

Citi Real Estate Services Privacy Notice

SCOPE

Your privacy is important to us. We perform regular assessment reviews to ensure that we comply with rigorous privacy standards to keep your personal information secured. This Privacy Notice ("**Notice**") applies solely to individuals who are [related/associated to organizations from whom Citi receives, or to whom Citi provides, real estate services, including without limitation landlords, tenants, subtenants and individuals who are related/associated to organizations that are agents, real estate service providers, contractors or other contacts of these real estate service providers or recipients] ("you") how certain Citi data controllers referenced below ("we", "Citi", "us") process personal information.

When we refer to a "Citi Company" or "Citi Companies" we mean another entity of our corporate group, including such Citi Companies' officers, directors, employees, contractors, temporary staff, agents, representatives, and professional advisers. This includes the Citi Companies that can be found in the link provided in this document. We advise you to read the Privacy Notice in its entirety.

As used herein, the term "Personal Information" means any information:

- that identifies or can be used to identify you, your dependents or other relations.
 - that relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you or your household.
 - that can be used to authenticate you or provide access to an account;
 - that relates to you and that might be sensitive (such as account number).
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What Personal Information is collected?

We generally obtain your personal data from you or from our dealings with you, or in certain instances from third parties, in each case as further specified below in this Notice.

Citi collects and may use certain Personal Information about you that you may voluntarily provide during the onboarding process (including, without limitation, your email addresses, your telephone numbers,

other contact details). Where permitted by law(s) in your jurisdiction, Citi may also collect data related to criminal convictions or offences as part of its background screening process.

Which Citi entity controls my Personal Information?

Your Personal Information will be controlled and processed by Citi and/or its affiliates. The relevant data controllers and processors of such personal data are the Citi entities that receive or benefit from services being provided by our real estate service providers pursuant to a contractual relationship (or a contemplated contractual relationship) between Citi and our real estate service providers. Information in relation to other Citi Companies who may receive or benefit from the services being provided by our real estate service providers can be found using the following web link and clicking on the relevant region and country in order to locate entity and contact information:
<http://www.citigroup.com/citi/about/countrypresence/>

Citi also will monitor real estate service providers entering and leaving Citi locations, in particular for:

- Ensuring adequate information systems integrity and detecting and preventing criminal activity, including cyber-crime;
- Protecting information, including, but not limited to, Personal Information, confidential information, and high-value business information against destruction, loss, alteration, unauthorized access, disclosure or hacking;
- Securing the effective operation of Citi's Information Systems; and
- Enabling compliance with applicable regulatory and self-regulatory obligations.

Does Citi process personally identifiable information?

We process the following personal data about you:

1. information that you provide to us directly (this may include your name, company, title and job description and your contact details such as your email address and telephone number and business address);
2. information about you provided by our real estate service providers (this may include your name, company, title and job description, your contact details such as your email address and telephone number and business address);
3. information within any emails or other communications that you or our real estate service providers send to us;
4. information that we learn or obtain about you from our dealings with you;
5. information that we obtain from any government issued documents that you provide to us (including passport and identification cards);
6. information that we learn about you from public sources (such as global news databases or open-source searches);
7. information that we learn about you from economic or trade sanctions lists;
8. identification and other background verification data such as a copy of passports or evidence of beneficial ownership/directorship or the source of funds to comply with client due diligence/"know your client"/anti-money laundering/anti-bribery laws and collected as part of our real estate service provider onboarding and ongoing monitoring procedures;
9. any other information about your relationship with us.

How will my Personal Information be used?

We may transfer your personal data between Citi and its affiliates and/or third parties (e.g., our service providers). For a list of the countries in which we operate, please see:
<http://www.citigroup.com/citi/about/countrypresence/>

In addition to other uses described herein, Citi will use your Personal Information with your consent (if so required) or otherwise and/or when we have a legal obligation or for legitimate business purposes,

or when we have a legal obligation, including but not limited to:

1. To manage our contractual relationship with you and/or to comply with a legal obligation.
2. To aggregate, deidentify and/or anonymize Personal Information. We may aggregate, deidentify and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
3. To accomplish our other business purposes.
4. For data analysis, such as to improve the efficiency of the services.
5. For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
6. For fraud and security monitoring purposes, such as to detect and prevent cyberattacks or attempts to commit identity theft.
7. Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

How will my Personal Information be shared?

We use and disclose your Personal Information for the purposes and under the legal basis outlined in the point above (How will my Personal Information be Shared). We (or any third party on our behalf) may disclose personal data to others as follows:

1. to any other Citi Company for the purpose of managing our and/or their relationship with you, our service providers and for the other purposes identified in this Notice. In addition, you should be aware that your (or your employer's) interactions with other Citi businesses and functions other than Citi's Chief Operating Office may mean that those functions are provided with and process your personal data in connection with their receipt of services, relationship management or for other reasons specified in this Notice;
2. to our service providers in connection with the services provided to us, and for the other purposes set out in this Notice;
3. as required in order to establish, exercise and/or defend and/or to protect legal claims, including in relation to our contracts with our service providers and in order to protect the rights, property, and/or safety of us, our business, any Citi Company, our service providers and/or others, including making disclosures to legal advisors, government and law enforcement authorities and to other parties involved in, or contemplating, legal proceedings;
4. to competent domestic and/or foreign regulatory, prosecuting, tax or governmental authorities, courts, or other tribunals in any jurisdiction, upon their request or in accordance with or as desirable in respect of any applicable law;
5. to communicate with credit reference and credit information agencies;
6. to any other third parties to the extent that such disclosure is required under applicable law or to enable us to receive services from our service providers;
7. in the case of threatened or initiated litigation, Citi and any Citi Company may process and exchange personal data with Citi management and internal and external legal counsel;
8. in the case of substantial business risks and for compliance with laws, risk criteria, procedures, and policies, we and any Citi Company may process and exchange personal data with the responsible chief trust officer, senior risk officer, compliance officer, legal officer, tax officer, anti-money laundering officer, fraud officer, audit officer, data protection officer, control officer, Citi leadership team, and Citi managers;
9. with Citi management and internal and external legal counsel as required in order to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our clients and in order to protect the rights, property and/or safety of us, our business, any Citi Company, our clients and/or others including making disclosures to legal, tax or other professional advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
10. to any competent regulatory, prosecuting, tax or governmental authorities, courts, or other tribunals in any jurisdiction: (i) for or in connection with an examination of us by bank or other examiners; (ii) pursuant to subpoena or other legal process; (iii) at the express direction of any

- other authorized government agency; (iv) to our internal or external legal counsel or auditors;
- 11. to others to whom we are required to make such disclosure by applicable law; and
- 12. to maintain centralized systems and applications, and
- 13. to prospective sellers or buyers as part of a sale or merger of our or any Citi Company's business or assets; and
- 14. to prospective lease/sublease assignees/tenants/subtenants.

If Citi appoints third parties to host, maintain, manage, or to provide other services in relation to the services, then your Personal Information may be accessed and used by these third parties to the extent necessary to fulfill their hosting, maintenance, managerial, and/or other functions.

Where will my Personal Information be stored?

Your personal information will be stored in Citi's data centers, which storage is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than those of the United States. Information about you may be stored and processed in any country where we have facilities or in which we engage service providers. Your personal information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Information.

Transfers and Use of your personal information outside of Europe and the United Kingdom

Citi's global headquarters are located in New York City, United States of America, and we have offices in over 95 locations worldwide. If your organization is engaged with a Citi entity in Europe (including the European Union, the European Economic Area, the United Kingdom, Switzerland and Jersey), personal data may be stored, transferred, or used outside of Europe to by Citi entities and third parties, as may be necessary for Citi to receive global services and manage its relationships with real estate service providers. We will use Standard Contractual Clauses ("**SCCs**") for intra-Citi transfers. In each case BCRs and SCCs are accompanied by Transfer Impact Assessments ("**TIAs**") and contractual, operational, and technical measures intended to close any risks that are detected by the TIAs.

A list of jurisdictions in which Personal Information may be processed, in scope of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and the Swiss Federal Data Protection Act ("**FDPA**") may be processed, includes the jurisdictions that can be found at:

<http://www.citigroup.com/citi/about/countrypresence/>

Is the Personal Information collected about me secure?

We seek to use reasonable physical, electronic, and procedural measures to safeguard Personal Information within our organization against loss, theft, and unauthorized use, disclosure, or modification. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while We strive to protect your information, we cannot guarantee its security.

What happens when Citi changes this Privacy Notice?

From time to time, we may revise this Privacy Notice. Updates may be made for any number of reasons, including to reflect industry initiatives, changes in the law, and changes to the scope of the services, among other reasons. If there is any change to this Notice you will be informed.

How long does Citi keep my Personal Information?

We retain Personal Information for as long is necessary for the purposes of our relationship with you or our real estate service providers, including in connection with performing an agreement with you or our real estate service providers or complying with a legal or regulatory obligation, and in any event, in accordance with Citi's records retention policy requirements.

Who can I contact about accessing, deleting or amending my Personal Information?

In certain countries/jurisdictions, you may have certain rights with respect to the Personal Information which Citi holds about you, including the right to access or correct (and sometimes, object to or delete) the information. If you have any questions related to our policy, please contact us at:

dataprivacyrealestateservices@citi.com

LEGAL BASIS AND USES FOR PERSONAL DATA

We process your personal data for the reasons set out below.

<p>Where we are required to do so by applicable laws to do this?</p>	<ul style="list-style-type: none">• To disclose information to government and/or regulatory bodies, courts or other third parties; and• To conduct compliance activities such as assessing and managing risk, maintenance of accounting and tax records, fraud, know your customer (“KYC”) and anti-money laundering (“AML”) detection and prevention and measures relating to sanctions and anti-terrorism laws and regulations anti-bribery, reputational risk screening, identifying conflicts of interest and fighting crime. If you are unwilling to provide Your personal data in these circumstances, then we may be unable to receive (or continue receiving) the relevant service from you, your employer, or the company, or other entity that you are associated with.
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Where necessary for our or a third party's legitimate interests (listed here) and where your interest do not override these interests)?

- To enable us to receive services from our service providers and to enable Citi Companies to provide any service to Citi Companies' business or functions;
- To manage and administer Citi's business, and to manage relationships with you and our service providers;
- To facilitate service provider risk management activities in order to comply with applicable legal, regulatory and compliance requirements (including conducting sanctions screening and reputational checks);
- To communicate with credit reference and information agencies;
- To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity;
- To manage our information technology and to ensure the security of our systems;

- To disclose information to a governmental or regulatory body, court or other third party, when we believe that this is in our, or someone else's interests, but where local law does not require us to make this disclosure;
- To establish, exercise and/or defend legal claims and in order to protect and enforce Citi's rights, property and/or safety, and/or to assist our clients, service providers and/or others to do this; and
- To facilitate service provider risk management activities in order to comply with applicable legal,

YOUR RIGHTS

1. You have the right to be informed about the collection and use of your personal data (*Right to be informed*).
2. You have the right to ask us for a copy of your personal data (*Right to access*).
3. You have the right to ask us to correct or update any inaccurate or outdated information we have about you (*Right to rectification*). For Personal Information protected by the FDPA, you may additionally request that a note of contest is added in case if neither the accuracy nor the inaccuracy of the Personal Information in question can be established.
4. You have the right to ask us to erase/delete your personal data (*Right to be forgotten/Right to erasure*).
5. You have the right to ask us to transfer your data to other data controllers i.e., organizations (*Right to data portability*).
6. You have the right to object to the processing of your personal data (*Right to object*).
7. You have the right to withdraw previously given consent to process your data (*Right to withdraw consent*).
8. You have the right to restrict the processing of your personal data (*Right to restrict processing*).
9. You have the right to object to decisions being made with your data solely based on automated decision making or profiling (*Right to object to automated processing*).
10. You have the right to seek compensation for any material or non-material damage to your data as a result of an infringement of the law(s) in your jurisdiction.
11. You have the right not to be discriminated against for exercising any of your privacy rights.
12. These rights may, depending on the particular right that you are seeking to exercise, be limited in

some situations; for example, where it would infringe the rights of a third party (including our rights), where the personal data is required for the establishment, exercise and/or defense of legal claims, where we can demonstrate that we have legitimate grounds to continue processing your personal data, or where we are not in a position to identify you.

13. Relevant exceptions to and restrictions on your data subject rights are specified in the applicable laws, rules and/or regulation of your jurisdiction. Where required, we may inform you of relevant exceptions that we rely upon when responding to any request that you make. We may also ask you to verify your identity and to provide other details to help us to respond to your request.

If you wish to exercise these rights, you or an authorized agent who has a power of attorney can contact us using the contact details in 'Contact Us' section of this document, or send your data subject requests to: dataprivacyrealestateservices@citi.com If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. We hope that we can satisfy any queries that you may have about the way we process your personal data. However, if you have unresolved concerns you also have the right to complain to the relevant data protection authorities.

Contact Us

If you have any other questions concerning this Privacy Notice, you may submit them to: dataprivacyrealestateservices@citi.com Please do not send emails to us for other purposes. For more details about how we process your personal data, you can contact the responsible Data Protection Officer/Advisor using the following information:

EU/EEA	UK	Switzerland
EU/EEA Data Protection Officer Citi 1 North Wall Quay Dublin D01 T8Y1 Ireland Email GDPRDPO@citi.com	UK Data Protection Officer Citi Citigroup Centre 25 Canada Square London E14 5LB United Kingdom Email: GDPRDPO@citi.com	Swiss Data Protection Advisor Citi Hardstrasse 201 8005 Zurich Switzerland Email: swissdataprotectionadvisor@citi.com

CHANGES TO THE PRIVACY NOTICE

This Notice was last updated on June 13, 2024. If we change this Notice we will place any updated version(s) here: [Citi Real Estate Services Privacy Notice](#). We encourage you to regularly review this Notice to ensure that you are always aware of what personal data we collect, how we use and otherwise process it and under what circumstances we share it with third parties.