

## To Whom It May Concerns:

敬启者：

Pursuant to the Personal Information Protection Law of the People's Republic of China and other relevant laws and regulations, this consent letter (the "**Letter**") is hereby issued to inform you of, and obtain your separate consent for, the cross-border transfer of personal information generated from your communications on the Tencent WeChat platform with Relationship Managers and/or Bankers of relevant Citigroup entities (collectively referred to as "**Citi**") via the WeCom account registered by Citi's affiliate, Citigroup Services and Technology (China) Limited ("**CSTC**") in accordance with the Citi WeChat Terms of Use. By providing this separate consent, you expressly agree that CSTC, Citibank China Company Limited (as it relates to banking business) and the relevant overseas recipients of Citi may carry out the cross-border transfer of your relevant personal information.

根据《中华人民共和国个人信息保护法》及其他相关法律法规，本同意函（以下简称“本函”）旨在就您在使用腾讯微信平台与相关花旗集团实体（合称“花旗”）的客户经理以及/或银行工作人员根据花旗微信通讯服务条款，通过由花旗关联方花旗金融信息服务（中国）有限公司（“**CSTC**”）注册的企业微信账号进行通讯过程中产生的个人信息跨境转移一事，向您告知相关事项并征得您对的单独同意。通过作出本单独同意，您明确同意 CSTC、花旗银行（中国）有限公司（若与银行业务相关）和相关花旗境外数据接收方可开展您相关个人信息的跨境传输活动。

## 1 Basic Information on Cross-Border Data Transfer

### 一、跨境数据传输基本信息

#### (a) Overseas Data Recipients

##### 1. 境外数据接收方

Citi Overseas Data Recipient may include Citi's overseas affiliated entities and overseas compliance and archiving systems, including namely, Citigroup Technology Infrastructure (Hong Kong) Limited, located in Hong Kong. Subsequently, the data will be sub-transferred to Citibank N.A., with headquarters located in New York City, USA.

花旗境外数据接收方可能包括花旗的境外关联实体及境外合规与归档系统，具体包括：位于香港的花旗技术基建（香港）有限公司。随后，相关数据将被再传输至总部位于美国纽约的花旗银行。

We ensure data protection standards are met either by executing the Standard Contractual Clauses (SCC) formulated by the Cybersecurity Administration of China or filing the Security Assessment application to the same, as applicable.

我们通过签署中华人民共和国国家互联网信息办公室制定的标准合同条款或向其申请数据出境安全评估（如适用）来确保满足数据保护标准。

## **(b) Contact Information**

### 2. 联系方式

[CLIENTSERVICE.CTIHK@CITI.COM](mailto:CLIENTSERVICE.CTIHK@CITI.COM)

## **(c) Data Processing Purpose**

### 3. 数据处理目的

As a global financial institution, Citi is subject to applicable laws and requirements including anti-money laundering, risk management, audit and other requirements imposed by regulators in multiple jurisdictions. The transferred data is ingested, transferred and archived for the purpose of complying with Citi's internal compliance obligations and policies, including monitoring and surveillance, to comply with applicable legal and regulatory obligations. It is essential for financial institutions such as Citi to maintain supervision and review of all communications, as this is required to identify potential misconduct such as insider trading or market misconduct and to enable Citi to maintain sound risk management and internal control frameworks. Such data transfers are limited to the minimum scope necessary to achieve these purposes and are conducted in accordance with the principle of necessity and proportionality.

作为一家全球性金融机构，花旗须遵守适用法律和要求，包括多个司法管辖区监管机构施加的反洗钱、风险管理、审计及其他要求。所传输的数据被收集、传输并归档，目的是遵守花旗的内部合规义务和政策，包括合规监控和审查，以符合适用的法律和监管义务。对如花旗此类金融机构而言，对所有通讯进行合规监督和审查至关重要，因为这是识别潜在不当行为（如内幕交易或市场失当行为）的必要手段，并使花旗能够维持健全的风险管理和内部控制架构。此类数据传输仅限于实现该等目的所必需的最小范围，并遵循必要性和比例原则进行。

- (i) **Operational Resilience:** Robust surveillance frameworks, specifically encompassing the monitoring of electronic communications such as chat records, are imperative for Citi to effectively identify, deter, and prevent employee misconduct and regulatory non-compliance. The absence of such comprehensive oversight directly exposes the financial institution to exacerbated compliance vulnerabilities and an elevated risk profile. Critically, any impediment to accessing these essential communication records could precipitate significant institutional repercussions and penalties, particularly given that the U.S. parent entity operates within a highly regulated environment demanding consistent and unified internal compliance adherence.

- (1) **运营韧性：**健全的监控框架，特别是涵盖对聊天记录等电子通讯的监控，对于花旗有效识别、阻止和防范员工不当行为及监管违规行为至关重要。缺乏此类全面监督将直接导致该金融机构面临加剧的合规漏洞和更高的风险状况。关键在于，任何妨

碍获取这些必要通讯记录的行为都可能引发重大的机构后果和处罚，特别是考虑到美国母公司在高度受监管的环境中运营，要求遵守一致且统一的内部合规标准。

- (ii) **Regulatory Compliance:** Regulations of jurisdictions where Citi operates mandate that all records be maintained in a true, complete, and immutable format, specifically non-rewritable and non-erasable, or alternatively, within a time-stamped audit-trail that ensures prompt accessibility.
- (2) **监管合规：**花旗经营所在地司法辖区的法规要求所有记录必须以真实、完整且不可更改的格式保存，具体而言，应为不可重写和不可擦除的格式，或者，保存在带有时间戳的审计跟踪系统中，确保能够及时访问。
- (iii) **Usage Restriction:** Please be assured that the archived data is strictly limited to legal, regulatory, and internal quality assurance purposes. It will NOT be used for marketing, user profiling, or any other unrelated commercial purposes.
- (3) **用途限制：**敬请放心，归档数据严格限于法律、监管和内部质量保证目的。不会用于营销、用户画像或任何其他无关的商业目的。

#### **(d) Data Processing Method**

##### **4. 数据处理方式**

The following section details Citi's robust and controlled protocol for the lifecycle management of electronic communications data, specifically pertaining to WeCom/WeChat, in furtherance of its regulatory reporting obligations and internal compliance framework.

以下章节详细说明了花旗为履行其监管报告义务和遵守内部合规框架，针对电子通讯数据（特别是与企业微信/微信相关的数据）全生命周期管理所采取的稳健且受控的数据处理方式。

- (i) **Data Collection:** Citi systematically collects WeCom/WeChat conversation data through a designated and authorized third-party vendor. This vendor is mandated to retrieve the data directly from the Tencent WeCom platform utilizing Tencent's proprietary Application Programming Interface (API). All collection activities are executed in strict adherence to Citi's precise instructions and established technical specifications, thereby ensuring data integrity and an auditable chain of custody from the point of origin.
- (1) **数据收集：**花旗通过一家指定且经授权的第三方供应商系统性地收集企业微信/微信对话数据。该供应商被授权利用腾讯专有的应用程序编程接口直接从腾讯企业微信平台获取数据。所有收集活动均严格遵守花旗的明确指示和既定技术规范执行，从而确保数据完整性以及从源头开始的可审计的监管链。

- (ii) Data Storage: WeCom/WeChat data will first be securely provisioned to a dedicated data center located in Hong Kong. This interim storage serves the singular, explicit purpose of facilitating its secure and efficient transmission.
- (2) 数据存储：企业微信/微信数据将首先安全地预置到位于香港的专用数据中心。此临时存储的唯一明确目的是促进其安全高效地传输。
- (iii) Data Use: Citi employs the processed WeCom/WeChat data to discharge its mandated internal compliance obligations and to uphold its internal policies and procedures. This scope of use encompasses, but is not limited to, proactive communication monitoring, comprehensive surveillance activities, and the imperative to ensure stringent adherence to all applicable laws and regulations. It is critical to note that the integrity of the original data is preserved, remaining unaltered, and is not utilized for any purpose tangential or unrelated to Citi's legitimate compliance requirements.
- (3) 数据使用：花旗将处理后的企业微信/微信数据用于履行其规定的内部合规义务和维护其内部政策与程序。此使用范围包括但不限于主动的通讯监控、全面的监督活动以及确保严格遵守所有适用法律和法规的必要措施。关键之处在于，原始数据的完整性得以保留，保持不变，且不会用于与花旗正当的合规要求无关或次要的任何目的。
- (iv) Data Processing: All data processing activities are conducted in full conformance with Citi's records management policies and all relevant data retention policies. In instances where predefined escalation events are triggered, Citi rigorously adheres to its established internal compliance escalation model, initiating further appropriate processing, review, and action.
- (4) 数据处理：所有数据处理活动均完全符合花旗的记录管理政策和所有相关数据保留政策。在触发预定义的升级报告事件时，花旗严格遵守其既定的内部合规监控升级报告模式，启动进一步的处理、审查和行动。
- (v) Data Transmission: The transmission pathway for relevant WeCom/WeChat data is executed through a secure process, aligned with industry security standards. Data is initially transferred from the WeCom platform within mainland China to an Internet Content Provider (ICP) validated proxy service, also situated in China. Following this secure transit, the data is transmitted to the aforementioned Hong Kong data center. Subsequently, the data will be sub-transferred to Citibank N.A., with headquarters located in New York City, USA.
- (5) 数据传输：相关企业微信/微信数据的传输路径通过符合行业安全标准的安全流程执行。数据首先从中国大陆境内的微信平台传输至同样位于中国的、经互联网内容提供商验证的代理服务。在此安全传输之后，数据被发送至前述的香港数据中心。随后，相关数据将被再传输至总部位于美国纽约的花旗银行。

- (vi) **Data Provision:** Citi retains absolute and exclusive control over the provision of this data to any external third party. Under no circumstances is any third party authorized to disclose, disseminate, or provide this data to another entity without Citi's explicit, documented, and prior written instruction. This stringent control mechanism ensures that all data sharing is rigorously managed, authorized, and auditable at the highest internal level.
- (6) **数据提供：**花旗保留向任何外部第三方提供此数据的绝对且排他性的控制权。在任何情况下，未经花旗明确、书面记录且事先的书面指示，任何第三方均无权向另一实体披露、传播或提供此数据。这一严格的控制机制确保所有数据共享都在最高内部层面得到严格管理、授权和审计。
- (vii) **Data Deletion:** WeCom/WeChat data temporarily residing in interim storage, prior to its successful ingestion into Citi's U.S. data centers, is subject to a maximum retention period of 365 days. Upon the expiration of this defined period, the data is systematically and irrevocably deleted from such interim storage.
- (7) **数据删除：**临时存储中的企业微信/微信数据，在成功导入花旗美国数据中心之前，其最长保留期限为 365 天。在此规定期限届满后，数据将从临时存储中系统性且不可撤销地被删除。

#### **(e) Type of Personal Information**

##### **5. 个人信息种类**

Including but not limited to Client/user's WeChat username, WeChat ID, WeChat profile picture, WeChat chatroom, date and time of message sent, and message content provided by you during communications.

包括但不限于您在通讯过程中提供的客户的微信用户名、微信 ID、微信头像、群聊名称、消息发送日期和时间以及消息内容。

Please note that, the chat content may contain **Sensitive Personal Information** such as your and/or relevant individuals' **bank account number, deposit information (including amount, payment/receipt records), ID card photos or passport photos**. Unauthorized access or leakage could result in financial fraud, identity theft, or compromised privacy. To mitigate such risks, we utilize industry standard encryption mechanisms such as Advanced Encryption Standards (AES) to encrypt the data stored and Transport Layer Security (TLS) 1.2 to provide secure communications for all connectivity across systems. All information at Citi is classified according to its content, which determines access, authentication, encryption standards, handling and control requirement in order to be properly protected, which adheres to Citi Information Security Standard. Citi will also retain the data following Citi's records management policies.

请注意，聊天内容可能包含您及/或相关人士的敏感个人信息，例如银行账号信息、存款信息（包括资金数量、支付收款记录）、居民身份证照片或护照照片。未经授权的访问或泄露可能导致金融欺诈、身份盗用或隐私受损。为降低此类风险，我们采用行业标准的加密机制，例如采用高级加密标准（AES）对存储数据进行加密，并采用传输层安全性协议（TLS）1.2 版为所有系统间连接提供安全通信。花旗的所有信息均根据其内容进行分类，以确定访问权限、身份验证、加密标准、处理和um控制要求，从而确保得到适当保护，这符合花旗信息安全标准。花旗亦将根据花旗的记录管理政策保留数据。

## **(f) Method and Procedure to Exercise Rights**

### **6. 权利行使方式及流程**

Please be informed that, as we rely on the PRC Standard Contractual Clauses (SCC) for the cross-border transfer of your and/or relevant individuals' personal information, you and/or relevant individuals are designated as a third-party beneficiary under the SCC executed between us and the Overseas Recipient(s). If you and/or relevant individuals do not explicitly reject this designation within thirty days, you and/or relevant individuals shall be entitled to exercise the rights of a third-party beneficiary in accordance with the SCC.

特此告知，由于我们依据中华人民共和国标准合同条款进行您及/或相关人士的个人信息跨境转移，您及/或相关人士被指定为我们与境外接收方之间签署的标准合同条款项下的第三方受益人。若您及/或相关人士在三十日内未明确拒绝此指定，您及/或相关人士将有权根据标准合同条款行使第三方受益人的权利。

Matters not covered in this letter, including personal information processing rules, rights and obligations, and method and procedure to exercise those rights, shall be subject to Citi's Personal Information Protection Policy (for Citi WeCom). You may refer to the Appendix to this letter for details.

本函未涉及的事宜，包括个人信息处理规则、权利和义务以及行使这些权利的方式和程序，应遵守花旗个人信息保护政策（适用于花旗企业微信）。具体内容，敬请阅读本函附件。

Depending on your actual wealth management service provider, you may exercise your rights directly against the Overseas Recipient via the channels below and contact your Relationship Managers and/or Bankers of Citi: [CLIENTSERVICE.CTIHK@CITI.COM](mailto:CLIENTSERVICE.CTIHK@CITI.COM)

根据您的实际财富管理服务提供商，您可通过以下渠道直接向相应的境外接收方行使您的权利或联系您的花旗客户经理以及/或银行工作人员：[CLIENTSERVICE.CTIHK@CITI.COM](mailto:CLIENTSERVICE.CTIHK@CITI.COM)

## **2 Consent and Acknowledgement**

### **二、同意与确认**

- I have fully read and clearly understood all the contents of this letter (including the Citi's Personal Information Protection Policy (for Citi WeCom), which constitutes an integral part of this letter), and am aware of the purpose, scope, overseas recipients and

relevant rights and obligations of the cross-border transfer of personal information. I voluntarily, explicitly and separately consent to Citi transferring the relevant personal information of myself generated from communications via WeCom/WeChat to overseas recipient Citigroup Technology Infrastructure (Hong Kong) Limited and Citibank, N.A., and Citi processing such information in accordance with applicable laws and Citi's Personal Information Protection Policy (for Citi WeCom).

- 本人已完整阅读并清晰理解本函（包括花旗个人信息保护政策（适用于花旗企业微信），其构成本函不可分割的组成部分）的全部内容，知悉个人信息跨境转移的目的、范围、境外接收方及相关权利义务。本人自愿、明确且单独地同意花旗将本人通过企业微信/微信通讯产生的相关个人信息转移至境外接收方花旗技术基建（香港）有限公司与花旗银行，并由花旗根据适用法律及花旗个人信息保护政策（适用于花旗企业微信）处理该等信息。
- (If applicable) I undertake that, regarding any personal information of other individuals that I provide to Citi in the course of communicating with Citi via WeCom/WeChat, I have duly informed such individuals of the purposes, scope and related rights concerning Citi's processing and cross-border transfer of such personal information, and have obtained their separate consent in accordance with applicable laws.
- （如适用）本人承诺，就本人在通过企业微信/微信与花旗进行通讯过程中向花旗提供的其他自然人的个人信息，本人已依法将花旗处理及跨境转移该等信息的目的、范围及相关权利告知该等人员，并已取得其单独同意。
- I acknowledge that: I may withdraw this consent at any time, however, such withdrawal shall not affect the legality of the personal information processing activities conducted prior to the withdrawal.
- 本人确认：本人可随时撤回此同意，且该等撤回不影响此前已开展的个人信息处理活动的合法性。

## APPENDIX: CITI'S PERSONAL INFORMATION PROTECTION POLICY (FOR CITI WECOM)

附件：花旗个人信息保护政策（适用于花旗企业微信）

# Personal Information Protection Policy

[For Citi WeCom]

## 个人信息保护政策

[适用于花旗企业微信]

The Personal Information Protection Policy ("**this Policy**") applies only to individuals based in The People's Republic of China (referred to here in this Policy as "**China Data Subject**" or "**you**" or "**your**") who use the Tencent WeChat platform ("**Communication Platform**") to communicate with Relationship Managers and/or Bankers of Citibank (Hong Kong) Limited, Citibank (Singapore) Limited, Citibank, N.A., Hong Kong Branch (organized under the laws of U.S.A. with limited liability) and/or Citibank N.A Singapore Branch, and other Citigroup entities (collectively referred to as "**Citi**" or "**We**") in accordance with the Citi WeCom Terms of Use ("**Citi Terms**").

本个人信息保护政策（以下简称“本政策”）仅适用于在中华人民共和国境内（为本政策之目的，不包括香港、澳门、台湾地区，以下简称“中国”）的个人（在本政策中称“中国数据主体”或“您”）根据花旗企业微信使用条款（以下简称“花旗条款”）使用腾讯微信平台（以下简称“通讯平台”）与花旗银行（香港）有限公司、花旗银行（新加坡）有限公司、花旗银行香港分行（根据美国法设立承担有限责任）、花旗银行新加坡分行和其他花旗集团实体（合称“花旗”或“我们”）的客户经理及/或银行工作人员（以下简称“花旗”或“我们”）进行通讯的情形。

Please carefully read this Policy and ensure you understand that we will handle your personal information in accordance with the principles of clear purpose, consistency of rights and responsibilities, minimization & necessity and security. If you have any questions, please contact your banker for further assistance or send an email to the following email addresses or call the designated hotlines below.

请您仔细阅读本政策，并确保您理解我们将依照目的明确、权责一致、最少必要、确保安全的原则处理您的个人信息。如您有任何疑问，请联系您的客户经理以获取进一步帮助，或发送邮件至以下电子邮件地址或拨打以下指定热线电话。

SG Citigold & Citi Private Client (CG-CPC (新加坡花旗金卡及花旗私人财富管理客户): customerservice@citibank.com.sg and

customerservice@info.ipb.citibank.com.sg (International Personal Bank Clients / 国际私人银行)

HK CG-CPC (香港花旗金卡及花旗私人财富管理客户) hotline 热线电话: +852 2860 0111

APAC CPB (亚太花旗私人银行客户): cpbclientenquiry@citi.com

This Policy will help you understand the following:

本政策将帮助您了解以下内容:

1. How we may collect and use your personal information
2. How we may conduct entrusted processing of, share, transfer, and publicly disclose your personal information
3. How we store and protect your personal information
4. Your rights
5. How we protect the information of children or minors
6. How your personal information is transferred globally
7. How we update this Policy
8. How to contact us
9. Miscellaneous
  1. 我们如何收集和使用您的个人信息
  2. 我们如何委托处理、共享、转让和公开披露您的个人信息
  3. 我们如何存储和保护您的个人信息
  4. 您的权利
  5. 我们如何保护儿童和未成年人信息
  6. 您的个人信息如何在全球范围转移
  7. 本政策如何更新
  8. 如何联系我们
  9. 其他

We understand the importance of personal information to you and will do our utmost to protect your personal information. We are committed to abide by the following principles to protect your personal information: the principle of consistency of rights and responsibilities, the principle of clear purpose, the principle of minimization & necessity, the principle of security, the principle of subject participation, the principle of openness and transparency, etc. At the same time, we promise that we will take appropriate security measures to protect your personal information in accordance with the industry's mature security standards.

我们深知个人信息对您的重要性，并会尽全力保护您的个人信息。我们恪守以下原则保护您的个人信息：权责一致原则、目的明确原则、最小必要原则、确保安全原

则、主体参与原则、公开透明原则等。同时，我们承诺，我们将按业界成熟的安全标准，采取相应的安全保护措施来保护您的个人信息。

Please read and understand this Policy carefully before using the Communication Platform.

在使用通讯平台前，请仔细阅读并理解本政策。

For the clauses on personal sensitive information in this Policy that we consider to be materially related to your rights and interests, we've marked them in bold to draw your special attention.

对于本政策中我们认为与您的权益存在重大关系的条款以及个人敏感信息，我们采用粗体字进行标注以提示您特别注意。

The terms listed below shall have the meaning designated:

下列术语具有以下含义：

**Personal information** refers to various information recorded electronically or otherwise that can identify a specific natural person or reflect the activity of a particular natural person, either alone or in combination with other information.

**个人信息**是指以电子或其他方式记录的能够单独或与其他信息结合识别特定自然人身份或反映特定自然人活动情况的各种信息。

The Personal information may include: Personal Identity Information (ID card, military officer ID, passport, driver's license, work permit, access permit, social security card, residence permit, etc.), Personal Property Information (Bank accounts, authentication information (passwords), deposit information (including amount, payment/receipt records, etc.), property information, credit records, credit information, transaction and consumption records, transaction history, etc., as well as virtual currency, virtual transactions, game redemption codes, and other virtual property information.), Personal Communication Information (Communication records and content, SMS, MMS, emails, and data describing personal communication (commonly referred to as metadata), etc.), and Network Identification Information (account of personal information subject, IP address, and personal digital certificate, etc.)

个人信息可能包括：个人身份信息（身份证、军官证、护照、驾驶证、工作证、出入证、社保卡、居住证等）、个人财产信息（银行账户、鉴别信息（口令）、存款信息（包括资金数量、支付收款记录等）、财产信息、信贷记录、征信信息、交易和消费记录、流水记录等，以及虚拟货币、虚拟交易、游戏类兑换码等虚拟财产信

息)、个人通信信息(通信记录和内容、短信、彩信、电子邮件,以及描述个人通信的数据(通常称为元数据)等)、网络身份标识信息(个人信息主体账号、IP地址、个人数字证书等)。

**Personal sensitive information** refers to personal information that, once leaked, illegally provided or abused, may endanger personal and property safety, and easily lead to personal reputation, physical and mental health damage, or discriminatory treatment, etc..

个人敏感信息是指一旦泄露、非法提供或滥用可能危害人身和财产安全,极易导致个人名誉、身心健康受到损害或歧视性待遇等的个人信息。

Personal Sensitive Information may include: **Financial Account Information** (Bank account number, deposit information (including amount, payment/receipt records)), **and other sensitive personal information (ID card photos, passport photos.**

个人敏感信息可能包括:金融账户信息(银行账号,存款信息(包括资金数量、支付收款记录)),以及其他敏感个人信息(居民身份证照片、护照照片)。

# 1. How we collect and use your personal information

## 一、我们如何收集和使用您的个人信息

**This Policy should be read together with the Citi Terms. Please kindly note that in accordance with the Citi Terms, Citi does not conduct business in the People's Republic of China through Communication Platform. For your security, please avoid sharing sensitive personal information via Communication Platform and you should not disclose personal information other than your WeChat username, WeChat ID, WeChat profile picture, WeChat chatroom, date and time of message sent, and message content when using the Communication Platform.**

本政策应与花旗条款一并阅读。敬请留意,根据花旗条款,花旗并未通过通讯平台在中国境内开展业务。为保障您的信息安全,请勿通过企业微信分享任何敏感的个人信息。鉴于此,您在使用通讯平台时,不应披露除您的微信用户名、微信ID、微信头像、群聊名称、消息发送日期和时间以及消息内容之外的其他个人信息。

### 1.1 How we collect your personal information

## （一）我们如何收集您的个人信息

When you use the Communication Platform, communication between you and Citi should be limited to communication and administrative purposes only and should not be used to offer financial advice, process transactions, or provide financial products or services. Communication Platform cannot be used to update your personal details with Citi as well. Communication Platform has no transaction capabilities. . If you would like to discuss financial services or products, or carry out transactions, kindly contact Citi offshore through official channels.

当您使用通讯平台时，您与花旗之间的通讯应仅限于一般性沟通及行政管理之用，不得用于提供财务建议、处理交易，或提供任何金融产品及服务。通讯平台亦不能用于更新您在花旗留存的个人信息。通讯平台不具备交易功能。如您需探讨金融服务或产品，或进行相关交易，敬请通过官方渠道联系花旗境外机构。

Other than on the Communication Platform, Citi collects your information only outside of China in accordance with the account terms and conditions you have agreed to with the relevant booking center(s) you have opened accounts with.

除在通讯平台上之外，花旗仅在境外根据您与您开立账户的相关记账行约定的账户条款与条件收集您的信息。

**If any sensitive personal information such as your bank account number, credit card number, deposit information (including amount, payment/receipt records, etc.), ID card information, or passport information is collected by us, we will, in accordance with the requirements of applicable laws, inform you of the processing purpose and method and other contents that need to be informed according to the law, regarding your sensitive personal information collected by us, and seek your separate consent thereof.**

若我们收集了您的任何敏感个人信息，例如银行账号信息、信用卡号信息、存款信息（包括资金数量、支付收款记录）、身份证信息或护照信息，我们将根据适用法律的要求，就我们收集的您的敏感个人信息的处理目的、处理方式以及其他依法需要告知的内容向您进行告知，并征求您的单独同意。

## 1.2 How we use your personal information

### （二）我们如何使用您的个人信息

We may use any personal information collected in the use of Communication Platform, for the processing purpose of, among others, complying with Citi's internal compliance policies, including monitoring and surveillance purposes, in accordance

with the provisions of this Policy, and to provide or improve the functions of our services.

我们可能根据本政策的规定，将使用通讯平台过程中收集到的任何个人信息用于满足花旗集团内部合规政策的要求，包括合规监控与审查之处理目的，以及提供或改进我们各项服务的功能。

1 During the period of services, you authorize us to continuously collect and use your information. When you deregister the services, we will stop collecting personal information related to you, but we may continue to use collected personal information under certain circumstances such as business filing, auditing, regulatory assistance, and fulfilling anti-money laundering and sanctions requirements.

在服务期间，您授权我们持续收集和使用您的信息。当您注销服务时，我们将停止收集与您相关的个人信息，但在某些情形下（例如业务归档、审计、监管协查、履行反洗钱和制裁规定）我们可能会继续使用已收集的个人信息。

2 If we use the information for other purposes which are not stated in this Policy, we will seek your consent in advance.

若我们将信息用于本政策未载明的其他用途，我们将事先征得您的同意。

3 If we use the information collected for a specific purpose for other purposes, we will seek your consent in advance.

若我们将基于特定目的收集的信息用于其他目的，我们将事先征得您的同意。

### 1.3 Exceptions

#### （三）征得授权同意的例外

In accordance with the relevant laws, regulatory requirements, and national standards, we may process your personal information without seeking your separate consent or consent in any of the following circumstances:

根据相关法律法规、监管要求及国家标准，以下情形中，我们可能会处理您的相关信息而无需另行征得您的单独同意或授权同意：

1 Necessary for Citi to perform its statutory duties or obligations.

为花旗履行法定职责或者法定义务所必需的。

2 Necessary to respond to public health emergencies, or to protect the life, health and property safety of natural persons in emergencies.

为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需。

3 Collect or use personal information that has been willingly disclosed to the public by you.

收集或使用您自行向社会公众公开的个人信息。

- 4 Collect or use personal information received & generated from legally and publicly disclosed information, such as legitimate news reports, government information publication or other channels.

从合法公开披露的信息中收集或使用个人信息，例如合法的新闻报道、政府信息公开等渠道。

- 5 Necessary for entering and performing contract(s) according to your instructions. 根据您的要求签订和履行合同所必需的。

- 6 Necessary for maintaining secure and stable operation of our products or services, such as to detect, handle fraud in or misappropriation of the products and services.

为维护我们所提供的产品或服务的安全稳定运行所必需的，例如发现、处置产品或服务中的欺诈或被盗用等。

## **2. How we do entrusted processing of, share, transfer, and publicly disclose your personal information.**

### **二、我们如何委托处理、共享、转让和公开披露您的个人信息**

#### **2.1 Entrusted processing**

##### **(一) 委托处理**

Citi entrusts third-party suppliers to provide support for some of our operations or global businesses. The entrusted activity will not exceed the scope of the agreed processing purpose or method.

花旗委托第三方供应商为我们的部分运营或全球业务提供支持。委托行为将不会超出约定的处理目的、处理方式等范围。

For the third party entrusted by Citi, we will carry out the personal information security impact assessment and sign a contract with the third party, we will require the third party to process your personal information in accordance with laws and regulations, including this policy and other confidentiality and security requirements of Citi, and supervise the third party. Once it is found that the third party fails to process personal information in accordance with the entrusted requirements or fails to effectively fulfill the responsibility of personal information security protection, we

will take or request the third party to take effective remedial measures to control or eliminate the security risks faced by personal information. When necessary, we will terminate the business relationship with the third party and require the third party to delete the personal information obtained from us in a timely manner.

对花旗委托的第三方，我们会开展个人信息安全影响评估并与第三方签署合同，要求第三方按照法律法规、本政策以及花旗其他保密和安全要求来处理您的个人信息，并对第三方进行监督。一旦发现第三方存在未按照委托要求处理个人信息，或未能有效履行个人信息安全保护责任的行为，我们将采取或要求第三方采取有效补救措施控制或消除个人信息面临的安全风险。必要时我们将终止与第三方的业务关系，并要求第三方及时删除从花旗获得的个人信息。

When required by applicable laws and regulations, regarding our provision of your personal information to third parties, we will inform you of the relevant matters including the name and contact information of the personal information recipient, the processing purpose, processing method and type of personal information, and obtain your separate consent thereof.

当适用的法律法规要求时，就我们向第三方提供您个人信息一事，我们会向您告知个人信息接收方的名称或者姓名、联系方式、处理目的、处理方式和个人信息的种类，并取得您的单独同意。

## **2.2 Sharing**

### **(二) 共享**

We do not share your personal information with any company, organization, or individuals, with the following exceptions:

- 1 Share upon your explicit consent: We will share your personal information with other parties after obtaining your explicit consent.
- 2 We may share your personal information to comply with laws and regulations or mandatory requirements from governmental authorities.
- 3 We may share your personal information with third parties for the following purposes:
  - a) We will only share necessary personal information, and the related parties will be bound by the stated purpose in this Policy. If there is any change in the purpose of processing personal information, we will ensure we again seek your authorization and consent.
  - b) Sharing with our partners and third parties for the purpose of business processing or providing services, document storage and retrieving business.

我们不会与任何公司、组织和个人分享您的个人信息，但以下情况除外：

1. 在获取明确同意的情况下共享：获得您的明确同意后，我们会与其他方共享您的个人信息。
2. 我们可能会根据法律法规规定，或按政府主管部门的强制性要求，对外共享您的个人信息。
3. 我们可能为以下目的与第三方共享您的个人信息：
  - a)我们只会共享必要的个人信息，且相关方将受本政策中所声明目的的约束。若处理个人信息的目的发生任何变更，我们将确保再次征得您的授权同意。
  - b) 为处理业务或提供服务之目的与我们的合作伙伴及第三方供应商共享，例如文件存储调阅业务。

We may disclose your personal information to suppliers and other partners who support our business to ensure the smooth completion of the services provided to you. However, **we will only share your personal information for legal, legitimate necessary, specific, and clear purposes, and will only share personal information necessary to provide services.** Our partners have no right to use the shared personal information for any other purpose.

我们可能会为向您顺利完满地提供服务，向支持我们业务的供应商和其他合作伙伴披露您的个人信息。但是，我们仅会出于合法、正当、必要、特定、明确的目的共享您的个人信息，并且只会共享提供服务所必要的个人信息。我们的合作伙伴无权将共享的个人信息用于任何其他用途。

If we share your personal information with third-party(ies) for above purposes, we will request, in written agreement, that the above information is processed in accordance with applicable laws, regulations, personal information protection or privacy policy(ies) and other confidentiality and security requirements to safeguard your information security.

若我们因上述目的与第三方分享您的信息，我们将通过书面协议要求该第三方按照适用的法律法规、个人信息保护或隐私政策以及其他保密和安全要求处理上述信息，以保障您的信息安全。

## 2.3 Transfer

### (三) 转让

We will not transfer your personal information to any company, organization, or individuals except in the following cases:

1. After obtaining your consent.

2. In the case of mergers, acquisitions, or bankruptcy liquidation, if it involves transfer of personal information, we will request the new company or organization, which holds your personal information, to be bound by this Policy. Otherwise, we will ask the new company or organization to resolicit your authorization.

我们不会将您的个人信息转让给任何公司、组织和个人，但以下情况除外：

1. 事先获得您的同意；
2. 在涉及合并、收购或破产清算时，如涉及到个人信息转让，我们会在要求新的持有您个人信息的公司、组织继续受本政策的约束，否则我们将要求该公司、组织重新向您征求授权同意。

## 2.4 Public disclosure

### （四）公开披露

We will only publicly disclose your personal information under the following circumstances:

1. Obtain your separate consent in advance.
2. Disclosure based on law: We may publicly disclose your personal information in the event of mandatory requirement of legal, legal procedure, litigation, or governmental agencies.

我们仅会在以下情况下，公开披露您的个人信息：

1. 事先获得您的单独同意；
2. 基于法律的披露：在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的个人信息。

## 3. How we store and protect your personal information

### 三、我们如何存储和保护您的个人信息

#### 3.1 Storage

##### （一）存储

We will only retain your personal information within the minimum period required by laws and regulations including anti-money laundering and sanction rules if applicable, and within the minimum period necessary for achieving the aim stated in this Policy. Upon expiration of the retention period, we will delete or anonymize your information. When it is technically difficult to conduct deletion or anonymization, Citi will try its best to stop processing except for storage and taking necessary security protection measures.

花旗仅在法律法规要求或为履行反洗钱和制裁规定的最低期限内，以及为实现本政策声明的目的所必须的最低时限内保留您的个人信息，当超出数据保存期限后，花旗会对您的信息进行删除或匿名化处理。删除或匿名化技术上实现有困难时，花旗将尽力停止除存储和采取必要的安全保护措施之外的处理。

## 3.2 Protection

### (二) 保护

1. We have used industry-standard security measures to protect the personal information you provide to prevent unauthorized access, public disclosure, use, modification, damage or loss of data. We will take all reasonable and feasible actions to protect your personal information. We also provide https secure browsing for Citi websites; we use encryption to ensure data confidentiality; we will use trusted protection mechanisms to protect against malicious attacks; we deploy access control mechanisms to ensure that only authorized personnel have access to personal information; and we conduct security and privacy protection training courses to enhance employee awareness of the importance of protecting personal information.

我们已使用符合业界标准的安全防护措施保护您提供的个人信息，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。我们会采取一切合理可行的措施保护您的个人信息。例如，我们对花旗网站提供 https 安全浏览方式；使用加密技术确保数据的保密性；使用受信赖的保护机制防止数据遭到恶意攻击；部署访问控制机制，确保只有授权人员才可访问个人信息；以及举办安全和隐私保护培训课程，加强员工对于保护个人信息重要性的认识。

2. We have established special management systems, procedures, and organizations to ensure the security of information. We strictly limit the scope of persons who can access the information, require them to undertake confidentiality obligations, and conduct audits.

花旗建立专门的管理制度、流程和组织以保障信息的安全，严格限制访问信息的人员范围，要求他们遵守保密义务，并进行审计。

3. The Internet is not a secure environment. Besides, email, instant message, and communication with other Citi users are not encrypted. We strongly recommend you not send personal information in this way. Please use complex passwords to help us keep your accounts secure.

互联网并非安全的环境，而且电子邮件、即时通讯、及与其他花旗用户的交流方式并未加密，我们强烈建议您不要通过此类方式发送个人信息。请使用复杂密码，协助我们保证您的账号安全。

4. The Internet environment is not 100% secure, and we will do our best to ensure or guarantee the security of any information you send to us.

互联网环境并非百分之百安全，我们将尽力确保您发送给我们的任何信息的安全性。

5. In accordance with the requirements of laws and regulations, in the occurrence of any personal information security incident (including information loss, damage, leakage, tampering etc.), we will promptly take treatment measures to avoid damage may result from the data leakage, tampering and information loss etc. If it causes or will cause potential harm to you, we will promptly notify you of the following in accordance with laws and regulations: 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 etc. We will promptly let you know relevant situations of the incident by means of mail, letter, phone call, push notification etc. We will issue announcements in a reasonable and effective manner when having difficulty in reaching out to each personal information subject. Meanwhile, we will also report on the handling status of personal information security incidents as required by regulatory authorities.

按照法律法规的要求，在您的个人信息不幸发生遗失、损毁、泄露或被篡改等安全事件后花旗将及时采取处置措施尽量避免信息泄露、篡改、丢失造成危害。若对您或将要对您造成潜在危害，花旗将及时向您告知安全事件的基本情况和可能的影响、我们已采取或将要采取的安全处置措施，以便您采取自主防范以降低风险。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。同时，我们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。

## **4. Your rights**

### **四、您的权利**

In accordance with China's relevant laws, regulations, standards, and the common practice of other countries and regions, we guarantee you the following rights of your personal information:

按照中国相关的法律、法规、标准，以及其他国家、地区的通行做法，我们保障您对自己的个人信息行使以下权利：

#### **4.1 Enquiry, copy, update or supplement your personal information**

##### **(一) 查询、复制、更正或补充您的个人信息**

You are authorized to enquire, copy, update or supplement your personal information, except for some circumstances stipulated by law and regulations. You could, after identity verification, exercise your rights of data access or obtainment through the following methods:

您有权查询、复制、更正或补充您的个人信息，法律法规规定的例外情况除外。您可以通过以下方式，在验证身份后，行使查询或获取数据的权利：

If you are a Singapore Citigold / Citi Private Client (新加坡花旗金卡及花旗私人财富管理客户), please reach out to [customerservice@citibank.com.sg](mailto:customerservice@citibank.com.sg) and [customerservice@info.ipb.citibank.com.sg](mailto:customerservice@info.ipb.citibank.com.sg) (International Personal Bank Clients) or call your Relationship Manager during working hours (Monday to Friday 9 AM to 6 PM, excluding national holidays).

如果您是新加坡花旗金卡及花旗私人财富管理客户，请在工作时间（周一至周五上午 9 点至下午 6 点，国定假日除外）联系 [customerservice@citibank.com.sg](mailto:customerservice@citibank.com.sg) 和 [customerservice@info.ipb.citibank.com.sg](mailto:customerservice@info.ipb.citibank.com.sg)（国际私人银行客户）或致电您的客户经理。

If you are a Hong Kong Citigold & Citi Private Client, 香港花旗金卡及花旗私人财富管理客户、花旗私人银行客户), please reach out to +852 2860 0111 or call your Relationship Manager during working hours (Monday to Friday 9 AM to 6 PM, excluding national holidays).

如果您是香港花旗金卡及花旗私人财富管理客户、花旗私人银行客户，请在工作时间（周一至周五上午 9 点至下午 6 点，国定假日除外）联系 +852 2860 0111 或致电您的客户经理。

If you are a Citi Private Bank Client, please reach out to [cpbclientenquiry@citi.com](mailto:cpbclientenquiry@citi.com) or call your banker during working hours (Monday to Friday 9 AM to 6 PM, excluding national holidays)

如果您是花旗私人银行的客户，请在工作时间内联系 [cpbclientenquiry@citi.com](mailto:cpbclientenquiry@citi.com) 或致电您的银行家（周一至周五上午 9 点至下午 6 点，国定假日除外）

We will respond to your request within 15 business days. After verifying your personal identity, you can enquire, copy, update or supplement the personal information and payment information in your account, change your password, add security information, or close your account, etc.

我们将在 15 个工作日内回复您的请求。身份验证后，您可以查询、复制、更新或补充账户中的个人信息和支付信息，更改密码，添加安全信息，或关闭账户等。

We will provide you with other personal information generated during your use of our products and services so long as it is within our scope of services.

对于您在使用我们的产品或服务过程中产生的其他个人信息，我们会在业务服务范围内向您提供。

## **4.2 Delete your personal information**

### **(二) 删除您的个人信息**

Under the following circumstances, you can request us to delete your personal information:

1. If our processing of personal information violates any law or regulation
2. If we collect or use your personal information without your consent, or if you withdraw your consent.
3. If our processing of personal information breaches our agreement with you.
4. If you no longer use our products or services, or you close your account.
5. If we no longer provide products or services to you

在以下情形中，您可以向我们提出删除个人信息的请求：

1. 如果我们处理个人信息的行为违反法律法规；
2. 如果我们收集、使用您的个人信息，却未征得您的同意，或者您撤回了您的同意；
3. 如果我们处理个人信息的行为违反了与您的约定；
4. 如果您不再使用我们的产品或服务，或关闭了您的账户；
5. 如果我们不再为您提供产品或服务。

Where the storage period stipulated by law or administrative regulation has not expired, or deletion of personal information is technically hard to accomplish, we will

cease the processing of personal information other than storing and taking necessary security protection measures for such information. We will respond to your request for deletion in accordance with applicable laws or regulations.

法律、行政法规规定的保存期限未届满，或者删除个人信息从技术上难以实现的，我们会停止除存储和采取必要的安全保护措施之外的处理。我们会根据适用的法律法规规定来响应您的删除请求。

### **4.3 Restrict our processing, change or withdraw your authorization scope**

#### **(三) 限制处理、改变或撤销您的授权同意**

You may restrict, change or withdraw your authorization & consent at any time for the collection and use of the additionally collected personal information.

您可以随时限制处理、改变或撤销您对收集的个人信息的收集和使用的授权同意。

You can change the authorization scope by yourself in the following ways:

Contact your banker during working hours (Monday to Friday 9 AM to 6 PM, excluding national holidays) or send an email [CLIENTSERVICE.CTIHK@CITI.COM](mailto:CLIENTSERVICE.CTIHK@CITI.COM).

您可以通过以下方式自行改变授权范围：

在工作时段（工作日周一至周五上午 9 点到下午 6 点，国家法定节假日除外）联系您的客户经理]或发送邮件至 [CLIENTSERVICE.CTIHK@CITI.COM](mailto:CLIENTSERVICE.CTIHK@CITI.COM)。

When you withdraw your consent, we will no longer process your corresponding personal information unless it violates the requirements of laws and regulations. However, this decision to withdraw your authorization will not affect personal information processing upon your previous authorization.

当您收回同意后，在不违反法律法规要求的前提下，我们将不再处理相应的个人信息。但您收回同意的决定，不会影响此前基于您的授权而开展的个人信息处理。

### **4.4 Transfer your personal information**

#### **(四) 转移您的个人信息**

Subject to applicable laws and regulations, after verifying your entity, for personal information provided based on your consent or collected based on a contract, such information will be transferred to a third party designated by you only to the extent permitted by law, provided that such transfer does not violate legal or regulatory

requirements, harm the legitimate rights and interests of others, affect national security or public interests, and is technically feasible.

根据最新的法规要求，我们在验证您的真实身份之后，对基于您本人同意提供的或者基于合同收集的个人信息，在不违反法律法规要求、不损害他人合法权益、不影响国家安全或公共利益、且具备技术可行性的前提下，将遵照您的要求转移该等信息至您指定的第三方。

#### **4.5 Responding to your above request**

##### **(五) 响应您的上述请求**

To ensure security, you may need to provide a written request or other support to verify your identity. We may ask you to verify your identity before processing your request. We will respond to you within 15 business days.

为保障安全，您可能需要提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。我们将在 15 个工作日内 做出答复。

#### **If you are unsatisfied with services, you can also make complaints through the following channels.**

Client hotline for CG-CPC HK: +852 2860 0111

如您不满意，还可以通过以下途径投诉：

香港花旗金卡客户热线电话： +852 2860 0111

In principle, we do not charge for your reasonable request, however, for those repetitive, beyond reasonable requests, we may charge a fee as the case may be. For those unreasonably repetitive requests which need too excessive technical means (for example, need to develop new systems or fundamentally change existing practices), pose risks to others' legal rights, or are very impractical (for example, involving information stored on backup tapes), we may reject such requests.

对于您合理的请求，我们原则上不收取费用，但对多次重复、超出合理限度的请求，我们将视情收取一定成本费用。对于那些无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变现行惯例）、给他人合法权益带来风险或者非常不切实际（例如，涉及备份磁带上存放的信息）的请求，我们可能会予以拒绝。

#### **In the following situations, we will not be able to respond to your request as required by law or regulation:**

1. Directly related to national security and national defense and security.

2. Directly related to public safety, public health, or significant public interests.
3. Directly related to criminal investigation, prosecution, judicial trial and judgment execution etc.
4. There is sufficient evidence that you have subjective malice or abuse of rights.
5. Respond to your request which may result in severe damage to the legitimate rights and interests of you or other individuals or organizations.
6. Involve our trade secrets.
7. For compliance with the regulations of anti-money laundering or sanctions.

在以下情形中，按照法律法规要求，我们将无法响应您的请求：

1. 与国家安全、国防安全直接相关的；
2. 与公共安全、公共卫生、重大公共利益直接相关的；
3. 与犯罪侦查、起诉、审判和判决执行等直接相关的；
4. 有充分证据表明您存在主观恶意或滥用权利的；
5. 响应您的请求将导致您或其他个人、组织的合法权益受到严重损害的；
6. 涉及花旗商业秘密的；
7. 为履行反洗钱和制裁规定。

This policy does not limit your other rights as an information subject under applicable laws and regulations.

本政策不会限制您作为信息主体根据适用的法律法规享有的其他权利。

## **5. How we protect the information of children or minors**

### **五、我们如何保护儿童和未成年人信息**

Our products, services and websites are primarily for adults. Children and minors cannot create their own accounts without the consent of their parents or guardians.

我们的产品、服务和网站主要面向成人。如果没有父母或监护人的同意，儿童和未成年人不得创建自己的账户。

If you are a child/minor, please read these terms carefully and only use our services or provide information to us upon your guardian's consent. If you are guardian of

child/minor, please read these terms carefully and confirm whether you agree to use our services or provide information to us. You should confirm that your child uses our services with your consent and knowledge. We will only collect, use, retain and disclose your information to the extent allowed by laws & regulations and regulatory requirements, explicitly consented by your guardians or necessary for the protection of the interests of children/minors.

如果您是儿童/未成年人，请您仔细阅读本条款，并在征得您的监护人同意的前提下使用我们的服务或向我们提供信息。如果您是儿童/未成年人的监护人，请您仔细阅读本条款，并确认是否同意使用我们的服务或向我们提供信息。您应确认您的孩子在您的同意和知晓下使用我们的服务。我们只会在法律法规规定、监管要求允许、监护人明示同意或者保护儿童/未成年人所必要的情况下收集、使用、存储和对外提供您的信息。

**When we want to use the information of children/minors for other purposes not specified in this chapter, we will obtain the consent of the guardians again in accordance with the requirements of laws, regulations and regulatory requirements.** We will store, use and protect the information of children/minors in accordance with the stipulations of this Policy. We have designated a special-assigned person to be responsible for the protection of children's/minors' information, strictly set information access rights, and adopted the principle of minimum authorization for staff who may have access to children's/minors' information. We promise to keep children's/minors' information strictly confidential and only provide this information to external parties under the stipulations of 'Chapter 3. How we entrusted processing of, share, transfer, and publicly disclose your personal information' in this Policy. If it is necessary to share children's/minors' information with a third party to provide services to you, we will evaluate the legality, legitimacy and necessity of the third party's collection of children/minors' information. We will request third parties to take protective measures for the information of children/minors and strictly abide by relevant laws, regulations, and regulatory requirements. In addition, we will obtain the consent of the guardian of the child/minor in accordance with the requirements of laws, regulations, and national standards, or confirm that the third party has obtained the consent of the guardian of the child/minor.

当我们要将儿童/未成年人信息用于本章节未载明的其他用途时，会按照法律法规及监管规定的要求再次征得儿童/未成年人监护人的同意。我们会按照本政策的约定存储、使用与保护儿童/未成年人信息。我们指定了专人负责儿童/未成年人信息的保护，严格设定信息访问权限，对可能接触到儿童/未成年人信息的工作人员采取最小够用授权原则。我们承诺对儿童/未成年人信息进行严格保密，仅在本政策“二、我们如何委托处理、共享、转让和公开披露您的个人信息”的约定的情况下对外提供儿童/未成年人信息。如果为了向您提供服务而需要将儿童/未成年人信息共享至第三方，我们将评估该第三方收集儿童/未成年人信息的合法性、正当性、必要性。我们将要求第三方对儿童/未成年人信息采取保护措施，并且严格遵守相关法律法规与监管要求。

另外，我们会按照法律法规及国家标准的要求征得儿童/未成年人监护人的同意，或确认第三方已经征得儿童/未成年人监护人的同意。

For the purposes of this Policy, "children" in this chapter refers to natural persons under the age of fourteen, and "minors" refers to natural persons over the age of 14 but under the age of 18.

为本政策之目的，本章节中的“儿童”是指不满十四周岁的自然人，“未成年人”是指已满 14 周岁未满 18 周岁的自然人。

## **6. How your personal information is transferred globally**

### **六、您的个人信息如何在全球范围转移**

In principle, the personal information we collect and generate within the territory of the People's Republic of China will be stored in the territory of the People's Republic of China.

原则上，我们在中华人民共和国境内收集和产生的个人信息，将存储在中华人民共和国境内。

Since we provide products or services through resources and servers across the world, which means that to the extent permitted by regulatory rules and applicable laws, and upon your authorization and separate consent, your personal information may be transferred to the foreign jurisdiction of the country in which you use the product or service, or be accessed from these jurisdictions.

由于我们通过遍布全球的资源和服务提供产品或服务，这意味着，在监管允许和法律适用的情况下，在获得您的授权和单独同意后，您的个人信息可能会被转移到您使用产品或服务所在国家/地区的境外管辖区，或者受到来自这些管辖区的访问。

Such jurisdictions may have different data protection laws or may not have relevant laws. In such cases, we will ensure that your personal information is adequately protected within the territory of the People's Republic of China.

此类管辖区可能设有不同的数据保护法，甚至未设立相关法律。在此类情况下，我们会确保您的个人信息在中华人民共和国境内得到足够同等的保护。

Regarding the exercise of your relevant rights, please contact us through the methods listed in this Policy.

有关您的相关权利的行使，请通过本政策所列的方式联系我们。

## 7. How we update this Policy

### 七、本政策如何更新

We may change this Policy from time to time.

本政策可能不时变更。

We will not undermine your rights entitled under this Policy without your explicit consent. We will post any changes and revisions of this Policy on this page. For significant changes, we also provide more noticeable notices (including for certain services, we will send a notification via email stating the specific changes to this Policy).

未经您明确同意，我们不会削减您按照本政策所应享有的权利。我们会在本页面上发布对本政策所做的任何变更。对于重大变更，我们还会提供更为显著的通知（包括对于某些服务，我们会通过电子邮件发送通知，说明本政策的具体变更内容）。

Significant changes referred to hereunder include but not limited to:

(1) Major changes in our service model, such as changes in relations to the purpose of processing personal information, the type of personal information processed, the way in which personal information is used, etc.

(2) Changes in the main objects of personal information sharing, transfer or public disclosure.

(3) Major changes in your rights to participate in the processing of personal information and the way you are exercising such rights.

(4) Changes in the department, contact information and complaint channels responsible for personal information security.

(5) Personal information security impact assessment report indicates that there is a substantial risk.

本政策所指的重大变更包括但不限于：

（1）我们的服务模式发生重大变化导致诸如处理个人信息的目的、处理的个人信息类型、个人信息的使用方式的变更等；

- (2) 个人信息共享、转让或公开披露的主要对象发生变化；
- (3) 您参与个人信息处理方面的权利及其行使方式发生重大变化；
- (4) 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化；
- (5) 个人信息安全影响评估报告表明存在高风险。

If there is any update to this Policy, the updated content will be publicized through below Citi's official websites:

Singapore Citigold & Citi Private Client:

<https://www.citibank.com.sg/footer/privacy?lid=SGENCBGGNFOTLPRIVACY>;

Hong Kong Citigold & Citi Private Client:

[https://www.citibank.com.hk/english/info/privacy/?controls\\_id=d891f42d-6280-41f5-a5f3-ed48597923ba&history\\_index=1](https://www.citibank.com.hk/english/info/privacy/?controls_id=d891f42d-6280-41f5-a5f3-ed48597923ba&history_index=1);

APAC Citi Private Bank: <https://www.privatebank.citibank.com/privacy>

and will become effective upon publication and supersede the previous relevant content. Please pay attention to changes in relevant announcements from time to time. Please be aware and confirm that, if you continue to use our services and products, it is deemed that you agree to accept the updated terms and conditions.

每当本政策更新时，更新后的内容会通过以下花旗官方网站公布：

新加坡花旗金卡及花旗私人财富管理客户：

<https://www.citibank.com.sg/footer/privacy?lid=SGENCBGGNFOTLPRIVACY>;

香港花旗金卡及花旗私人财富管理客户：

[https://www.citibank.com.hk/english/info/privacy/?controls\\_id=d891f42d-6280-41f5-a5f3-ed48597923ba&history\\_index=1](https://www.citibank.com.hk/english/info/privacy/?controls_id=d891f42d-6280-41f5-a5f3-ed48597923ba&history_index=1);

亚太花旗私人银行客户: <https://www.privatebank.citibank.com/privacy>

公布后即生效，并取代此前相关内容。您应不时关注相关公告的变动。请注意并确认，如您继续使用我们的服务和产品，即视为同意接受更新内容。

## 8. How to contact us

### 八、如何联系我们

If you have any questions, comments or suggestions about this Policy, or require access to, update, rectify, delete your personal information or withdraw your consent, please contact us by the following means:

Email Address: CLIENTSERVICE.CTIHK@CITI.COM

如您对本政策存在疑问，或有相关的投诉、意见或需查阅、更新、更正、删除个人信息或者撤回同意的，可以通过以下方式与我们联系：

电子邮箱：CLIENTSERVICE.CTIHK@CITI.COM

Customers/Users may need to pay communication charges to telecom carriers for calls (charges are as set by respective telecom carriers).

您可能需向通讯运营商支付由此产生的通讯费用（费用标准由通讯运营商制定）。

We will reply within about 15 working days after receiving your request, up to 30 days or a shorter period (if any) stipulated by laws and regulations. For your reasonable request for personal information, we will not charge you in principle. However, for repeated requests that exceed reasonable limits, we will charge a certain cost according to the circumstances within the scope permitted by laws and regulations.

我们将在收到您的要求后约 15 个工作日内，最长不超过 30 天或法律法规规定的更短期限（如有）内予以回复。对于您有关个人信息的合理要求，我们原则上不会向您收取费用。但对多次重复、超出合理限度的要求，我们将视情况在法律法规允许的范围内收取一定成本费用。

If you believe that our personal information processing behavior violates your legitimate rights and interests, you have the right to seek solution through the court or regulatory agencies.

如果您认为我们的个人信息处理行为损害了您的合法权益，您有权通过法院或监管机构寻求解决方案。

## **9. Miscellaneous**

### **九、其他**

The laws of the Hong Kong Special Administrative Region of the People's Republic of China (if you are communicating with Citibank (Hong Kong) Limited or Citibank, N.A., Hong Kong Branch or other Citi entities located in Hong Kong) or the laws of Singapore (if you are communicating with Citibank (Singapore) Limited or Citibank N.A. Singapore or other Citi entities located in Singapore) shall apply to the establishment, effectiveness, performance, interpretation and dispute resolution of these terms and conditions.

本政策的成立、生效、履行、解释及纠纷解决，应受中华人民共和国香港特别行政区法律（若您是与花旗银行（香港）有限公司或花旗银行香港分行或其他位于香港的花旗实体进行往来）或新加坡法律（若您是与花旗银行（新加坡）有限公司或花旗银行新加坡分行或其他位于新加坡的花旗实体进行往来）的管辖。

Matters not covered in this Policy shall be handled in accordance with applicable laws and regulations, our relevant business rules and prevailing financial business practices.

本政策中未尽事宜，按照适用法律法规、花旗相关业务规则及通行金融惯例办理。

These terms and conditions are written in both Chinese and English. In case of discrepancies, the English version shall prevail.

本政策以中英文书就。若有不一致，以英文版为准。