

# Global Privacy Notice for Institutional Clients

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This page was last updated on **28 February 2024**

## **Scope and Applicability**

At Citi we value your privacy and are pleased to introduce an update to our former ICG Global Privacy Notice.

This Global Privacy Notice describes how we process personal information in the course of providing global banking or financial services to corporate entities and institutions (“institutional clients”), and their service recipients, and is relevant to any documents or websites that make reference to or are linked with it.

Kindly read this notice in its entirety, and be sure to consult any applicable Supplemental Provision specific to your country or territory. Please be aware that Supplemental Provisions may not be required for all countries and territories.

Please be aware that certain lines of business servicing institutional clients in their domestic markets have not adopted this Global Privacy Notice. If you are a client of Citi in those countries or territories please refer to the specific Privacy Statements outlined in your documentation rather than this document.

Citi respects and protects the privacy of our clients and all persons that avail our services. We provide **banking and financial services to individuals, corporations, financial institutions, public sector organizations, investment managers, and service recipients in nearly 160 countries and jurisdictions. We serve institutional clients in the following business areas:**

<b>Services</b>
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Our suite of Services encompasses treasury, cash and trade banking services, and securities services. Within this offering Cash and Trade deliver an integrated suite of innovative and customized cash management and trade finance services to meet the needs of multinational corporations, financial institutions and public sector organizations. Similarly, our Securities Services arm provides cross-border support for clients with extensive on-the-ground local market expertise, innovative post-trade technologies, customized data solutions and a wide range of securities services that can be tailored to meet the requirements of our clients.

<b>Markets</b>
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Markets provides customized solutions that support the diverse investment and transaction strategies of corporations, governments, investors and intermediaries globally. The strength of our sales and trading, distribution capabilities span asset classes and currencies, sectors and products including Equities, Spread Products, Commodities, Rates and Currencies with a physical presence of trading floors in almost 80 countries.

## Banking

Banking is organized around three lines of business: our Investment Bank, which meets clients' capital raising needs and provides merger and acquisition and equity and debt capital markets-related strategic financing solutions; our Corporate Bank, which serves as the conduit of Citi's full product suite to clients; and our Commercial Bank, which helps mid-sized companies address the challenges of rapid growth and international expansion. The unified Banking & International organization oversees the local delivery of the full firm to clients in each of the 95 markets where Citi has an on-the-ground presence.

This comprehensive document is directed to individuals whose personal information is subject to processing in connection with our Services, Markets, and Banking lines of service. It delineates the fundamental principles governing the processing of personal information, outlines privacy rights, and provides guidance on how to exercise them. It is essential to clarify that this document is not intended, nor should it be interpreted, as a binding contract enforceable against individuals or data subjects. Additionally, it complements but does not alter the terms and conditions governing our relationship with corporate entities and institutions.

Finally, this document does not serve as a replacement for other Privacy Statements or Notices tailored for specific purposes or distinct business units catering to consumers, private bank customers or internal functions and services.

### **Please take note of:**

- a) **Supplemental Provisions applicable to certain countries or territories where services are provided (see Section 13.a)**
- b) **the Digital Platforms supplement, which describes how we collect and use technical personal information obtained from online banking and mobile applications for institutional clients (see Section 13.b)**
- c) **If you are a signer, account manager or director of an Institutional Client, please also refer to client terms and conditions provided to you.**

### **Definitions**

In this Privacy Notice we use the following terms:

**"You"** means any individual or natural person whose information or personal data we process in relation to financial services that we provide to Your Organization, or other service recipients.

“**Your Organization**” is the corporation or institution you are associated with as an employee authorised representative, director, shareholder or client, as the case may be.

“**Personal Information**” or “**Personal Data**” are equivalent terms to mean any information or data:

- that identifies or can be used to identify you.
- that relates to, describes, is capable of being associated with, or could reasonably be linked (directly or indirectly) with you; or (alternatively)
- that can be used to authenticate you or provide access to a business account.
- In certain US jurisdictions, information that identifies members of your household. However please note that we do not process Personal Information from other members of your **household, unless** where required by law or for legitimate business reasons related to purposes of reducing operational risk and the prevention of crime.

“**Sensitive Personal Information**” or “**Special Categories of Personal Information**” are interchangeable terms that refer to categories of Personal Information that require special handling due to their inclusion of certain elements such as racial and ethnic origin, religion, medical information, political or philosophical positions and biometric data. Personal information that has been aggregated and anonymised data is not considered Personal Information for purposes of this Privacy Notice. In some US jurisdictions, sensitive personal information includes Social Security Numbers, Passports, Drivers Licenses or State IDs.

We will only process Sensitive Personal Information with your consent, unless applicable law contains exceptions or allows us to process it under a different legal basis (for example to comply with our legal obligations). In order to prevent its involuntary processing please do not share Sensitive PI or Special Categories of PI about yourself or anyone else unless we have been asked. If we receive that information directly from you or from a third party, by accident or happenstance, we may remove and dispose of it. We remind data subjects that we have an authorization, not an obligation to receive personal information (including its protected categories) from you or a third party.

### **Changes to this Privacy Notice**

We may modify this Global Privacy Notice for Institutional Clients from time to time, to adapt it to changes in our products and services. Where changes are made, we will post a new version on this site. We will also inform our Institutional Clients as appropriate and in the manner set out in their terms and conditions.

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### 1. ENTITY RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION

The Citi legal entity (or entities) that provide the accounts, products and services You are receiving in the name of Your Organization, is acting as independent businesses and are responsible for determining how your Personal Information is collected, the purposes the information is collected for, and how it will be processed. This is the **Data Controller(s)**, also known as Data User(s) under the laws of certain countries.

#### Citi Data Controllers

Please refer to the Country or Territory Supplement relevant to your services for a list of Data Controllers where these are provided. A global list of Citi branches and affiliate is available [here](#).

#### Citi as Data Processors

In certain operations, Citi entities act as a **Data Processors, that is to say as service providers or operators (and not as Data Controllers): for example, where processing international payments, when executing commercial payments and transactions** on behalf of banks and merchants and other institutions, in transfer agency and payment agency agreements, and where we explicitly indicate that we are acting as service providers or data processors. This Privacy Notice does not apply to activities where we are processors, service providers or operators (the relevant privacy notice will be issued by the Data Controllers in those operations).

If, when acting as a Data Processor we are also required to comply with a legal obligation, for example, conducting age verification, scrutinizing payment beneficiaries names for international sanctions, fraud, money laundering or combating terrorism financing, or for our internal compliance and transaction reporting, we will undertake these discrete activities in the capacity of a Data Controller.

## 2. SOURCES OF PERSONAL INFORMATION

### INDIRECT: From Your Organization and other entities

#### Your Organization

We obtain information from **Your Organization** or **third parties**, such as financial institutions, government entities, credit reference agencies, recognised fraud data sharing mechanisms, both from domestic and international organizations, and from companies specialised in fraud detection and background checks.

To uphold the security, integrity and legality of our operations we obtain personal information from company or commercial registers, insolvency lists, and registers of persons that have been bankrupted or banned temporarily or permanently from holding directorships. Our contracted subscription services also review estimated wealth, court listings, court judgments, and press articles (mainly on allegations of corruption and other red flags) on senior government figures and politically exposed persons, and our security and information services review international sanctions lists and anti-fraud cooperation mechanisms.

We also obtain (to a lesser degree) personal information from international and domestic payment infrastructures, financial and currency markets, investment and settlement infrastructures including clearing houses, securities depositories, stock exchanges, OTC or private exchanges and similar sources.

As required and/or permitted by law, we also monitor and record telephone, email, instant messaging, and other online communications with us have resulted or may result in a banking or financial transaction.

#### DIRECTLY: From You

We obtain information **directly from You** from various sources:

- **Account activities:** bill payments, deposits, withdrawals, investments, and any other transactions in which you are an authorised corporate or operational signer.
- **Forms and Applications:** product variation or modification, lines of credit and credit limit increases, signatory names and signature sample forms, and electronic instructions).
- **Electronic and verbal communications with you, your banking representatives, or our corporate clients:** calls to our trading desks, client service desks, text and electronic messages and any other communications we receive from you, Your Organization, institutions you are employed by or other third parties. We do this for the purposes of documenting instructions from you, authentication, and for the purposes of security and quality assurance.
- **Citi Digital Platforms.** We process technical data and personally identifiable data related to transactions you perform in our Internet sites

and mobile applications, in accordance with your contact preferences, cookie and profiling choices. Please refer to the Digital Platforms Supplement for more information.

### 3. CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND PROCESS

#### General Categories of Personal Information

Citi collects personal information about you, for purposes indicated in this Global Privacy Notice.

The **categories** of personal information that we process, with their elements include:

- **Your identity:** name, organization, title, and job description within Your Organization. We also collect your home address and country of residence and date of birth, as required by international payment and securities infrastructures.
- **Sensitive personal information we collect:** For certain operations, including payroll or international payments into the Euro area and other geographies, and for age and /or identity verification, we may collect, certify and store images and other details from your passport or other ID document, unique tax ID registration, and collect samples in signature cards. In some countries these data are considered sensitive.
- **Business contact details** in Your Organization, such as business and email address, and your telephone number.
- **Information about your banking authorizations** as an officer or attorney for Your Organization, authorised/corporate and operational signatures, and your other interactions in relation to Your Organization.
- **Your direct interactions with us**, your preferences and methods of communications, corporate marketing options, cookie and tracker choices, and your service preferences.
- **Information relating to your personal assets**, as part of our Know Your Client (KYC) legal and regulatory obligations, and to identify your holdings in the ownership structure of Your Organization and any other corporate entities you are associated with.
- **Information relating to your financial and credit background**, and your personal address, in order to open and maintain accounts, products, and services contracted for you by Your Organization.
- **Information required for specific legal or regulatory purposes** including anti-money laundering (AML) and/or sanctions and investor screening processes (e.g., copies of your passport or signature specimens) or for transaction performance and management purposes.
- Personal Data gathered from contracts or arrangements Your Organization has opened with us.

## General Categories of Sensitive Personal Information or “Special Categories of Data”

Where required by law, we process sensitive information (special categories of personal data), your Social Security and other national identity indicators. We have systems that compartmentalize such information, and operational, technical and governance measures, including access controls that protect the confidentiality and security of all information.

We only collect and process personal information that is necessary for us to provide our services and as required by business, legal, and regulatory aims. We will offer detailed information and additional disclosures if appropriate where we collect or otherwise process special categories of personal data, such as biometric or behavioural personal data that we obtain from your interactions with our systems and applications, including by way of example your mouse speed and movements, your keyboard usage, and voice pattern recognition for telephone banking. When we use the built-in biometric authentication technology in your mobile device, we do not have access to your biometric data, which remains stored in your mobile device.

### Digital Personal Information

For details on the information we collect from your device, and your use of digital resources please consult :

- For internet banking and mobile banking applications for persons related to institutional clients please read the *[Information for Digital Platforms in Section 12.b](#)*).
- For information collected from Cookies, Trackers and Similar technologies used in our websites, please read our [Cookie Policy for IC Clients](#).
- Visitors to our global webpage and investors, can consult our [Privacy Notice for Visitors](#)

## **4. PURPOSES AND USES OF PERSONAL INFORMATION**

We use your Personal Information for the following purposes:

- Communicate with you in relation to banking and financial services provided to Your Organization:
  - To verify your identity and communicate with you.
  - To improve relationships with you and Your Organization.
  - To inform you about products and services Your Organization has, and to offer other services that may be of interest for Your Organization (subject to your marketing preferences).
- Deliver our services to Your Organization:
  - To provide our products and services, including opening and maintaining accounts for your organization.

- To manage and administer our banking business.
- For system and IT network administration, and for the operation, testing and support of our Digital Platforms.
- To enable third parties to deliver products or services on our behalf, including payment services.
- In communicate with credit reference and financial background research agencies.
- To meet our obligations to and cooperate with stock exchanges, alternative trading systems, clearing and settlement agencies, brokers and similar entities.
- Manage our business:
  - For business development activities, analysis and planning purposes.
  - To investigate and respond to IC client issues and complaints.
  - To establish, exercise, or defend Citi and third party's legal claims, including for breach of contract or of adherence to terms of use.
  - For research and other statistical and trend analysis, in each case de-identifying and aggregating or anonymizing sample data so that it is no longer personal data.
  - To guarantee our property rights, protect our own safety, the safety of your organization and of third parties, including loss and fraud prevention.
- For our own legitimate interests and those of other financial institutions (provided they are not overridden by your own rights and interests) and to comply with applicable laws:
  - For fraud prevention and other financial criminal activity.
  - For internal risk assessment and controls, by way of example, to detect or resolve cyber incidents or fraud.
  - To comply with judicial requirements, including to exercise our rights in judicial, administrative or arbitration litigation.
  - Some laws will require you to provide us with certain tax information, or complete tax declarations.
  - For regulatory reporting requirements, e.g., financial reporting, Central Bank reporting.

### **Use and Disclosure Rights**

Certain countries and territories require Citi to offer to individuals the options and means to limit their use or disclosure of personal information. Please refer



to the Special Provisions for your country or territory for information on these additional rights and how to exercise them.

Citi does not sell nor share your Personal information with third parties for their advertising or other commercial purposes. We also do not disclose the Personal Information of persons under the age of 16 (see 'Minors and Children' further below).

### **Artificial Intelligence, Automated Decision-Making and Profiling**

Citi does not delegate control or decision-making functions to automated processing means (including Artificial Intelligence) and does not engage in profiling that may result in legal or similarly significant effects. Nevertheless, we use artificial intelligence to monitor transaction data, to ensure the consistency and correctness of outputs, detect and prevent illegal activities, for risk management and investment analysis, as an information tool for our personnel. We use fully automated means on securities markets (for example in algorithmic trading) solely where all information is de-personalised. If Your Organization is our client, depending on your digital marketing choices, we may create user profiles to offer you products targeted to Your Organization. Our marketing communications have links to change your preferences or suppress further notifications.

## **5. LAWFUL BASIS OF DATA PROCESSING**

The lawful basis that we rely on for data processing vary, depending on the applicable law in the location where we provide our services. These include as the case may be:

- **Consent:** We use consent as a lawful basis, subject to conditions applicable in the country where consent is collected, **only where:**
  - We are required by law to obtain consent or
  - Where consent can be assumed or inferred from your conduct
- **Performance or Delivery of a contract**
  - We will use this lawful basis for processing if:
    - We have a contract with you (or with Your Organization, for your benefit) and we need to process your personal data in order to deliver the products and services referred to in that contract. For example, to set up and manage an account with us, or to process payments.
    - You have asked us to take steps in order to enter into a contract with us or Your Organization. For example, to provide you with a quote or to process your account application.

In countries where we process personal data under consent as legal basis, we will infer it from your continued use of our

services, unless we are under a legal obligation to collect positive consent.

- **Legitimate interests**
  - We will use this lawful basis for processing if:
    - We have a legitimate business purpose for processing your personal information; and
    - Processing your personal information is necessary to achieve this purpose; and
    - Our legitimate business interest is not overridden by your individual interests, rights and freedoms.
- **Compliance with a legal obligation**
  - We will use this lawful basis for processing if we need to process your personal information to comply with a legal obligation. This may include without limitation:
    - Providing information on request to government and regulatory bodies securities and commodities markets, securities brokers, and our intermediaries or counterparties
    - Conducting regulatory compliance activities such as: audit and reporting, accounting and tax records, prevention of fraud and other forms of economic crime, complying with international sanctions and anti-terrorism legislation background or KYC verification and screening of senior government officers and politically exposed persons (PEPs)

When we collect and process sensitive personal information, or Special Categories of Information, we will do so by obtaining your explicit consent unless the law allows us to rely on prescribed exceptions:

- If the processing of personal data is clearly needed for your benefit, and your consent for its collection, use or disclosure cannot be obtained in a timely manner, or where you would not be reasonably expected to withhold consent.
- If your consent is for a substantial public interest or in the legitimate interest of another person (including us) provided that processing must not extend to what is reasonable to provide a legitimate outcome and the protected interest outweighs any adverse effects of the processing your personal information.

## **6. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION IF REQUIRED**

We may require certain data to fulfil our contractual obligations or to comply with legal obligations. If you choose not to provide this required data, it may impact our ability to provide you with our services effectively. For example:

- Account Management: Without accurate contact and financial information, we may not be able to manage your accounts effectively, which could impact your access to our banking services.
- Compliance: Failure to provide necessary legal and regulatory information may result in non-compliance with applicable laws and regulations, which could have legal consequences for your institution.

## 7. YOUR PRIVACY OR DATA PROTECTION RIGHTS

You have rights over your personal information that are protected by law in many countries. Most countries grant 4 basic rights: Access, Rectification, Cancellation and Objection (by their initials, the so-called **ARCO** rights). Citi extends these, and other rights set out in the EU General Data Protection (GDPR), beyond the requirements under local law, in order to provide a consistent standard across our operations globally.

You can [CONTACT US](#) to request any of the following rights:

- Right to be informed
  - You have the to be informed of sub-processors (sub-contractors) that receive your data and a summary of processing purposes and of how we use operational and technical measures to protect your data.
- Right to access your information:
  - You can [contact us](#) to request a copy of the personal information we hold about you. This is often known as a ‘subject access request’.
- Right to rectify your information
  - You can [contact us](#) to ask us to correct personal information that you believe we hold which may be inaccurate or incomplete.
- Right to erase your information (or “right to be forgotten”)
  - You can [contact us](#) to ask us to erase personal information that we hold about you, which we will carry out unless we are required to retain the, for a specific duration, in order to prevent fraud and other forms of crime, or for our defence in claims.
  - There may be some instances where we are not able to erase your personal information if we are under a legal requirement to store product applications or information in relation to banking or securities transactions. If this is the case, we will clearly explain in our reply to your request the reason we are unable to cease processing (and storing) your personal information.
- Right to transfer your information to another organisation
  - You can [contact us](#) to ask us to transfer your personal information to other organisations. This is often known as the ‘right to data portability’.

- There may be some instances where we are not able to transfer your information, if we are relying on a lawful basis other than ‘consent’ or ‘contract’ to process your personal information.
- Right to restrict processing of your personal information
  - You can [contact us](#) to ask us to restrict processing of your personal information.
  - There may be some instances where we are not able to restrict processing of your personal information if you do not provide us with a particular reason for wanting the restriction.
- Right to object to processing.
  - You can [contact us](#) to object to us processing your information.
  - We may not always be able to accept your objection, if we need to continue to process your information for our business, legal and regulatory and other purposes.
- Right to object to the grounds of legitimate interests for processing
  - Where we rely on legitimate interests as the lawful basis for processing your personal information, you can [contact us](#) to object to us processing your information on these grounds.
  - We will always consider your reasons for objecting to us processing personal information on these grounds, and balance your interests, rights, and freedoms with our legitimate business interests.
- Right to withdraw your consent for processing your personal information
  - You can [contact us](#) to withdraw your consent for processing your personal information.
  - If you withdraw your consent for processing of your personal information and it is necessary for us to conclude a transaction or for legal and regulatory purposes, then we may not be able to provide you with the relevant products and / or services that require such consent.
  - There may be situations where we are unable to stop processing your personal information after you withdraw your consent, where it is a legal requirement for us to continue using or storing certain information. If this is the case, we will clearly explain the reason we are unable to stop using (and storing) your personal information.

Citi may not always be able to provide all requested information or fulfil other rights where certain exceptions apply to a privacy rights request. In our reply, if we need to withhold certain information or fulfil your request we will explain the rationale for our decision, and the subsequent steps.

We will always respond to your request within the timeframes provided under applicable law.

To ensure your safety and given the confidentiality of financial information, we must verify your identity before disclosing any personal data. If you are making a request on behalf of someone else (as an attorney or a friend or relative) we may require further information to ensure that you are duly authorised to make that request.

## 8. DISCLOSURES AND RECIPIENTS OF PERSONAL INFORMATION

For the purposes providing banking and financial services, we disclose personal information to third parties (including our affiliates) confidentially, and where necessary, as follows:

- to Your Organization, in connection to the services that we provide to them.
- To our affiliates or internal business groups, who receive or have access to personal information about you, if you request or use their services including online portals and Apps.
- To Citi's service providers who assist business functions such as application processing, fraud and money laundering monitoring, and the provision of client service centres and web hosting, and data analysis.
- To stock and security trading houses and exchanges, alternative trading systems, settlement agencies, facilities and similar entities, including clearing houses, payment infrastructure providers, counterparty banks, and any persons from whom we receive or make payments instructed or received by you.
- To securities brokers, custodians, sub-custodians, fund administrators, fund houses, depositaries, trustees, financial market infrastructure service providers (including settlement and securities payment providers), and
- To professional services providers: auditors, insurers, legal counsel, and to competent regulatory, tax, governmental or jurisdictional authorities, including central banks and financial regulators, and to the courts of any competent jurisdiction, domestic or foreign.

We will only share your information for the purposes outlined in the Section 4 (“**Purposes and Use of Personal Information**”) in this Global Privacy Notice.

Where required by applicable law, we shall add to Country or Territory Supplemental Provisions, and to our client terms, details of third parties we share information with, their locations, and the categories of information that we share.

## 9. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We provide services to corporations and institutions in more than 120 countries and territories. Your personal information is stored and processed where Your Organization opens a product or receives a service, and backed up and further processed (unless your country or territory has data localization laws) in global service centres, for operational and regulatory purposes. The Supplemental Provisions indicate their location.

We transfer personal data in outgoing payment orders and other cross-border instructions to correspondent banks. Where there is an incoming payment or any other transaction, we will transfer beneficiary account information to our correspondent bank if the payment is processed through our WorldLink<sup>®</sup> service, or if the funding account is held in another Citi affiliate, or if we are required by statutory obligations.

Citi and its service providers transfer your personal information to countries and territories that may not provide legal protection that is equivalent to that offered in the place of business or establishment of Your Organization. For this reason, we take steps to ensure that your personal information receives an optimal level of protection wherever we process it, by using our own affiliate organizations, or if otherwise, by introducing appropriate contractual and technical and operational means, including standard contractual clauses, complemented with transfer impact assessments (TIA) and specific measures to resolve any issues detected in a TIA. Where transferring data is an essential pre-requisite for executing a banking instruction, carried out as mandated, and with the knowledge and in the interest of the client, we may rely in legal exceptions or derogations for international data transfers in countries that have no formal declaration of data equivalence or 'adequacy'.

## **10. STORAGE AND RETENTION (ARCHIVING) OF PERSONAL INFORMATION**

We process personal information only for the length of time that is necessary to carry out the purposes for which personal data was collected and retain your data during such time Your Organization's accounts and products are open, or a transaction is active, and for a certain time after their closure. Our retention periods vary in accordance with applicable law in the country where we provide services, including under relevant commercial codes, banking and securities acts, anti-money laundering and external legislation, and lastly, in accordance with statutory limitation periods. When the retention of your personal information is no longer necessary, we will securely dispose of it by destroying the data, or we will irreversibly anonymize it, so that it is no longer personal data. The Country and Territory Supplements indicate the applicable retention terms.

## **11. SECURITY**

Citi stakes reasonable steps to preserve the security of personal information.

All personal information is held in a protected environment with sufficient organizational and technology measures appropriate to a professional financial organization. We have implemented security controls, procedures and protocols across our different business lines, physical premises, and IT networks to minimize loss, misuse, unauthorized access, modification, or disclosure of personal information. All information shared with external third parties is encrypted during transmission and in storage, and all information held internally is protected using security passwords and logons or other security procedures. However, due to the inherent nature of electronic communications,

we cannot guarantee the security of personal information outside our networks.

## 12. MINORS (CHILDREN)

Our products and financial services are intended for corporate, government and institutional clients, and are not designed for persons that cannot enter into business transactions in their own name, including children.

We do not knowingly collect without consent from their parents or guardians, personal information from persons under the age of 16, other than for executing payments. We do not sell, share, or use their data for social media and we do not have targeted advertising directed to children.

We may process personal information relating to minors with prior consent from their parents or guardians, if they are named beneficiaries of trusts, wills or insurance policies, and for similar uses permitted by law. If you have reason to believe that information about a child has been provided to us in error, please contact us.

## 13. SUPPLEMENTAL PROVISIONS

### 13.a Supplemental Provisions for Countries and Territories

#### NORTH AMERICA

##### CALIFORNIA

- [California Supplemental Provision](#)
- [California Notice at Collection](#)
- [California Privacy Hub](#)

#### ASIA-PACIFIC

##### [HONG KONG](#)

##### [JAPAN](#)

##### [SINGAPORE](#)

##### [SRI LANKA](#)

##### [VIETNAM](#)

#### LATIN AMERICA

##### [JAMAICA](#)

[PANAMA](#) (in [English](#)) (en [Español](#))

#### EUROPE, MIDDLE EAST AND AFRICA

[EUROPEAN ECONOMIC AREA, EUROPEAN UNION, UNITED KINGDOM and OTHER EUROPEAN COUNTRIES.](#)

##### [NIGERIA](#)

##### [KENYA](#)

## TANZANIA

European Union Countries (EU)				European Economic Area (EEA) (+EU Countries)	OTHER EUROPEAN COUNTRIES WITH SIMILAR OR EQUIVALENT LAWS
Austria	Estonia	Italy	Portugal	Iceland	United Kingdom
Belgium	Finland	Latvia	Romania	Liechtenstein	Jersey
Bulgaria	France	Lithuania	Slovakia	Norway	Guernsey
Croatia	Germany	Luxembourg	Slovenia		Monaco
Cyprus	Greece	Malta	Spain		Isle of Man
Czech Republic	Hungary	Netherlands	Sweden		San Marino
Denmark	Ireland	Poland			The Vatican

### **13.b Supplemental Provisions with Information about our Digital Platforms**

Please click [here](#) to access our Digital Platforms supplement, which applies to Citi's online banking and trading portals, and mobile Apps.

### **13.c Supplemental Provisions for Citi Research**

Citi Research activities are covered by a separate document, accessible [here](#)

## CONTACT INFORMATION

Please use the [Contact Us](#) links provided under Section 6 (“Your Privacy or Data Protection Rights”) to exercise your data subject rights, or refer to the Supplemental Provisions for the location where we provide services.

You may also contact our Data Protection Officers as indicated in the Supplements, including:

<p><b>California Residents</b></p> <p>If you have any questions about this Supplement, the ways in which Citi collects and processes your Personal Information described in this Supplement, your choices and rights regarding such use, or wish to exercise your rights under the CPRA, please visit <a href="#">Citi California Privacy Hub</a> or call us at 833-981-0270 (TTY: 711)</p>	
<p><b>Citibank Europe plc Data Protection Officer</b></p> <p>1 North Wall Quay</p>	<p><b>Citi UK and European Chief Privacy Officer (Data Protection Officer)</b></p>



Dublin, Ireland D01 T8Y1 Email: <a href="mailto:dataprotectionofficer@citi.com">dataprotectionofficer@citi.com</a>	40 Bank Street, 9 <sup>th</sup> Floor London E14 5AB United Kingdom Email: <a href="mailto:dataprotectionofficer@citi.com">dataprotectionofficer@citi.com</a>
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If you feel that your data has not been handled correctly by Citi, or you are unhappy with our response or have concerns regarding the use of your data, you have the right to lodge a complaint with a data protection authority in the country where the alleged infringement of data protection law occurred.

Contact details for data protection authorities can be found here, and as otherwise indicated in any country or territory-specific supplemental provisions:

**EU/EEA:** [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

**United Kingdom:** Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk)

**Jersey:** Office of the Information Commissioner: <https://jerseyoic.org>