

Citi Private Bank ONLINE PRIVACY NOTICE

May 2018

Privacy by Design and by Default

Citi will not disclose or provide information about you, your accounts, your relationship with the Private Bank, or your usage of www.privatebank.citibank.com or www.citiprivatebank.com ('our website') to any third party for any purpose without your written consent, except as set forth in this Online Privacy Statement (see "Disclosures to Third Parties" below for more information). We know, however, that most Private Bank clients want their Private Banker to give them access to products and services available from our affiliates across the globe. The Private Bank will, therefore (and provided, where required, you grant consent), use data from your usage of citiprivatebank.com (including technical and personal data from the use of cookies or data analytics) to gauge your potential interest in products or services and for the Private Bank's product and relationship development purposes, and in order to customize the services and information available to you via citiprivatebank.com.

How do we collect information about you?

Information you provide	When you send a request for us to contact you, or provide your details to us in order to download a publication. This information may include name, username, phone number, email address, place of residence and other contact information.
Information collected automatically	<p>When you visit our website, we will retain certain technical information related to your device, such as your IP address and location data, referring website, the time, date and duration of your visit, the type of device used, and the pages your device last visited.</p> <p>Some information is collected by cookies (see "Use of Cookies" below for more information). Where such cookies are not essential to the operation of the website or provision of a service, we may provide you with the option to turn them off.</p>

Why do we collect your information?

We use the information we collect on citiprivatebank.com:

- To administer our website and for internal operations including site and network security, data analysis, statistical and survey purposes;
- To improve our websites to ensure the content is tailored to your device and presented to you in the most effective and relevant way;
- To monitor and analyse the use of our website;
- To market our products and services; and
- For other purposes that are made clear to you at the time you submit your information, for example to fulfill your request to download a publication or to provide you with information you have requested about our services.

For users of citiprivatebank.com located in the EEA, Switzerland or Jersey or where we are processing your data in any of our EEA, Switzerland or Jersey booking centers, 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 "Use of Cookies" below for more information), or in relation to any form of direct marketing, where your consent is required, we will only use your information if we have your consent. We may also sometimes be obliged by law (see "Disclosures to Third Parties" below for more information) to disclose or otherwise use your information.

For how long will we store your information?

Where we are using your information with your consent (such as where you have consented to cookies), 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 required by law or regulation. 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 or as otherwise required under relevant local law.

Use of "Cookies"

A "cookie" is a small piece of information that a site stores on your web browser and can later retrieve. Citiprivatebank.com uses several types of cookies:

- Essential cookies allow our services operate in a secure and reliable manner, and provide basic service functionalities within our sites. These cookies are essential for a banks site and your internet browser will accept them by default. You can set your browser to delete them after each online session or at any time thereafter.
- Functional cookies provide enhanced and personalized website functionality and facilitate navigation. These cookies may be set by us or a third party.
- Advertising and targeting cookies build a profile of your interests and show you appropriate adverts on other websites.

In addition to the cookies on citiprivatebank.com, we may also use the following cookies:

- We may use advertisements on Internet browsers and third party sites, such as AdSense, AdWords and DoubleClick. Online advertisements contain non-personalised cookies for the collection of technical information from devices used by individuals who interact with them: these details are typically web requests, IP addresses, browser types, browser languages and/or the date and time of the information requests. Citi is the ultimate controller of such Ads. Management of these Ad cookies is not contained on Citi sites but at your browser level. You can also change your Ad Click and browser settings to manage the ads you see and opt out of personalization at browser level or using the facilities in the ad.
- We may use in-use hosted or sponsored content in third party web browsers and in social media sites and mobile apps that contain certain features, such as LinkedIn and Facebook sharing, downloading, liking, commenting and messaging. These features may collect your IP address and which page you are visiting and may set cookies to enable hosted features to function properly which relay information to Citi.

No cookie set by Citi on your web browser 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.

You will be presented with cookie choices when navigating our site and will be reminded to refresh your options from time to time. We also provide options for more detailed cookie management. For browser level privacy choices you may visit the help pages provided within your browser or www.youronlinechoices.com and others.

Cross Border Data Transfers

We currently provide www.citiprivatebank.com through our New York branch. By accessing www.citiprivatebank.com or using online banking services, information about you, your accounts and your relationship with us may be transferred outside the country where you are located. Such

information may be subject to supervision by the regulatory authorities in each jurisdiction where services are performed, your information resides or the country where you are located.

Disclosures to Third Parties

Information about you that is available to you via citiprivatebank.com, , can 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.

We may disclose your name and other personal and other financial information we hold about you (1) at the request of a bank or other regulatory agency or in connection with an examination of us by bank or other examiners; (2) pursuant to subpoena or other legal process; (3) at the express direction of any other authorized government agency; (4) to our internal or external attorneys or auditors; (5) to others to whom we are required to make such disclosure by law; (6) to an Internet service provider or any other third-party agent or service provider for the any purpose related to offering, providing, administering or maintaining our website, products or services; or (7) as permitted under the terms of client account documents or other agreements you have entered with us.

Data Protection on the Internet

citiprivatebank.com is a private, restricted-access Internet-based service. We use encryption technology to protect the transmission of account data to or from you via citiprivatebank.com. For security reasons and to safeguard the security of your data, access to citiprivatebank.com is limited to browsers that can support a minimum of 128-bit encryption technology. Nevertheless, because information about you can be accessed through a public network, the Internet, there can be no assurance that this information will remain secure and you accept the risk that unauthorized persons may view such information. If you believe that an unauthorized person has accessed your information, please contact a member of your Private Bank team immediately.

Please read the [Terms and Conditions](#), which also govern your use of citiprivatebank.com. Citi may change this statement at any time. Any changes or updates will be effective immediately upon posting to citiprivatebank.com. The effective date of this statement indicates the last time this statement was changed or updated. Checking the effective date allows you to determine whether there have been changes or updates since the last time you reviewed this statement.

Citi Private Bank Privacy Statements

This Online Privacy Statement should be read with the relevant Privacy Statement for the place where you are located, or if you are a client, the place where your account is booked. You will find details of our booking vehicles in these documents:

Citi Private Bank (NAM & LATAM) Privacy Statement

View the [Citi Private Bank \(NAM & LATAM\) Privacy Statement](#).

Citi Private Bank EMEA Privacy Statement

View the [Citi Private Bank EMEA Privacy Statement](#).

Personal Data Protection Laws in Singapore and Hong Kong

For Singapore: [Citibank Singapore Circular relating to the Personal Data Protection Act](#)

For Hong Kong: [Circular relating to Personal Data \(Privacy\) Ordinance and Usage of Customer Information](#)

European Union, European Economic Area, Switzerland and Jersey

Under the General Data Protection Regulation (EU) 2016/679 or equivalent laws outside the EEA, 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, 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.

Data Protection Officer (Chief Data Privacy Officer - EMEA)
33 Canada Square
London
E14 5LB
United Kingdom
Email: Dataprotectionofficer@citi.com

See the Citi Private Bank EMEA Privacy Statement above for more information.

California and Delaware Do not Track

California and Delaware law require Citi to indicate whether it honors “Do Not Track” settings in your browser concerning targeted advertising. “Do not Track” is presently under implemented/under development. Until full implementation Citi will adhere to the principles set out in this Online Privacy Notice and our Privacy Statements,

Your web browser may block cookies for behavioral advertising. To successfully switch off advertising you may adjust your browser settings.

How we protect your online security

Your online security is of utmost importance to us. We believe that good security covers all the bases—sophisticated technology, as well as the most stringent principles of privacy. Much of our work takes place behind the scenes, but occasionally we'll ask you to provide a new password or perhaps added questions to help us identify you. Below we outline a few of the ways we safeguard your online experience and offer a few suggestions to help you ensure your online security. Strong Encryption - To ensure security while accessing any password-protected website, Citi Private Bank employs 128-bit encryption and Secure Sockets Layer. 128-bit encryption, the strongest level of encryption generally available today, means there are 2128 possible combinations of keys but only one that will unlock the information.

Automatic Time Out - When there is no activity for 15 minutes, your session will be terminated to help protect against unauthorized access.

Client-Driven Authentication Questions - If you are a client and call [Web Services and Support](#) with questions about citiprivatebank.com, we must confirm your identity on the phone before discussing your account information.

How can you protect your online security?

Along with the security measures used by our website, there are measures you can take to ensure the security of your computerized personal information:

- Use anti-virus, anti-spy ware, and pop up blocker software.
- Keep your Operating System updated with the latest security updates and patches.
- Review your Internet security settings.
- Be wary of e-mails from addresses or people you do not know and do not open email attachments from strangers.
- Watch out for phishing e-mails.
- Avoid using "public" computers or network connections, especially when reviewing financial information.
- Do not use a computer or a device which cannot be trusted.
- Protect your laptop and other portable electronic devices.
- Clear your browser's cache.
- Back up your personal data and store backups in a secure location.
- Keep your password confidential and avoid using the same password for different websites.

- For further information, please visit: [Best Practices to Protect Your Information.](#)

What is encryption? What is it used for?

Encryption technology allows information to travel securely on the Internet. Using a mathematical formula, information is encoded, or "scrambled", by the sender. The receiver must decode, or "descramble" the information by using the corresponding "decoder". Without the corresponding "decoder", the information would be unusable.

Encryption technology can be used for a host of applications, including electronic commerce (sending credit card numbers for orders or transmitting account information), email messages and sensitive documents.

How secure is encryption? How secure is the Private Bank's website?

The effectiveness (or level of security) for encryption is measured in terms of how long the key is—the longer the key, the longer it would take for someone without the correct "decoder" to break the code. The length of the key is measured in bits. The level of encryption used with many ordinary browsers is 40-bit, while the level of encryption required to use the Private Bank's website is 128-bit.

For a 40-bit key, there are 240 possible different combinations. For a 128-bit key, there are 2128 possible different combinations.

All transmission of customer information through the Private Bank's Internet site is encrypted using 128-bit encryption technology, which is currently the strongest encryption level that is generally available. Your browser is probably 40-bit if you haven't specifically downloaded 128-bit.

What are some good security practices that I can use?

When using any website that contains your personal data, be aware of the following to help keep your information secure and private. Also, remember to check your information frequently. If you spot any discrepancies, report them immediately to a member of your Private Bank team.

Public Access Computers Using an Internet cafe, airport Internet kiosk, or any other shared computer to access your personal data may be convenient, but you must be aware of the potential risk involved. If you do not clear the browser's cache on the computer you use, someone else might be able to access your personal data. Also, be wary of people that may look over your shoulder—they could potentially see your login ID, password, or personal data as you use a website.

Website Authenticity One way to determine the authenticity of the website is to compare the URL, found in your browser's Location or Address window, with the bank name found in the digital certificate. If you're accessing Citi Private Bank's website, you should see a URL that starts with any of the following:

- <https://www.privatebank.citibank.com>
- <https://www1.privatebank.citibank.com>
- <https://www2.privatebank.citibank.com>
- <https://www3.privatebank.citibank.com>
- <https://www4.privatebank.citibank.com>

Cached Data As you use any website, pages, images and files that you browse or download may be stored on your computer to enhance performance. Clearing your browser's cache ensures that these local copies are removed.

Your Password You should keep any passwords you use confidential and change them frequently. Avoid using the same password for different websites, applications, or services, particularly when they relate to different entities.

We would advise you, for your own security, not to use common information such as your birthday, telephone number or a recognizable part of your name as your password. We also advise that you do not use the same or similar user name or passwords for accessing other services (such as your user name and password for connection to the internet or to access other websites).

For your protection, please do not access the Citi Private Bank website through hyperlinks embedded in emails. This will avoid the possibility of being directed to fake websites, which may seek to obtain financial information about you, for example, by asking you to disclose confidential information such as account numbers.

Linked sites and information

For your convenience, hyperlinks may be inserted in our sites (linked pages): We are not responsible for, and this Online Privacy Statement does not apply to, the privacy practices of any linked sites or any companies or individuals not affiliated to Citi. Linked sites may collect information in addition to that which we collect on our Sites. We do not endorse any linked sites, or any services or products that may be described or offered on such linked sites, or any of the content contained on linked sites. We encourage you to seek out and read the privacy policy or privacy notice of each linked site that you visit to understand how the information that is collected about you is used stored, and protected.