

January 2021

Citi ADGM Privacy Notice

Frequently Asked Questions

Citibank N.A (ADGM Branch)

1. Purpose of this notice

Citibank N.A. (ADGM Branch) (**Citibank** or **we**) provides products and services to corporations, financial institutions and public sector organizations. This privacy notice explains how Citibank collects and processes personal data about people with whom we come into contact in the course of our dealings. This includes employees, officers, directors, beneficial owners and other personnel of our clients, service providers and other business counterparties (referred to as **you**). We are required to notify you of the information contained in this privacy notice. This notice can be updated at any time and we will inform you if this occurs.

Citibank is responsible for deciding how to hold and use personal information about you, and is a controller for the purposes of the ADGM Data Protection Regulations 2021 (the **DP Regs**). Citibank is a global bank that comprises a number of distinct legal entities. In the UAE, this includes the entity noted above, being Citibank N.A. (ADGM Branch), Citibank N.A (UAE branch offices), Citibank N.A. (DIFC Branch); and Citigroup Global Markets Limited (DIFC Branch). If you are a customer of Citibank (or if you otherwise contract or engage with Citibank in any capacity), your controller for the purposes of this privacy notice will be the Citibank entity you contract (or engage) with. However, there may be instances in which more than one Citibank entity is involved with the processing or collection of your personal data and therefore, may operate as a "joint controller" with one or more other Citibank entities.

It is important that you read this notice, together with any privacy notice that is provided together with any account opening documentation, and other disclosures when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

For further details you may contact our Data Protection Officer at cituaedpo@imceu.eu.smb.com or by telephone at 04-6044618.

2. The kind of information Citibank holds about you

Citibank collects, stores, and uses the following categories of personal information:

- contact details for home and/or business such as name, title, addresses, telephone numbers, telefax and email addresses;
- names and titles of owners, directors, shareholders, beneficiaries, counterparties, or similar individuals;
- dates of birth, gender, nationality;
- bank account details and tax status information;
- salary, employment, credit, and other property information;
- specimen signature, copy of passport, UAE residence visas; and
- other information required for know your customer screening (KYC), anti-money laundering law (AML) as part of client due diligence or onboarding process, or other sanctions checking processes which involves the screening of clients and their representatives against published sanctions lists.

3. How is your personal information collected?

Citibank typically collects personal information about customers through the account opening process and/or through the application form and supporting documents collected for the purposes of providing financial services and/or products, either directly or sometimes from third party sales agents (for example, if you have applied for a credit card) or service providers (for example, if we request a credit-check for you). We will sometimes collect additional information from third parties (including from international sanctions lists, publicly available websites, databases and other public data sources). We will collect additional personal information in the course of your relationship with Citibank.

We do not generally process biometric data. However, from time-to-time, we may process biometric data about you that we collect or receive from your interaction with our systems and applications. However, you may be able to log into or otherwise interact with our systems and applications by using biometric technology on your eligible mobile device. Such biometric authentication is a digital authentication method that utilizes your unique biometric data (eg, fingerprint or facial characteristics) and the built-in biometric technology on your eligible mobile device. Your biometric data remains on your eligible mobile device and is not transferred to us when this authentication method is used.

4. Legal basis for Processing

Why do we process your personal data?

We process your personal data, as necessary, to pursue our legitimate business and other interests, for the following reasons:

- to manage, administer and improve our business and service provider engagements and relationships and for direct marketing, business development and analysis purposes;
- to operate and manage our information technology and systems, and to ensure the security of our information technology and systems;
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist Citibank or others to do this; and
- to investigate, respond to and address complaints or incidents relating to us or our business, and to maintain service quality and to train our staff.

We also process your personal data to comply with laws and regulations. We sometimes do more than the minimum necessary to comply with those laws and regulations, but only as necessary to pursue our legitimate interests in cooperating with our regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets. This involves processing your personal data for the following reasons:

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies or other intermediaries or counterparties, courts or other third parties;
- to monitor and analyse the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and AML prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. This includes KYC screening (which involves identity checks and verifying address and contact details), politically exposed persons screening (which involves screening client records against internal and external databases to establish connections to 'politically exposed persons' as part of client due diligence and onboarding) and sanctions screening (which involves the screening of clients and their representatives against published sanctions lists); and
- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity. To the extent permitted by law, these recordings are our sole property.

4. Legal basis for Processing (continued)

In most cases, we do not rely on consent as the legal basis for processing your personal data. If we do rely on your consent, we will make this clear to you at the time we ask for your consent. Where we process your personal data on the basis of your consent, you may withdraw your consent at any time however, the lawfulness of any processing undertaken prior to the withdrawal of your consent shall remain unaffected.

In some cases, our legal basis may be that the processing is necessary for the performance of a task carried out in the substantial public interest on the basis of law (eg, the prevention and detection of crime).

If you do not provide information that we request, we may not be able to provide (or continue providing) relevant products or services to, or to otherwise do business with you.

When we process your personal data, we will do so in the following situations:

- to perform our responsibilities under our contract with you;
- to pursue a legitimate interest in processing your personal data. For example, we may process your personal data to send you marketing communications, to communicate with you about changes to our services, and to provide, secure and improve our services;
- to comply with legal obligations, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist Citibank or others to do this; and
- to act on your consent to do so.

When consent is the legal basis for our processing, you may withdraw your consent at any time.

5. How Citibank will use information about you

Information in the list above enables us to provide banking and/or financial services to you and to enable us to comply with our legal obligations.

Examples of situations in which we will process your personal information are listed below:

- making a decision on whether to provide financial services or products to you;
- send you technical notices, updates, security alerts, and support and administrative messages (such as changes to our terms, conditions and policies) and to respond to your comments, questions, and customer service requests;
- receive and respond to your submissions through electronic means;
- permit you to participate in voluntary polls and surveys (we may use third parties to deliver incentives to you to participate in such polls and surveys, and you may be required to provide your contact details to the third party in order to fulfill the incentive offer);
- communicate with you about products, services, and events offered by us and others, and provide news and information we think will be of interest to you;

5. How Citibank will use information about you (continued)

- monitor and analyze trends, usage, and activities in connection with our services;
- develop new products and services and enhance current products and services;
- detect, investigate, and prevent fraudulent transactions and other illegal activities, and protect the rights and property of Citibank and others;
- general administration of the contract we have entered into with you;
- business management and planning, including auditing and accounting;
- dealing with legal disputes involving you, or other banks, financial institutions or contractors;
- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.

Some purposes may overlap and there can be several grounds which justify our use of your personal information. If you fail to provide personal information when requested, we will not be able to fully perform the contract we have entered into with you (for example, paying you or providing a benefit), or we could be prevented from complying with our legal obligations.

Citibank will only use your personal information for the purposes we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated new purpose, we will notify you and we will explain the legal basis which allows us to do so.

Note that we will process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data sharing

Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers. Certain of these jurisdictions are recognized by the ADGM Commissioner for Data Protection as providing an adequate level of data protection in accordance with the DP Regs. A full list of all such countries is available here <https://www.adgm.com/operating-in-adgm/office-of-data-protection/jurisdictions>.

Where your personal data is transferred to, stored or processed in any country that is not recognized as providing an adequate level of data protection, such transfers, storage or processing shall be undertaken on the basis of: (a) that the transfer, storage or processing is necessary for the performance of Citibank’s contract with you; (b) that the transfer, storage or processing is necessary for the conclusion or performance of a contract that is in your interest; or (c) on the basis of your consent. As noted above, where any such transfer, storage or processing is undertaken on the basis of your consent, you are entitled to withdraw your consent at any time.

7. Data security

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Data retention How long do we keep your personal data?

We keep your personal data for as long as is necessary for the purposes for which the personal data was collected, including in connection with maintaining our relationship with you or in connection with performing an agreement with Citibank. We also retain your personal data where necessary to enable us to comply with a legal or regulatory obligation in accordance with our records retention policies and procedures. When the retention of your personal data is no longer necessary, we will securely destroy it or we will irreversibly anonymise it so that it is no longer personal data.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine appropriate retention periods for personal data, we consider the purpose for which it was created, legal and regulatory requirements, and business needs.

In some circumstances, we will anonymize your personal information so that it can no longer be associated with you, in which case we will use such information without further notice to you.

9. Rights of access, correction, erasure, and restriction What are your rights in relation to your personal data?

You may ask us to: (i) provide you with a copy of your personal data; (ii) correct your personal data; (iii) erase your personal data; or (iv) restrict our processing of your personal data. You may also object to our processing of your personal data. These rights will be limited in some situations; for example, where we are required to process your personal data to comply with a legal or regulatory obligation.

To exercise these rights or if you have questions about how we process your personal data, please contact us using the contact details in paragraph 10 below.

Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information:

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

- Request access to your personal information. 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 to continue 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 further below).

9. Rights of access, correction, erasure, and restriction (continued)

- 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.
- In certain circumstances specified by the DP Regs, request a restriction of processing of your personal information.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, request a restriction of our processing 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 your relationship manager by telephone or e-mail.

10. Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact cituaedpo@imceu.eu.smb.com. You have the right to make a complaint at any time to the Commissioner of Data Protection, the ADGM supervisory body for data protection issues.

11. Changes to this privacy notice

Citibank reserves the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates by providing a copy of the updated policy (or specific changes to this privacy policy, as the case may be) to our website at <https://www.citibank.com/tts/sa/tts-privacy-statements/> and will also notify you in other ways from time to time about the processing of your personal information.