



Citi Privacy Statement – China

花旗银行隐私声明-中国

Citi's businesses provide products and services to corporations, financial institutions, public sector organizations and other entities. This Privacy Statement explains how these businesses process personal data (as defined below) about people with whom we (as defined below) come into contact (referred to as "you" in this Privacy Statement) in the course of our dealings with Your Organizations (as defined below). These include employees, officers, directors, beneficial owners and other personnel associated with our clients, service providers and other business counterparties (referred to as "Your Organization" in this Privacy Statement). **In particular, this Privacy Statement has informed you of the processing of sensitive personal data (as defined below) and the cross border transfer of personal data, and you shall be deemed to have given your separate consent to each processing once you have accepted this Privacy Statement or are deemed so.**

花旗银行为公司、金融机构、公共部门组织及其他机构提供产品和服务。本隐私声明解释了我行（如下文定义）在与您的单位（如下文定义）开展业务过程中如何处理与我行接触的人员（下称“您”）的个人信息（如下文定义），其包括我行客户、服务提供商和其他业务相对方（下称“您的单位”）的员工、管理人员、董事、权益所有人和有关联的其他人员。**特别是，本隐私声明已告知您就敏感个人信息（如下文定义）的处理及个人信息跨境传输，一旦您接受本隐私声明或被视为如此，您将被视为已对每次处理均作出单独同意。**

1. Who is responsible for your personal data and how can you contact them?

谁对您的个人信息负责以及您如何联系他们？

Citibank (China) Co., Ltd. Including all of its branches (referred to as "we" in this Privacy Statement) is the processor of your personal data. Under the Personal Information Protection Law of the People's Republic of China (the "PIPL"), a personal data processor refers to an organization or individual that autonomously determines the purposes and means of personal data processing.

花旗银行（中国）有限公司包括其各个分行（下称“我行”）是您个人信息处理者。根据《中华人民共和国个人信息保护法》（“个保法”），个人信息处理者，是指在个人信息处理活动中自主决定处理目的、处理方式的组织、个人。

For more details you can contact CitiService, with the address of Unit 01A&04 of Flr28, Flr29, Flr30, Unit01

of Flr33, Flr34, and Flr35, CitiTower, No.33, Huayuanshiqiao Road, Shanghai, China. Telephone: 800 820 1268 (Only for fixed phones in mainland China) to contact service representatives of CitiService. Outside the country, please call +86 21 6860 4588. Mailbox: china.citisevice@citi.com.

如需了解更多详细信息，您可以联系CitiService，地址为中国上海花园石桥路33号花旗集团大厦主楼28楼01A和04单元、29楼、30楼、33楼01单元、34楼和35楼。电话：800 820 1268（限中国大陆固话拨打）与花旗电话银行的服务专员联系。境外请拨打 +86 21 6860 4588。邮箱：china.citisevice@citi.com。

2. Why do we process your personal data?

我行为什么要处理您的个人信息？

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

出于以下原因，我行为开展业务和达成其他利益等目的，根据需要处理您的个人信息：

- to provide financial products and services to our clients and to communicate with you and/or our clients about them;
为客户提供金融产品和服务，并与您和/或我行的客户进行沟通；
- to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;
为管理、进行和改善我行的业务和与客户和服务提供商的关系，以及用于企业营销、展业和分析目的；
- to monitor and analyze the use of our products and services for system administration, operation, testing and support purposes;
为监测和分析我行的产品和服务以用于系统管理、操作、测试和支持等目的；
- to manage our information technology and to ensure the security of our systems;
为管理我行的信息技术，并确保系统的安全；
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this; and
为建立、行使和/或捍卫法律主张或权利，以及保护我行的财产或安全、行使和执行我行的权利，或协助我行的客户或他人达此目的；及
- to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes.
为调查和回应与我行或我行业务相关的投诉或事件，为保持服务质量，并培训员工处理投诉和纠纷。

We also process your personal data to comply with the PIPL, and related data protection laws, regulations and other binding regulatory documents and requirements (collectively, the “Data Protection Laws”). We sometimes go beyond the strict requirements of the Data Protection Laws, 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:

我行还将根据个保法和相关数据保护法律、法规以及其他具有约束力的规范性文件和要求（统称为“数据保护法律”）处理您的个人信息。有时我行将适用比数据保护法律更加严格的要求，但仅在为追求我行的合法利益而与我行的监管机构和其他有权机关合作、遵守外国法律、防止或监测到金融和其他犯罪和违规行为，以及为保护我行的业务和金融市场的完整性时，其中包括出于以下原因处理您的个人信息：

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third

parties;

为与政府、税务或监管机构、金融市场、经纪人或其他中介机构或交易对手、法院或其他第三方合作、回应其请求、向其报告交易和/或进行其他活动；

- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);

为风险评估和控制目的（包括发现、预防和调查欺诈）监测和分析我行产品和服务的应用；

- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. This includes know your customer (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’ (PEPs) 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

为开展合规活动，如审计和报告、评估和管理风险、维护会计和税务记录、预防欺诈和反洗钱（AML），为采取与制裁和反恐法律法规以及打击犯罪有关的措施。这包括了解您的客户（KYC）筛查（包括身份检查、验证地址和联系方式）、政治人员筛查（作为客户尽职调查和建立客户关系的一部分，包括根据内部和外部数据库筛查客户记录，以建立与“政治人员”（PEPs）的联系）和制裁筛查（涉及根据公布的制裁名单筛查客户及其代表）；及

- 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 Data Protection Laws, these recordings are our sole property.

为记录和/或监控电话通话，以保持服务质量和安全；为员工培训和欺诈监控，并处理投诉、纠纷以及潜在的和/或实际的犯罪活动。在数据保护法律允许的范围内，这些录音为我行的专有财产。

We rely on consent as the legal basis for processing your personal data, unless otherwise provided by Data Protection Laws, in which case we may not rely on your consent to process your personal data. 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 otherwise do business with you or Your Organization.

我行依赖您的同意作为处理您的个人信息的法律依据，但在数据保护法律另有规定的情况下，我行可不依赖您的同意来处理您的个人信息。如果您未提供我行要求的信息，我行可能无法向您或您的单位提供（或继续提供）相关产品或服务，或将以其他方式与您或您的单位开展业务。

In order to provide you or Your Organization with more accurate, personalized, smooth and convenient services, or to help us evaluate, improve or design products, services and operational activities, to the extent permitted by Data Protection Laws, we may anonymize or de-identify your personal data via technology means, and conduct comprehensive statistics, analysis and processing. We may use such de-identified or anonymized data for various business purposes, but your personal data will not be disclosed as such data, which is not personal data once anonymized, will neither be able to be used to identify the data subject or possible to restore.

为向您或您的单位提供更加准确、个性、流畅及便捷的服务，或帮助我行评估、改善或设计产品、服务及运营活动等，在数据保护法律允许的范围内，我行可能通过技术手段对您的信息进行匿名化或去标识化，并进行综合统计、分析加工。我行可能将该等去标识化或匿名化的信息用于各种业务用途，但由于该等信息无法识别信息主体且不能复原，一经匿名化不属于个人信息，因而您的个人信息不会因此被泄露。

3. Where does Citi obtain personal data about you?

花旗银行在哪里获取您的个人信息？

We process personal data that you provide to us directly, or that we learn about you from your use of our systems or our communications or other dealings with you or Your Organization or otherwise third parties. Your Organization will also give us some personal data about you. "Personal data" means all kinds of data related to you being identified or identifiable which is recorded by electronic or other means, excluding any data processed anonymously. This may include your date of birth, title and job description, contact details such as your business email address, physical address and telephone number and other information required for KYC, AML and/or sanctions checking purposes (e.g., copies of your passport or a specimen of your signature). We also obtain some personal data about you from international sanctions lists, publically available websites, databases and other public data sources.

我行处理您直接提供给我行的，或者因您使用我行的系统或我行与您或您的单位的通讯或其他往来中或自其他第三方获取的个人信息。您的单位还将向我行提供一些关于您的个人信息。“个人信息”是指以电子或者其他方式记录的与您作为已识别或者可识别的人士有关的各种信息，不包括匿名化处理后的信息。这些信息可能包括您的出生日期、职位和职位描述、联系方式，如您的企业电子邮件地址、实体地址和电话号以及KYC、AML和/或制裁检查所需的其他信息（例如，护照复印件或签名样本）。我行还将从国际制裁列表、公开网站、数据库和其他公共数据源获取一些关于您的个人信息。

4. To whom do we disclose your personal data?

我行向谁披露您的个人信息？

We disclose your personal data, for the reasons set out in Section 2, as follows:

出于第2节规定的原因，我行向以下各方披露您的个人信息：

- to Your Organization in connection with the products and services that we provide to it if Your Organization is our client, or otherwise in connection with our dealings with Your Organization;

如您的单位是我行的客户或以其他方式与我行进行交易的，就我行向您的单位提供的产品和服务向您的单位提供；

- to other Citi entities for the purpose of managing Citi's client, service provider and other business counterparty relationships. For the cross border transfer of personal data hereunder, please see Section 5 for details;

为管理花旗的客户、服务提供商和其他业务相对方的关系向其他花旗实体提供。有关个人信息的跨境传输，详情请参阅第5节；

- to counterparty banks, payment infrastructure providers and other persons from whom we receive, or to whom we make, payments on our clients' behalf;

向交易对手银行、支付基础设施提供商和我行代表客户与其进行收付款的其他人提供；

- to export credit agencies, multilateral agencies, development finance institutions, other financial institutions, governmental authorities and their agents, insurers, due diligence service providers and credit assessors, in each case in connection with the products and services that we provide to Your Organization if Your Organization is our client, including in connection with financings;

如果您的单位是我行的客户，就为您的单位提供的产品和服务（包括与融资相关的产品和服务）向出口信贷机构、多边机构、发展金融机构、其他金融机构、政府机构及其代理人、保险公司、尽职调查服务提供商和信用评估员提供；

- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services;

向提供应用程序处理、欺诈监测、呼叫中心和/或其他客户服务、托管服务和其他技术和业务流程外包服务的服务提供商提供；

- to our professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);

向我行的专业服务提供商（如法律顾问、会计师、审计师、保险公司和税务顾问）提供；

- to legal advisors, government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings;

向参与或准备诉讼的法律顾问、政府和执法部门以及其他人员提供；

- to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals;

向主管监管、检察部门、税务或政府机构、法院或其他法庭提供;

- to other persons where disclosure is required by Data Protection Laws or to enable products and services to be provided to you or our clients; and

向数据保护法律要求披露的, 或能够向您或我行的客户提供产品和服务的其他人提供;和

- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets.

作为出售、合并或其他处置我行任何业务或资产的一部分, 向潜在买家提供。

5. Where do we transfer your personal data?

您的个人信息将会传输到哪里?

In principle, the personal data will be stored within the People's Republic of China (for the purpose of this Privacy Statement excluding Hong Kong, Macau and Taiwan, the "PRC"). However, as part of Citi's Global Group presence, we provide products and services through resources and servers located around the world. The personal data may, with your consent or other legal justifications, be transferred to, or accessed from our parent, affiliates and/or relevant service providers in offshore jurisdictions. Such personal data will be protected by confidentiality and security measures of us and of the recipients in accordance with applicable laws and regulations. Please see the table accessible at <https://www.citi.com.cn/html/cn/pdf/jgkhyw.pdf> for the name, contact information, and types of personal data to be transferred or accessed from offshore, the processing measures and purposes as well as the method and procedure for you to exercise the rights against the overseas recipients. **According to Data Protection Laws, we will inform you of the overseas recipient's name and contact information, the purposes and means of processing, the categories of personal data to be processed, as well as the methods and procedures for you to exercise your rights as provided in Data Protection Laws over the overseas recipient, etc., and shall obtain your separate consent thereof. This Privacy Statement has informed you in this regard, and your acceptance to this Privacy Statement shall be deemed as your separate consent to such processing.**

原则上, 我行将个人信息存储在中华人民共和国(为本隐私声明之目的, 不包括香港、澳门及台湾, 下称“中国”)境内。但是, 作为花旗全球集团的一部分, 我行通过遍布全球的资源和服务提供产品或服务。为办理金融业务的需要, 在获得您的同意后或在法律法规有明确规定的情况下, 个人信息可能转移到我行的母行、关联机构及相关服务供应商所在的境外管辖区, 或者受到来自这些管辖区的访问。该等个人信息将受到我行和接收方根据适用法律法规所采取的保密和安全措施的保护。请参阅本隐私政策所附的境外接收方列表境外接收方的名称、联系方式、出境数据的种类、方式及目的、您行使个人信息主体权利的方式及程序请见 <https://www.citibank.com.cn/rcs/citi-china/storage/public/BusinessInformationandServices/CH/BusinessInformationandServices/jgkhyw.pdf>。

根据数据保护法律, 我行将告知您境外接收方的名称或者姓名、联系方式、处理目的、处理方式、个人信息的种类以及您向境外接收方行使数据保护法律规定权利的方式和程序等事项, 并取得您的单独同意。本隐私声明已告知您我行由此对个人信息的处理, 您对本隐私声明的接受将被视为您对此类处理的单独同意。

6. When we collect your sensitive personal data?

我行何时收集您的敏感个人信息?

For the purposes stated in Section 1, we may collect your sensitive personal data amongst other personal data. "Sensitive personal data" means personal or property data that, once leaked or illegally provided or misused, may harm personal or property safety and will easily lead to infringement of the personal reputation, human dignity, physical or psychological health, or discriminatory treatment. Sensitive personal data mainly includes ID certificate data (ID card, passport and etc.), personal biometrics recognition data, credit data, property data, transaction data, medical and health data, specific identity, financial account, individual location tracking etc. as well as any personal data of a minor under the age of 14. We collect your sensitive personal data strictly following the principle of minimum and necessity. **According to Data Protection Laws, we will inform you of the purposes and methods of processing and other matters that need to be informed regarding your sensitive personal data collected by us, and seek your separate consent thereof. This Privacy Statement has informed you of our processing of your sensitive personal data, and your acceptance to this Privacy Statement shall be deemed as your separate consent to such processing.**

出于第1节所述目的, 我行可能会收集其他个人信息以外的您的敏感个人信息。“敏感个人信息”是指一旦泄露、非法提供或使用可能损害人身或财产安全并容易导致个人声誉、人格尊严、身心健康受到损害或歧视性待遇的个人或财产信息。敏感个人信息主要包括身份证件信息(身份证、护照等)、个人生物识别信息、信用信息、财产信息、交易信息、医疗健康信息、特定身份、金融账户、个人行踪轨迹等信息, 以及不满十四周岁未成年人的任何个人信息。我行严格按照最小必要原则收集您的敏感个人信息。根据数据保护法律, 我行将告知您我行处理您的敏感个人信息的目的和方法以及其他需要告知的事项, 并据此寻求您的单独同意。本隐私声明已告知您我行对于您的敏感个人信息的处理, 您对本隐私声明的接受将被视为您对此类处理的单独同意。

7. How do we protect your personal data?

我行如何保护您的个人信息?

We have used industry-standard security measures to protect the personal data to prevent unauthorized access, public disclosure, use, modification, damage or loss of data. We will take all reasonable and feasible action to protect your personal data. We will take all reasonable and feasible measures to ensure that no irrelevant personal data is collected. If our physical, technical, or administrative

protection is damaged, which results in unauthorized access, public disclosure, alteration, or destruction of information and further impairs your legitimate right, we would undertake corresponding legal liabilities. In the occurrence of any personal data security incident, we will promptly notify you of the following in accordance with Data Protection Laws: basic information about the security incident and its potential impact, treatment measures we have taken or will take, suggestions about proactive defense and risk mitigation, remedial measures and etc. We will promptly let you know relevant situations of the incident by means of mail, letter, phone call and etc. We will issue announcement in a reasonable and effective manner when having difficulty in reaching out to each personal data subject. Meanwhile, we will also report the handling status of personal data security incidents as required by regulatory authorities.

我行已使用符合业界标准的安全防护措施保护个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我行会采取一切合理可行的措施，保护您的个人信息。我行会采取一切合理可行的措施，确保未收集无关的个人信息。如果我行的物理、技术、或管理防护设施遭到破坏，导致信息被非授权访问、公开披露、篡改、或毁坏，导致您的合法权益受损，我行将承担相应的法律责任。在不幸发生个人信息安全事件后，我行将按照数据保护法律的要求，及时向您告知：安全事件的基本情况 and 可能的影响、我行已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我行将及时将事件相关情况以邮件、信函、电话等方式告知您，难以逐一告知个人信息主体时，我行会采取合理、有效的方式发布公告。同时，我行还将按照监管部门要求主动上报个人信息安全事件的处置情况。

8. How long do we keep your personal data?

我行将保存您的个人信息多长时间？

We keep your personal data for as long as is necessary for the purposes of our relationship with you or Your Organization or in connection with performing an agreement with a client or Your Organization or complying with a legal or regulatory obligation.

为了维护我行与您和您的单位的关系、履行与客户或您的单位的协议或遵守法律或监管义务等相关目的，我行将在必要的时间内限度内保存您的个人信息。

9. What are your rights in relation to personal data?

您对于个人信息享有什么权利？

You shall have the right to be informed, the right to make decisions on the processing of your personal data, and the right to restrict or refuse the processing of your personal data by us, except as otherwise provided by Data Protection Laws. You can ask us to: (i) inquire your personal data; (ii) provide you with a copy of your personal data; (iii) correct or supplement your personal data; (iv) erase your personal data; (v) restrict our processing of your personal data; or (vi) transfer your personal data to a designated personal data processor which meets the requirements of national cyberspace administration for transferring personal data. You

have the right to request us to interpret the personal data processing rules.. These rights will be limited in some situations; for example, where we are otherwise required to process your personal data or cannot respond to the requests from you or Your Organization according to Data Protection Laws. Please understand that in order to ensure the security, we may need to verify your identity before processing your request. For those requests that are illegal, noncompliant, unreasonably repetitive which need too excessive technical means, pose risks to others' legitimate rights and interests, or are very impractical, we may reject such requests.

您对个人信息的处理享有知情权、决定权，有权限制或者拒绝我行对个人信息进行处理，数据保护法律另有规定的除外。您可以要求我行：(i) 查询您的个人信息；(ii) 提供您的个人信息；(iii) 更正或补充您的个人信息；(iv) 删除您的个人信息；(v) 限制我行处理您的个人信息；或 (vi) 符合国家网信部门规定条件的，将您的个人信息转移至指定的个人信息处理者。您有权要求我行对个人信息处理规则进行解释说明。在某些情况下，这些权利将受到限制，例如数据保护法律另行要求我行在某些情况下如此处理您的个人信息或无法回复您或您的单位的请求。请理解，为了确保安全，我行可能需要在处理您的请求之前验证您的身份。对于非法、不合规、不合理重复且需要过多技术手段、对他人合法权益构成风险或非常不切实际的请求，我行可以拒绝此类请求。

You have the right to change the scope of consent or withdraw your consent and/or separate consent, and exercise your rights in accordance with this section, however this may cause that we may not be able to enter into or perform a legal agreement or document with, or provide (or continue providing) the relevant financial services to, or otherwise initiate or maintain a business relationship with Your Organization. We will not further process the related personal data once you change or cancel your consent and/or separate consent unless otherwise permitted by the Data Protection Laws. Please note the change or withdrawal of your consent and/or separate consent will not affect the lawfulness of processing based on your consent and/or separate consent before the change or withdrawal.

您有权改变同意的范围或撤回您的同意和/或单独同意，并根据本节行使您的权利，但这可能导致我们无法与您的单位签订或履行法律协议或文件，或向您的单位提供（或继续提供）相关的金融服务，或以其他方式与您的单位建立或维持业务关系。除非数据保护法律另行允许，一旦您改变或撤回您的同意和/或单独同意，我们将不会进一步处理相关的个人信息。请注意，变更或撤回您的同意和/或单独同意不会影响在变更或撤回之前基于您的同意和/或单独同意进行的处理的合法性。

To exercise these rights or if you have questions about how we process your personal data, please contact us using the contact details in Section 1. We can in particular, provide copies of the data transfer safeguards referred to in Section 5. You can also complain to the relevant data protection authorities in the PRC where you live or work or where the alleged infringement of Data Protection Laws occurred.

如需行使这些权利或您对我行如何处理您的个人信息有任何

疑问，请使用第1节中的联系方式联系我行。我行可以特别提供第5节中提到的数据传输保障措施。您也可以向您居住、工作或涉嫌违反数据保护法律的行为发生地的中国数据保护机构进行投诉。

10. Changes to this Privacy Statement

隐私声明的修改

This Privacy Statement takes effect on July 1st, 2023; it was

last updated on Jun 30th, 2023. If we change it, to keep you fully aware of our processing of your personal data and related matters, we will post the new version to this website.

本隐私声明于 2023年7月1日生效,最新更新于2023年6月30日。如果我行更改此隐私声明,会将新版本发布到本网站,以便让您充分了解我行处理您的个人信息和相关事项。

Citi Privacy Statement - China_v.1.3 July 2023

花旗银行隐私声明-中国_v.1.3_2023年7月

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