references).

(k) Data relating to interactions and behavior plus data pertaining to your needs, preferences, and interests (e.g. details of your use of our products and services or website as well as details of your use of the services offered by our collaboration partners; details of your preferred contact and communication channels; based on the data relating to interactions and behavior: details of your preferences and interests in relation to certain products and services).

(l) Data about you that can be obtained in the public domain (e.g. data from the land registries and commercial register, data from the media and the press).

(m) Data relating to (potential) proceedings or investigations by authorities, public bodies, courts, organizations, or other entities.

(n) Data pertaining to compliance with legal requirements, such as anti-money laundering regulations or export restrictions.

(o) Where necessary and only to the extent permitted by law, data that enjoys special protection, such as biometric data, health data, data pertaining to political views or affiliations, religious or philosophical beliefs, information regarding criminal proceedings or convictions or details of social assistance measures.

(p) Technical data that can be associated with you (data collected when accessing our website or social media channels, i.e. data transmitted to us by your browser or end device [smartphone] and automatically recorded by our server, e.g. IP address, MAC addresses of electronic devices, details pertaining to these devices [e.g. brand, type, screen, memory] and their settings [e.g. language, keyboard], cookies, functions used, date,

time and duration of access, name of the file retrieved and content viewed, web browser, requested domain, orders placed or attempted, referring web pages and location information, client ID).

(q) Data that allows bundled invoicing of proprietary services and services from third parties (e.g. name, address, services procured and/or rendered and their value, insurance product, e.g. full comprehensive insurance or parking damage insurance, monthly insurance premium, policy no.).

6. For what purposes do we process personal data?

When we process your personal data (point 5), we always do so for one or more specific purposes. Potential purposes include the following:

(a) Reviewing, concluding, and executing contracts: We process your personal data so that we can provide our products and services to you. When granting loans in particular, credit risk assessments are also carried out. When bundling invoices for proprietary services and the services of third parties, we also process data in order to execute contracts that you have concluded with third parties.

(b) Compliance with applicable laws and ordinances as well as internal regulations: We are subject to legal and internal requirements (e.g. in connection with combating money laundering, misuse, and fraud) that require processing of your data and, where applicable, the data of third parties (e.g. beneficial owners or your partner).

(c) Referral of products and services from third parties: We process your personal data so that we can provide you with offers from our collaboration partners (e.g. term life insurance and pension insurance) should you be interested.

(d) Market research, product or system development and enhancement: We process your personal data in order to develop and enhance our infrastructure and, in particular, the products and services based on it, based on the collection and evaluation of your usage behavior (e.g. also in the context of using our website).

(e) Client care and marketing: We process your personal data for client care reasons (e.g. for the purpose of conducting contests and raffles as well as other events) and for marketing purposes. For example: Based on your interests and your usage behavior (in particular based on your inquiries, the products and services you acquire and your use of our website), we can send you tailored advertising and offers for our products and services and those of third parties (i.e. our collaboration partners) by post or electronically (e.g. via email, SMS). You can unsubscribe from tailored and general offers at any time by making a request in writing or by other means or by asking your Relationship Manager to take care of this for you.

(f) Communication: We process your personal data to communicate with you and with third parties so that we can provide you with information or send notifications and handle your requests. When you contact us by email/using the contact form, you give us authorization to respond to you via the same channel. Please note that unencrypted emails are transmitted openly via the internet and it is therefore not possible to guarantee that the content will not be viewed, accessed or manipulated by third parties. We therefore ask you not send us confidential information by email.

(g) Protection of our rights: We may process your personal data to assert claims out of court as well as in court before domestic and foreign authorities or to defend ourselves against claims.

(h) Business transactions and securitization: We may process your personal data to review, prepare, and execute the merger, purchase, or sale of companies or the refinancing or transfer of assets.

(i) Training and education: We may process your personal data for the purposes of conducting internal training and for the professional training and development of our employees.

(j) Other purposes: We may process your personal data for other purposes that are necessary to safeguard our legitimate interests.

7. To whom do we disclose your personal data?

Since our products and services are often provided based on a division of labor, your personal data (see point 5) is also processed by data processors and third parties. The data recipients are bound by legal and/or contractual requirements when processing your personal data. We would like to draw your attention in particular to the following data transfers:

(a) Data transfer to other UBS Group companies: For the processing, execution, and performance of the application and the contract, as well as for compliance and/or regulatory purposes, we may transfer your personal data to Group companies of UBS.

(b) Data transfer to IKO and ZEK for consumer credit agreements (credit and leasing): As part of our legal obligations, your personal data will be disclosed to the Consumer Credit Information Office (IKO). See www.iko.ch for further details. As part of our regulatory obligations, your personal data will be disclosed to the Central Office for Credit Information (ZEK), which may transfer the data to its members. See www.zek.ch for further details.

(c) Data transfer to intermediaries for consumer credit agreements (credit and leasing): If the application has been made to an intermediary, a data transfer to the respective intermediary is required for the collaboration. We may provide the intermediaries with information on the outcome of the application review, the content of the contract as well as the performance of the contract and send them all the contractual documents and enclosures. In addition, we may provide intermediaries with your personal data (e.g. first and last name, date of birth, nationality, family or marital status, other household information, client address, client number, order number [if any]), and financing data (e.g. credit amount, payment date, contract start and end dates, late payments, existence of payment protection insurance [PPI]).

(d) Data transfer to suppliers, importers, logistics companies, manufacturers, dealers, insurance companies, leasing branch offices: Our business activities and our services require collaboration with suppliers, importers, logistics companies, manufacturers, dealers, insurance companies or branch offices (collectively referred to as "Partners"). Depending on their business activity, our Partners use the transferred data for a range of purposes, including the identification and allocation of the options and accessories ordered for a vehicle, the manufacture or delivery of the agreed options and accessories or of the agreed vehicle as well as the verification of the payment amounts. We may provide our Partners with information on the outcome of the application review, the content of the contract as well as the performance of the contract and send them all the contractual documents and enclosures. In addition, we may provide our Partners with your personal data (e.g. first and last name, date of birth, family or marital status, address, client number, order

number [if any]), vehicle data (e.g. vehicle identification number, mileage, model), and financing data (e.g. vehicle sales price, payment date, contract start and end dates, late payments, existence of payment protection insurance [PPI]).

(e) With your prior consent, we transfer your personal data and information about the subject matter of the agreement and the financial plan you initiated to the Partners through whom the vehicle was provided. This data is used by the Partners for marketing products and services offered by the Partners and their group companies, including but not limited to loyalty and renewal campaigns, as well as for marketing analysis activities before and after the campaign.

(f) When personal data is transferred to Partners, the Partners will treat it in accordance with their own privacy policy, which is available on the respective Partners' website, and may share it with third parties, including group companies, professional advisors (e.g. auditors) and suppliers.

(g) Data transfer to third parties involved in the execution of client orders or transactions and the provision of services (e.g. payees, dealers and other service providers).

(h) Data transfer to contractual partners, clients and involved persons: If you work for one of our contractual partners (e.g. for a client or supplier), we may transfer data about you to said partner. We may also disclose personal data to persons acting on your behalf (authorized representatives) or who are otherwise involved in the execution of the contract.

(i) Data transfer to service providers (e.g. IT providers, marketing, newsletter, sales, communication, market research, or print service providers, debt collection service providers, real estate service providers, credit rating agencies, credit agencies, etc.).

(j) Data transfer to supervisory, law enforcement and other authorities and public bodies.

(k) Data transfer to parties in potential or actual legal proceedings or legal disputes.

(l) Data transfer to collaboration partners of UBS Group companies.

(m) Data transfer to potential or actual purchasers of companies or of parts of or assets of UBS Group companies.

(n) Data transfer to UBS Group companies and/or to a third-party company (including any special purpose vehicles [SPVs], trustees [or fiduciaries], bondholder representatives, account-holding banks, cash managers, credit rating agencies, etc.) in Switzerland, in a member state of the European Union, in Liechtenstein, in Norway, in the United Kingdom or any other country in which the bank has subsidiaries that are involved and in connection with collateral for securitization transactions, other financial products, the sale of portfolios of receivables or similar transactions.

(o) Transmission of data to UBS group companies and/or to third parties in order to obtain services from them.

(p) Data transfer to our independent auditors and other third parties, about which we may inform you separately (e.g. in the context of declarations of consent or data protection notices).

Prior to transferring your personal data, we carry out a careful review of the respective data recipient and contractually obligate said recipient to maintain adequate data protection and confidentiality regarding your data. When transferring

data that is subject to bank-client confidentiality due to a client relationship with us, we will – if necessary – obtain a waiver of bank-client confidentiality from you in advance.

An existing, former, or future client relationship between you and us may be retrospectively established in this way. We can neither influence nor prevent this situation.

8. To which countries might we transfer your personal data?

Some of the recipients listed under point 7 above are located outside Switzerland. Your personal data may therefore also be processed in a member state of the European Union, in Liechtenstein, in Norway, in the UK, and in the US, or in exceptional cases in any country in the world. If we transfer personal data to a country that does not provide an adequate level of data protection as defined by the DSG (e.g. the US), appropriate security measures will be taken to ensure that the data in question is adequately protected (in particular on the basis of standard contractual clauses), insofar as the recipient is not already subject to a legally recognized framework to ensure data protection and we cannot rely on an exception. An exception may apply in particular to legal proceedings abroad, as well as to overriding public interests or if execution of the contract requires such disclosure, where you have consented or if the matter involves data that you have made generally available, and you have not raised an objection to the processing of such data.

9. For how long will my data be stored?

We process and store your personal data for as long as is necessary to fulfill our contractual and legal obligations or according to the purpose of the respective data processing. If your personal data is no longer required for the aforementioned purposes (see point 6) and the applicable law and/or regulatory requirements do not provide for longer retention periods, the data will be erased or anonymized.

10. Profiling and automated individual decisions

Within the scope of the processing purposes outlined in point 6, we may process and analyze your personal data in an automated, i.e. computer-assisted manner. As part of this process, we can use the data collected pertaining to you (see point 5) to create profiles of your interests and other aspects of your personality. We use these profiles in particular for the following purposes:

(a) Contract review and execution (e.g. in connection with risk profiling and the determination of your investment strategy or to check your creditworthiness [scoring]. The scoring process involves calculating the probability that you will be able to meet your payment obligations in accordance with the contract. This calculation may be influenced by factors such as income, expenses, existing liabilities, occupation, employer, term of employment, experience from business relationships thus far, contractual repayment of previous credit and information from credit information offices, for instance. Scoring is based on a mathematically/statistically recognized and proven procedure, whereby the calculated scores help us with the decision-making process in the context of product deals and are included as part of ongoing risk management).

(b) Identification of risks, in particular in connection with risk management, combating money laundering, misuse, and fraud, and IT security.

(c) Tailoring of advertising for our products and services and those of our collaboration partners.

(d) Market research, product development and product enhancement.

Within the scope of the purposes specified, the profiles can be transferred to other UBS Group companies and to our collaboration partners. The recipients undertake to maintain confidentiality and to process the data received on their own responsibility.

As part of our services, we use automated processes in certain cases and may make automated individual case decisions. Such decisions are made, for example, in the areas of lending or fraud prevention. These procedures are based on predefined and continuously reviewed criteria and use technologies such as algorithms and data analysis. We ensure that these processes comply with legal requirements and that appropriate measures are in place to protect your rights, freedoms and legitimate interests. You have the right to request information about the underlying logic of the automated decision, to challenge the decision and to request a review by a natural person, see point 12 (g).

11. Use of cookies and other tracking and analysis technologies

Within the scope of the processing purposes outlined in point 6, we use cookies and/or other tracking and analysis technologies on our websites. For more information, please read our Privacy Policy for visiting the public area of the website [www.bank-now.ch/en/privacy-statement-and-terms-conditions-website]. Please note that we also monitor your behavior in connection with our newsletters (e.g. if and when you opened one of our newsletters or accessed any links contained therein).

12. What rights do I have?

You have the following rights under data protection legislation:

(a) **Right to information**: You have the right to be informed about the processing of your personal data by us.

(b) **Right of rectification in respect of incorrect or incomplete personal data**: You have the right to rectification if personal data that we hold about you is incorrect or incomplete.

(c) **Right to erasure and/or anonymization**: You have the right to ask us to erase or anonymize any personal data that we hold about you.

(d) **Right to restriction of processing**: You have the right to restrict the processing of your personal data.

(e) **Right to data portability**: You have the right to obtain a copy of your personal data for further use by another data controller.

(f) **Right to object and withdraw consent**: You have the right to object to the processing of your personal data by us and the right to withdraw any consent given at any time by means of written notification (by post) or, unless otherwise specified or agreed, by email to us (see point 3), with future effect.

(g) **Automated processing**: If an automated individual decision is made (see point 10), you have the right to express your position and to request that the decision be reviewed by a natural person. In this case, please contact datenschutz@bank-now.ch;

(h) **Right to lodge a complaint to the supervisory authority**: You have the right to report any violations of data protection legislation to the competent supervisory authority (Federal Data Protection and Information Commissioner ["**FDPIC**"]: *https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html*).

Please note that we can only process data subject requests if a copy of a valid official ID (identity card, passport, Swiss driver's license, or Swiss residence permit) is submitted along with the written request. The 30-day response period begins only upon receipt of these complete documents. As long as no proof of identity is provided, your data subject request will not be processed.

13. What technical and organizational measures do we take?

We ensure that all persons (e.g. employees or contractors) who process personal data for us apply and implement the appropriate technical measures (e.g. use of passwords, encryption of sensitive personal data, regular backups, use of secure networks, etc.) and organizational measures (e.g. access only when required, signing of confidentiality declarations by the persons, etc.).

14. Changes to this Privacy Policy

We may amend this Privacy Policy at any time. The latest version of the Privacy Policy (which is published on the website) applies.