

## Citi Private Bank In View Privacy Statement (Privacy Statement)

Last Updated: January 1, 2023

This Privacy Statement describes how Citigroup Inc. and/or any of its affiliates, subsidiaries or branches wherever located (Citi, us, we or our) may collect, use and disclose information you provide when you access or use the Citi Private Bank In View mobile app, the Citi Private Bank In View website located at [www.citiprivatebank.com](http://www.citiprivatebank.com), and any related offline services (collectively, the Sites/Services).

We advise you to read the Privacy Statement in its entirety, including the jurisdiction-specific provisions in the appendix to this Privacy Statement, which will apply to users in certain jurisdictions. Additionally, please note that Section I of this Privacy Statement, which describes our collection and use of information through our Sites/Services, also serves as our **Notice At Collection** for California residents for purposes of the California Consumer Privacy Act (CCPA), which you can view by clicking [here](#). By using the Sites/Services, you agree to this Privacy Statement.

As you review this Privacy Statement, here are a few important things to keep in mind:

- This Privacy Statement is specific to the Sites/Services and is intended to supplement and not replace the privacy terms relevant to your account(s) or relationship with Citi and any relevant account terms and conditions will continue to apply when you make use of the products and services we make available to you via the Sites/Services. In general this is the location where your account is booked. Visit here: <https://www.privatebank.citibank.com/privacy> to review regional privacy notices that may also apply to you depending on where your account is booked.
- The Site/Services are not intended for children under 13 years of age. We do not knowingly solicit information from, or market to, children under 13 years of age. Citi has no actual knowledge that it sells or shares the Personal Information of minors under 16 years of age.
- Wireless service providers, Internet service providers, device manufacturers and/or social media platforms may have their own privacy notices that are different from this one for the information they may access through your use of the Sites. We encourage you to read their privacy notices as the collection, uses and disclosure of information by those third parties may be different than Citi.
- Our mobile, social media, or other services, sites, pages or materials may have additional terms about the privacy or use of your information. Please review the privacy notice for the specific Site/Service you are using.

Read our full notice with details about your rights [here](#).

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**I. Collection and Use of Personal Information**

We collect two types of information: Personal Information and Other Information.

Personal Information is any information:

- that identifies or can be used to identify you or your household;
- that relates to, describes, is 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 personal medical or health information, account number, account value).

Personal Information includes Protected Health Information (as that is defined by the U.S. Health Insurance Portability and Accountability Act) and Sensitive Personal Information (as that is defined by applicable state laws) and Special Categories of Data (as that is defined by the E.U. General Data Protection Regulation) and, to the extent applicable, any respective meaning given by the Swiss Federal Act on Data Protection dated 19 June 1992 (including its ordinance(s)), as amended from time to time. Please note that Citi does not collect Protected Health Information.

Other Information is information that does not and cannot reveal an individual's specific identity, such as information that has been de-identified or aggregated. This Other Information is described in more detail in the Collection and Use of Information section below.

**For at least the past 12 months, we have collected and used the following categories of Personal Information for the following business purposes (depending on the nature of your interactions with us):**

Category of Personal Information	Our Business Purpose(s) for Collecting this Information
<p><b>Personal Identifiers</b>, such as your name, addresses, phone numbers, email, facsimile number, alias, mother's maiden name, as well as <u>Social Security number, and information that appears on your Driver's license, Green card, National ID, State ID, or Passport/Visa which are considered Sensitive Personal Information.</u></p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Site/Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>

<p><b>Characteristics of Protected Classifications</b>, including gender, age, race, ethnicity, nationality, and your citizenship and military status, <u>all of which are considered Sensitive Personal Information</u>.</p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>
<p><b>Demographic Information</b>, including date of birth, information from a birth certificate or death certificate, and relationship status.</p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>

<p><b>Financial Information</b>, including Tax ID, bank account and/or payment card information, credit history, credit score, credit report, income, assets, liabilities, net worth, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, <u>all of which are considered Sensitive Personal Information.</u></p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>
<p><b>Commercial Account and Transaction Information</b>, including your user ID, account holder name, account PIN and password security question(s) and word(s), signature, assets in the account, bank SWIFT code, credit card PIN, , merchant name and contact information, merchant category code, transaction data/history, and language preference. <u>Your credit card PIN is considered Sensitive Personal Information.</u></p>	<ul style="list-style-type: none"> <li>• Providing a mobile experience that matches your device;</li> <li>• Diagnosing server problems;</li> <li>• Ensuring that the Sites/Services function properly;</li> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of Citi Private Bank In View, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>

<p><b>Internet or other Electronic Network Activity Information</b>, such as usage data through Citi's mobile apps (e.g. the date and time the app on your device accesses our servers and what information and files have been downloaded to or presented through the app), information collected through cookies, web beacons and other technologies (e.g. operating system name and version, browser type and version, Site navigation history from within a Citi account), and aggregated information about your visits to, or use of, our Sites/Services, as well as across other sites, and various attributes associated with your device (e.g. device manufacturer and model, unique ID assigned to your device, IP or MAC address, installed fonts, language preference and browser settings, and time zone in order to create a device fingerprint or identifier so that we can recognize your device). While that information alone may not reveal your specific individual identity, we may associate this usage and Other Information we collect with Personal Information about you.</p>	<ul style="list-style-type: none"> <li>• For security or quality control purposes;</li> <li>• Facilitating navigation;</li> <li>• Displaying information more effectively;</li> <li>• Better tailoring and personalizing our service to you (both online and offline);</li> <li>• Recognizing your device;</li> <li>• Assisting your use and experience of the Sites/Services;</li> <li>• Improving the design and functionality of the Sites/Services;</li> <li>• Understanding how the Sites/Services are used;</li> <li>• Assisting us with resolving questions regarding the Sites/Services;</li> <li>• Operation, maintaining, and protecting our Sites/Services;</li> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Improving, upgrading, or enhancing our products and services;</li> <li>• Improving your experience on our Sites/Services;</li> <li>• Performing research and business analytics;</li> <li>• Understanding your interests and preferences;</li> <li>• Tailoring and sending you marketing communications for ourselves and for selected third parties;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Compliance applicable laws and regulations.</li> </ul>
<p><b>Geolocation Information</b>, including precise physical location of your device by using satellite, cell phone tower, or wireless local area network signals (for example), as well as through the use of beacons in our branches. <u>Your precise geolocation is considered Sensitive Personal Information.</u></p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Sites/Services and transactions;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Ensure that the Sites/Services function properly and otherwise administer the Sites/Services;</li> <li>• Providing customer service;</li> <li>• Improving upgrading, or enhancing our products and services;</li> <li>• Performing research and business analytics, and identifying usage trends;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations;</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Notice;</li> <li>• Tailoring marketing communications from our affiliates as well as from selected third parties;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services.</li> </ul>

<p><b>Professional, Employment, and Educational Information</b>, including information about your education, employment and employment history, and property, criminal offenses, and dependent/beneficiary name(s).</p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Improving our Sites/Services to ensure the content is tailored to your device and presented to you in the most effective and relevant way;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>
<p><b>Biometric Information</b>, <u>which is considered Sensitive Personal Information.</u></p>	<ul style="list-style-type: none"> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>

<p><b>Audio and Visual Information</b>, including your photo (when provided), image documentation, and your voice recordings (when provided).</p>	<ul style="list-style-type: none"> <li>• Providing a mobile experience that matches your device;</li> <li>• Diagnosing server problems;</li> <li>• Ensuring that the Sites/Services function properly;</li> <li>• Reviewing and processing applications for our Services;</li> <li>• Intake of new customers;</li> <li>• Account maintenance and servicing;</li> <li>• Providing customer service;</li> <li>• Monitoring and analyzing the use of our Sites/Services;</li> <li>• Administering our Sites/Services;</li> <li>• For internal operations including Service and network security;</li> <li>• Aggregated data analysis;</li> <li>• Statistical and survey purposes;</li> <li>• Engaging in fraud monitoring and prevention;</li> <li>• Compliance with applicable laws and regulations.</li> <li>• Protecting our business and our customers against illegal activity;</li> <li>• Performing audits;</li> <li>• Verifying requests made pursuant to this Privacy Statement;</li> <li>• Managing our business effectively;</li> <li>• Developing new products and services;</li> <li>• Permitting the functionality of our Sites/Services, for example to fulfil your request to download a report or to conduct transactions.</li> </ul>
<p><b>Inferences</b>, drawn from any of the information above to create a profile about you that may reflect, for example, your preferences, characteristics, and behavior.</p>	<ul style="list-style-type: none"> <li>• Providing customer service and support;</li> <li>• Improving, upgrading, or enhancing our Site/Services;</li> <li>• Performing research and business analytics;</li> <li>• Tailoring marketing communications from our affiliates as well as from selected third parties.</li> </ul>

In addition to Personal Information you provide directly to us, we may collect Other Information about you, including by acquiring and using services provided by other parties who collect and analyze customer data. In some instances, we may combine Other Information with Personal Information where permissible by law and applicable industry guidelines.

We will retain your information for as long as reasonably necessary for the purposes described above.

We do not sell or share your Personal Information, as described in California law.

If you are a California resident, please see supplemental provisions in the [Appendix](#) of this Notice for information about your rights as a consumer under the CCPA.

For users of the Sites/Services located in the EEA, United Kingdom, Switzerland or Jersey or where we are processing your data in any of our EEA, United Kingdom, Switzerland or Jersey booking centres, we confirm that we will usually collect your information for the purposes outlined above where this is necessary for our or a third party's legitimate interest, provided your interests do not override these interests.

However, in relation to non-essential cookies (see Sources of Personal Information section below for more information), to the extent your consent is required by applicable law, we will only use your information if we have your consent. We may also sometimes be obliged by law (see Disclosure of Personal Information section below for more information) to disclose or otherwise use your information.

## II. Sources of Personal Information

We collect and obtain information from:

**You.** We collect information directly from you through the Sites/Services. For example, we collect information if you contact us or sign up for our emails. We collect information to process your applications and transactions.

**Service Providers.** We work with service providers who collect information on our behalf in order to provide services to us. We only allow our service providers to collect and use your Personal Information in connection with the services they provide us.

**Third-Party Sources.** We may collect information about you from certain third-party sources, including, for example, financial institutions, government sources or other publically available sources. This helps us with engaging in fraud monitoring and prevention, compliance with applicable laws and regulations; reviewing and processing applications for our Services, intake of new customers, managing our business effectively, and account maintenance and servicing.

**Cookies and Similar Technologies.** We may use cookies, web beacons/pixel tags, log files, and other technologies to collect certain information about visitors to our Sites/Services, use of our online features, and interactions with our emails. For example, through these means, we may collect your browser type and operating system, viewed web pages, links that are clicked, IP address, sites visited before coming to our Sites/Services, emails we send that you open or forward or click through to our Sites/Services. Collecting the foregoing information, and linking it with other information that you may provide, helps us to best tailor our Sites/Services to you and enhance your online experience by saving your preferences while you are visiting a particular page, and to help identify Sites/Services features and offers that may be of particular interest to you.

Please note that the Sites/Services use of cookies is limited to:

- Essential cookies, which allow our services to operate in a secure and reliable manner, and provide basic service functionalities within our sites. These cookies are essential for the Sites/Services and your device will accept them by default. You can set your device to delete them after each session or at any time thereafter.
- Functional cookies, which provide enhanced personalization, functionality and navigation. These cookies may be set by us or a third party.

No cookie set by Citi on your device will contain information that could jeopardize bank secrecy or enable third parties to gather information about you. All traffic and data analytics are managed, licensed to, or controlled from within Citi's IT networks.

**Can You Opt Out?** Visit the Your Choices Regarding Your Personal Information section below for more information on how to opt out from tracking technologies.

## III. Disclosure of Personal Information

During at least the past 12 months, we have disclosed your Personal Information for the following business or commercial purposes:

- All categories of Personal Information listed above to our affiliates to the extent permissible under applicable law;
- Personal Identifiers, Characteristics of Protected Classifications, Demographic Information, Financial Information, Commercial Account and Transaction Information, Internet or other Electronic Network Activity Information, Biometric Information, Audio and Visual Information, and Inferences to third parties, for a business purpose, as detailed in the Notice at Collection section above;
- All categories of Personal Information listed above to our service providers, who provide services such as sending



you marketing communications on our behalf, website hosting, data analysis, information technology and related infrastructure provision, customer service, processing your transactions, email delivery, auditing, and other services; and

- All categories of Personal Information listed above may be disclosed to a third party in the event of any proposed reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We also may use and disclose your Personal Information as we believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) in connection with an examination of us by bank or other examiners; (d) in connection with an audit; (e) to enforce our terms and conditions; and (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others.

Please note that information about you that is available to you via the Sites/Services, including your account information, may become subject to the legal systems and laws in force in each state or country (a) where it is held, received or stored by you or us, (b) from where it is accessed by you or us, or (c) through which it passes. Such information can become subject to disclosure pursuant to the laws of those states or countries. In addition, because your account(s) may include information about more than one individual (e.g., where you maintain a joint account) and about your business relations with Citi, statements released to comply with legal process may contain information regarding your relationship with these individuals and with us and our affiliates.

Where appropriate, we will limit disclosure of your Personal Information in accordance with the choices you have provided us in response to our Customer Privacy Notice(s) or other privacy choices that we may make available.

We may provide de-identified and aggregated information to our affiliates and third parties to help deliver products, services, and content that are tailored to the users of our Sites/Services and for other business purposes.

We may transfer information to Citi affiliated companies or other parties throughout the world to process transactions and provide you with products and services. Regardless of where we process your information, we still treat it in accordance with this Privacy Statement and applicable law.

#### **IV. Your Choices Regarding Your Personal Information**

You have certain rights and choices with regard to your Personal Information.

##### **A. Your California Privacy Rights**

If you are a California resident, you have the right to request and receive certain information about disclosure of your Personal Information to third parties for their direct marketing purposes. Because it is our policy not to share your Personal Information with third parties for third-party direct marketing purposes without your consent, we are exempt from the requirement to respond to such requests. If you have any questions related to our policy, please contact us using the information provided in the Contact Us section below.

For information regarding how to exercise your rights as a consumer under the California Consumer Privacy Act, please see supplemental provisions for California residents in the Appendix to this Notice.

##### **B. Marketing Emails**

To stop receiving our promotional emails, you can follow the instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages.

##### **C. Cookies**

Citi's use of cookies on the Sites/Services is limited to the following types of cookies: essential cookies and functional cookies.

#### **Retention of Information Collected Through Cookies**

When we collect your information using cookies or in some other way that may require your consent, we will use your information for as long as is necessary or until you ask us to stop, and for a reasonable period afterwards to allow us to comply with your request.

Where we are using your information in any other circumstances we will keep it for a suitable and reasonable period in order to comply with any request you made when providing the data.

##### **D. Do Not Track**

Some browsers have a Do Not Track feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do respond to browser do not track signals.

#### **V. Updating Your Personal Information**

Keeping your account information accurate and up to date is very important. If your account information is incomplete, inaccurate or not current, please use the Contact Us option on our Site, or call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials. You can also speak to a branch representative, your financial advisor or your designated account representative.

#### **VI. Security of Personal Information**

The security of your Personal Information is a priority. We seek to protect this information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. We provide employee training in the proper handling of Personal Information. Unfortunately, no data transmission over the Internet or wireless network or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately contact us in accordance with the Contact us section below.

#### **VII. Other Important Information**

##### **A. Notice of Changes**

We may change this Privacy Statement from time to time. Please take a look at the Last Updated legend at the beginning of this Privacy Statement to see when this Privacy Statement was last revised. When we do, we will post the revised Privacy Statement on this page with a new effective date. Any changes will become effective when we post the revised Privacy Statement on the Site. Your use of the Sites/Services following these changes means that you accept the revised Privacy Statement.

##### **B. Third-Party Sites and Services**

This Privacy Statement does not address, and we are not responsible for, the privacy, security, or other practices of any third parties, including any third party operating any site or service to which the Site links. The inclusion of a link on the Site does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, usage, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other third-party app provider, social media platform provider, operating system provider, device manufacturer, or wireless service provider, including with respect to any Personal Information you disclose to other organizations through or in connection with the Sites/Services.

##### **C. Cross Border Data Transfers**

By accessing the Sites/Services, information about you, your accounts and your relationship with us may be transferred outside the country where you are located or opened your main account or product, if any (your 'Booking Centre'). Information relating to online and electronic services is likely to be subject to supervision by the financial regulators in your Booking Centre and may

be partially visible (to the extent required to perform your transaction and the country where services are performed). Your online banking details are protected by strong encryption (as described below) while information transits through our network and will only be available to your Booking Centre and to you via authentication, and not to any other intermediary point in the communications chain.

**VIII. Contact us**

If you have any questions about this Privacy Statement, please contact your Citi Private Bank representative or visit the ‘Contact us’ link on our website.

If you would like to submit a request pursuant to the California Consumer Privacy Act (“CCPA”), please visit [Citi’s Global Privacy Hub](#) or call 833-981-0270 (TTY: 711). For requests related to non-U.S. accounts or services, please visit [https://online.citi.com/CCPA\\_non-US\\_Request.pdf](https://online.citi.com/CCPA_non-US_Request.pdf) to print a form and mail to us. If you wish to submit a request to have your Personal Information deleted or corrected (see sections II.A.3. and II.A.4 in the Appendix below) or call us at 833-981-0270.

APPENDIX — Jurisdiction Specific Provisions

I. Supplemental provisions for European Union, European Economic Area, United Kingdom, Switzerland and Jersey residents

Under the General Data Protection Regulation (EU) 2016/679 or equivalent laws outside the European Union you have data subject rights, including the right to access and correct personal data we have about you, and in some circumstances to require us to delete your personal data or to object to or require us to restrict the processing of your data, for data that is processed by or on behalf of any Citi branch or affiliate in the EU/EEA, United Kingdom, Switzerland or Jersey. You may exercise these rights by sending a written request to the contact address indicated below. You may be asked to supply valid means of identification to assist us in preventing unauthorized disclosure of your personal data. We will process your request free of charge and respond within the time provided by applicable law. Visit our [Citi Private Bank \(EMEA\) Privacy Statement](#) for details, including the contact addresses in the European Union, United Kingdom, Jersey and Switzerland.

Data Protection Officer (Chief Data Privacy Officer - EMEA)

EU/EEA	UK
<p><b>EU/EEA Data Protection Officer</b>                      Citi                      1 North Wall Quay                      Dublin                      D01 T8Y1                      Ireland                      Email: <a href="mailto:dataprotectionofficer@citi.com">dataprotectionofficer@citi.com</a></p>	<p><b>UK Data Protection Officer</b>                      Citi                      Citigroup Centre                      25 Canada Square                      London                      E14 5LB                      United Kingdom                      Email: <a href="mailto:dataprotectionofficer@citi.com">dataprotectionofficer@citi.com</a></p>

II. Supplemental provisions for California residents.

A. Requests. California residents have certain rights with respect to Personal Information under the California Consumer Privacy Act (CCPA). For purposes of this subsection, the terms consumer, categories of personal information, business purpose, third party, sell, and share have the meanings ascribed to them respectively in the CCPA. Terms defined under the CCPA may differ in meaning from the common usage of the same terms used elsewhere in this Privacy Statement.

1. You have the right to request, up to two times every 12 months, that Citi disclose to you the following: (i) the categories of Personal Information that Citi has collected about you; (ii) the categories of sources from which Citi has collected Personal Information about you; (iii) the business or commercial purpose for collecting, selling, or sharing your Personal Information; (iv) the categories of Third Parties to whom the Personal Information was disclosed and (v) the specific pieces of Personal Information that Citi has collected about you. Please note that Personal Information we have collected in connection with your personal

account with us is not subject to the requirements of CCPA because it is already protected under existing federal and California state privacy laws, including the Graham Leach Bliley Act.

2. You have the right to request a portable copy of your Personal Information.

In response to verified requests pursuant to #1 or #2 above, we will confirm receipt of the request within 10 business days of receipt of the request, and disclose and deliver the required information to you free of charge within 45 days of receiving a verifiable consumer request. We may extend this time period to deliver information once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

3. You have the right to request that Citi delete Personal Information collected from you, subject to certain exceptions allowed under applicable law.

In response to verified requests pursuant to #3 above, we will confirm receipt of the request within 10 business days of receipt of the request. Following verification of your request, we may require you to separately confirm that you want your Personal Information to be deleted. We will delete the information within 45 days of receiving a verifiable consumer request (subject to certain exceptions). We may extend this time period once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

4. You have the right to request that Citi correct inaccurate Personal Information collected from you, subject to certain exceptions allowed under applicable law. We will accept, review, and consider any documentation that you provide in connection with your right to correct, provided you make a good-faith effort to provide Citi with all relevant information available at the time of the request.

In response to verified requests pursuant to #4 above, we will confirm receipt of the request within 10 business days of receipt of the request. Following verification of your request, we may require you to provide documentation if necessary to rebut our own documentation that the Personal Information is accurate. If, we determine, based on the totality of the circumstances, that the information is not accurate, we will respond to the request by correcting the information or deleting the information (if deletion of the information does not negatively impact you). We will correct within 45 days of receiving a verifiable consumer request. We may extend this time period once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

5. You have the right to opt out of the sale of your Personal Information to, or the sharing of it with, Third Parties. CCPA defines sale very broadly, covering both monetary and other consideration. The same is true of the CCPA's definition of share, except that sharing under the CCPA relates only to the targeting of advertising based on Personal Information from an individual's interaction with other websites and services. We do not sell or share your Personal Information, as described in California law.

6. You have the right to limit the use of your Sensitive Personal Information to those uses that are necessary to perform the services or provide the goods reasonably expected by an average consumer and to certain other permitted business purposes. These business purposes include helping to perform services or provide goods reasonably expected by consumers who have requested such services or goods, ensure security and integrity (to the extent the use of the information is reasonably necessary and proportionate for these purposes), ensure physical safety of natural persons (to the extent the use of the information is reasonably necessary and proportionate for these purposes), short-term, transient use (subject to certain conditions), performing certain services, and engaging in certain activities related to quality or safety of our services or products. We do not use any Sensitive Personal Information for any purpose outside of the purpose for which it was shared with us.

7. Citi will not discriminate against you because you elect to exercise these rights, including by:

- Denying goods or services to you.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

None of the foregoing, however, prohibits Citi from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to Citi by your data.

- B. Submission of Requests. You may exercise these rights by managing this information through [Citi's Privacy Hub](#) or by calling us at 833-981-0270. For requests related to non-U.S. accounts or services, please visit [https://online.citi.com/CCPA\\_non-US\\_Request.pdf](https://online.citi.com/CCPA_non-US_Request.pdf) to print a form and mail to us. If you wish to submit a request to have your Personal Information deleted (see section II.A.3 in this Appendix), call us at +1 833-981-0270 (TTY: 711). If you wish to submit any type of CCPA request through an authorized agent, please follow the process in Section II.C. below.
- C. CCPA Authorized Agent. CCPA permits consumers to designate authorized agents to submit requests on their behalf. Under CCPA, an authorized agent is a natural person or a business entity in California that a consumer has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know, a request to delete, or a request to correct Personal Information on your behalf, please call us at +1 833-981-0270 (TTY: 711).

You or your authorized agent may provide us with a written power of attorney, executed by you, confirming the authority of the authorized agent with respect to your CCPA request(s).

If we have not received a power of attorney, we may require your authorized agent to provide proof that you gave the agent signed permission to submit your CCPA request(s).

In addition, we may also require you to do the following directly with us:

1. Verify your own identity with us;
2. Confirm you have provided the authorized agent permission to submit the CCPA request(s).

Once verified (see Section II.D. below), your authorized agent may create a unique account for you through Citi's Privacy Hub at [online.citi.com/dataprivacyhub](https://online.citi.com/dataprivacyhub) and manage your requests through that account.

- D. Verification. Whether you submit a request directly on your own behalf, or through an authorized agent, we will take reasonable steps to verify your identity prior to responding to your requests under CCPA. Upon receiving a request pursuant to II.A.2, II.A.3 or II.A.4 above, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. In order to verify your request, we will require you to provide your social security number, tax ID number or passport number and issuing country, in addition to your first and last name, email address and mailing address.

### III. Supplemental provisions for Singapore and Hong Kong

In Singapore, the Personal Data Protection Act (PDPA) came into full effect in 2014. The PDPA essentially sets out the personal data protection regime of Singapore. For more information on how we comply with the PDPA (if your account is booked in

Singapore) and additional provisions which may be applicable to you, including to whom requests under the PDPA may be submitted to in Singapore, please refer to Citibank Singapore Circular relating to the PDPA set out in <https://www.privatebank.citibank.com/newcpb-media/media/documents/PDPA-SG-Circular.pdf>.

Similarly, in Hong Kong, Citi respects and safeguards the privacy of individuals and complies with the Personal Data (Privacy) Ordinance (PDPO). For more information on how we comply with the PDPO (if your account is booked in Hong Kong) and additional provisions which may be applicable to you, please refer to the Circular relating to the Personal Data (Privacy) Ordinance and Usage of Customer Information set out in <https://www.privatebank.citibank.com/newcpb-media/media/documents/PDPO-HK-Circular.pdf>