

## UBS (UK) Group Pension Plan

### UBS (UK) Group Pension Plan– Privacy Notice

January 2026

Independent Trustee Services Limited, part of the Independent Governance Group, is the Trustee of the UBS (UK) Group Pension Plan (the “**UBS Plan**”). Independent Trustee Services Limited (“**we**”) acting in our capacity as Trustee of the UBS Plan is committed to protecting the personal information of our members and persons connected to our members (“**you**”) and acting in accordance with your rights under data protection law. We are a “data controller” which means we are responsible for deciding how we hold and use your personal data.

The UBS Plan has two Sections:

- The Credit Suisse Section
- The UBS Section

We have different advisers for each Section.

Sometimes, our actuarial advisers, Aon Solutions UK Limited (for the Credit Suisse Section), and Mercer Limited (for the UBS Section) and the scheme actuaries for both Sections need to make decisions jointly with us about how your personal information will be used for the purposes of the UBS Plan. Aon Solutions UK Limited, Mercer Limited and the scheme actuaries have their own privacy notices relating to the UBS Plan. These can be found on their websites at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement> and [Mercer Privacy Notice relating to UK Actuarial Services](#).

Our legal advisers, Sacker & Partners LLP and Gowling LLP, may also (in certain circumstances) need to make decisions about how your personal information will be used for the purposes of the UBS Plan. The privacy notices of Sacker & Partners LLP and Gowling LLP can be found on their websites [Pension scheme members, beneficiaries and client's employees](#) and [Privacy statement | Gowling WLG](#).

For the Credit Suisse Section, as part of the buy-in transaction carried out in 2024, we needed to provide Legal & General with certain information about Credit Suisse Section defined benefit members and their beneficiaries. Legal & General are data controller of the data provided. A copy of the Legal & General privacy notice can be found on their website at [www.legalandgeneral.com/institutional/pension-risk-transfer/privacy-policy](http://www.legalandgeneral.com/institutional/pension-risk-transfer/privacy-policy).

We collect and process the following information about you:

- your personal details: your name, gender, date of birth, contact details (e.g. home address, phone number or email) national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits: your member identifying number (which is assigned to you by the UBS Plan), the date you joined or left the UBS Plan, your earnings, the category and value of contributions and benefits that you receive, any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax information, tax protections or other adjustments;

- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a “pensions identifier”, which is a string of characters used to identify your specific benefits under the UBS Plan; and
- in some cases, special categories of personal information: your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you) (referred to as **“special categories of personal data”**).

Where applicable, we also collect information about your nominated beneficiaries, dependents or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

The information about you that we collect comes from:

- application forms or other materials you submit to us in relation to your membership of the UBS Plan;
- if you have transferred-in benefits from another pension scheme, that transferring scheme;
- your interactions with us, transactions and use of our products or services (including the use of our website);
- your legal representatives or guardian (if applicable);
- regulatory authorities (such as The Pensions Regulator) or government departments (such as HMRC or DWP); and
- in some cases, directly from Credit Suisse International, UBS AG and UBS Business Solutions as your employer, or previous employer, or from third parties providing certain services for the UBS Plan, such as tracing and mortality screening services.

## How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other pension schemes;
- b) for general administration of the UBS Plan, including but not limited to, recording, calculating and paying benefits, actuarial valuations, reviews we or our administrators conduct for statistical and reference purposes, for audit purposes, any corporate transactions, employee restructuring, human resources or benefit changes undertaken by your employer, to allow you to flex your benefits including your pensions options, and other checks or administrative activities that become necessary from time to time (for instance member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, assisting regulators or other authorities with the investigation or prevention of crime, and carrying out internal investigations in relation to the same;
- d) to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes “matching”, where we use personal data that a user has provided to search our UBS Plan records to check whether that user is a member of the UBS Plan, and where we collect further personal data from that user in the event of a “possible match”;
- e) to improve our processes and our use of technology, for testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the UBS Plan; and
- f) when we, or relevant UBS group companies, undertake activities from time to time to help us manage the liabilities of the UBS Plan. Examples of this activity are obtaining life insurance, longevity hedging, risk transfers, scheme mergers, bulk transfers, pension

increase exchanges and enhanced transfer value exercises and (where relevant) disclosures to UBS group companies or administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for the purposes of the following legitimate interests:
  - our legitimate interests in providing you and your survivors with benefits
  - to which you are entitled under the UBS Plan and administering the UBS Plan, by pursuing the purposes set out in a) to f) above;
  - the legitimate interests of the UBS group of companies in
  - providing and/or securing retirement, ill-health and death benefits under the UBS Plan and carrying out the audit and corporate transaction purposes referred to above; or
  - your legitimate interests and those of your survivors in receiving benefits
  - to which you are entitled under the UBS Plan, to the extent that such interests are not overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, respond to a request from relevant authorities, regulators or government bodies referred to below, or to make a disclosure to the same;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special category personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain; or
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the UBS Plan rules require you to provide information which we cannot otherwise process without your consent.

You are not obliged to provide us with your information when it is requested from you. However, if such information is required by us to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries and this information is not provided, we may be unable to record or pay your or your beneficiaries' benefits.

We may, at times, need to process special categories of personal data such as information about health or sexual orientation. The processing of this type of data is only permitted in more limited circumstances. We may, for example, process special categories of personal data:

- where you have given your explicit consent;
- where the processing is permitted on the basis that it is in connection with employment, social security and social protection; or
- where you have made the data manifestly public.

## **Disclosures of your information**

We may share your information with the following recipients:

- our suppliers, relevant members of the UBS group and other providers of services to us and the UBS group, such as administrators, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the UBS Plan actuaries (for actuarial calculations), auditors (to audit the UBS Plan), legal advisers, investment consultants (to provide the Trustee with investment advice), insurance brokers (to manage actual and potential insurance claims on behalf of the Trustee) and printing, communication, IT and hosting, marketing, tracing and marital status checking providers (and when we share

information with these recipients we take steps to ensure they meet our data security standards, so that your personal information remains secure);

- members of the UBS group for other relevant purposes, such as for audit purposes, or in relation to corporate transactions initiated by the UBS group, or to allow you to flex your benefits including your pensions options;
- insurance and reinsurance companies, or the trustees and/or managers of other pension schemes, such as when we carry out the activities referred to in f) above;
- third parties with whom you have put us in contact such as another pension scheme to which you wish to transfer, your financial adviser or your GP;
- third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work;
- public authorities, regulators or government bodies when desirable or required by law or regulation, under a code of practice or conduct, or when these authorities or bodies otherwise require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Except where permitted by data protection legislation, we will not process your special category personal data nor pass it to a third party without your explicit consent.

## **Transfers of your information abroad**

In some circumstances, the use and disclosure of your information may involve transferring your information outside of the UK or the European Economic Area. In those cases, except where the relevant recipient country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details can be provided on request (see the “Contact Us” section below).

## **Retention of your information**

We will keep your information for the longer of (i) the period required to meet our legal or regulatory responsibilities, or (ii) the period envisaged within our records management policy. We determine the period envisaged within such documentation regarding the UBS Plan’s operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the UBS Plan, and responding to legal claims or regulatory requests. Because of the nature of a pension scheme we may need to hold on to your information for your lifetime and after you have died (i.e. to allow us to pay benefits, including benefits payable in the event of your death and respond to queries). Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

## Your rights

You have the following rights under data protection law:

- the right of access to your personal information held by us;
- the right to rectify your personal information when it is inaccurate and supported by appropriate evidence;
- the right to have certain personal information erased;
- the right to request that your personal information is only processed for restricted purposes;
- the right to object to the use of your information, including telling us that you do not wish to receive marketing information; and
- (in some circumstances) the right to require that certain of your information is transferred to you or a third party.

You also have the right to withdraw your consent at any time to the use of your information, to the extent such use is based on your consent. If you withdraw your consent, this does not affect the validity of any data processing which has taken place before your consent is withdrawn and it may affect our ability to provide benefits to you or your beneficiaries.

You can seek to exercise any of these rights by contacting us at the details in the “**Contact Us**” section below.

You can lodge a complaint about our processing of your personal information by contacting us at the details in the “Contact Us” section below.

If you would like to find out more about your rights, you can visit the Information Commissioner’s Office website (<https://ico.org.uk/for-the-public/>). You also have the right to lodge a complaint about our processing of your personal information with the office of the Information Commissioner. For more information, you can visit the Information Commissioner’s Office website <https://ico.org.uk/make-a-complaint/>

## Further information required to carry out requests

In some cases, it will be necessary to obtain additional information from you, such as to carry out your request for a transfer, to retire early on grounds of ill-health, receive certain lump sums or for payment of discretionary death benefits. We will notify you when your information is required for this purpose.

## Status of this privacy notice

This privacy notice was updated in January 2026. It is non-contractual. We reserve the right to amend it from time to time. Where we do so, we will take appropriate steps to bring the amendment to your attention.

## Contact us

If you have any questions about this privacy notice, you can contact us:

- at the following address:

Chief Operating Officer to the Trustee of the UBS (UK) Group Pension Plan, Independent Governance Group, 4<sup>th</sup> Floor, Cannon Place, 78 Cannon Street, London EC4N 6HL

- and by email

[creditsuisse@weareigg.com](mailto:creditsuisse@weareigg.com) if you have benefits in the Credit Suisse Section, and  
[ubssection@weareigg.com](mailto:ubssection@weareigg.com) if you have benefits in the UBS Section.