

# Swiss Federal Data Protection Act (FDPA) Information Notice

Citi Private Bank Citi Global Wealth at Work

1 September 2023



This notice is intended to provide you with the essential information about the Swiss Federal Data Protection Act, as amended from time to time (the "FDPA").

The initial version of the FDPA dated back to 1992 and was considered out of date given the increasing amount of digitalization. Consequently Switzerland decided to revise the FDPA as of 1 September 2023 to strengthen consumer rights and modernize the provisions. The revision shall also align the Swiss data protection framework more closely with European law, particularly with the European General Data Protection Regulation (GDPR).

Further information can be found at: <a href="https://www.kmu.admin.ch/kmu/en/home/facts-and-trends/digitization/data-protection/new-federal-act-on-data-protection-nfadp.html">https://www.kmu.admin.ch/kmu/en/home/facts-and-trends/digitization/data-protection/new-federal-act-on-data-protection-nfadp.html</a>.

The provisions of this notice apply to, and should be read alongside, the 'Privacy Statement (EMEA) - Citi Private Bank / Citi Global Wealth at Work' as amended from time to time (the "Privacy Statement") available on <a href="https://www.privatebank.citibank.com/newcpb-media/media/documents/citi-private-bank-emea-privacy-statement-aw-web.pdf">https://www.privatebank.citibank.com/newcpb-media/media/documents/citi-private-bank-emea-privacy-statement-aw-web.pdf</a>.

Where there is a conflict or ambiguity between the Privacy Statement and this notice, this notice takes priority. The terms used in this notice have the same meaning as defined in the Privacy Statement.

## When does this notice apply to you?

It applies:

- 1. if you, or the corporate or institution you are associated with, receive services (or may prospectively receive services) from a Citi entity, branch or office in Switzerland, including Citibank (Switzerland) AG or Citibank N.A. (Geneva and Zurich Branches); or
- 2. in some cases, if you are resident in, or located in Switzerland while you receive services from data controller(s) established outside of Switzerland mentioned in the Privacy Statement, noting that this notice is supplemental to any applicable privacy statement(s), notice(s) or circular(s) issued by such data controller(s). For further information on how the relevant data controller(s) located outside of Switzerland, the European Economic Area, Jersey and the United Kingdom process information about you, please refer to other privacy notices set out <a href="https://www.privatebank.citibank.com/privacy">https://www.privatebank.citibank.com/privacy</a>.

When we refer to Citi, we mean the Citi entities listed above that are relevant to you. In almost all customer relationships Citi will act as an independent data controller. Exceptionally Citi will act as a data processor including in payment agency and similar agreements where we act only on your instructions and neither exercise any discretion nor process data for compliance with applicable law. This notice is applicable where we act as a controller unless otherwise indicated in a contract where we hold ourselves as a data processor.

#### How can you contact us?

The contact details for the data controllers can be found in the applicable Privacy Statement. If you have any questions or requests in relation to this notice, please contact your Private Banker or the Swiss Data Protection Advisor as set out below.

Swiss Data Protection Advisor Citi Hardstrasse 201 8005 Zurich Switzerland

Email: <a href="mailto:swissdataprotectionadvisor@citi.com">swissdataprotectionadvisor@citi.com</a>

#### Why do we process your personal data?

For details on how we process your personal data, please refer to the Privacy Statement.

#### Where do we obtain information about you?

For further information on how we obtain information about you, please refer to the Privacy Statement.

#### To whom do we disclose your personal data?

For details on how we disclose your personal data to others, please refer to the Privacy Statement.



#### Where do we transfer your personal data?

For details on where we transfer your personal data, please refer to the Privacy Statement (in particular to the link in Section 1.2) as well as the list of jurisdictions in the Appendix to this notice. For transfers to countries not providing adequate data protection, as published by the Swiss government from time to time, we maintain appropriate safeguards or proceed on the basis of valid exemptions within the meaning of the FDPA. For further information on the safeguards that we put in place, please refer to the Privacy Statement.

#### For how long do we store your personal data?

For further information on how long we store your personal data, please refer to the Privacy Statement.

### What automated decision-taking does Citi carry out?

For details on what automated decisions we carry out, please refer to the Privacy Statement.

#### What are your rights in relation to personal data?

For information on your right in relation to personal data, please refer to the Privacy Statement. In addition to the rights mentioned in the Privacy Statement, you may request that a note of contest is added in case if neither the accuracy nor the inaccuracy of the personal data in question can be established.

### Changes to this notice

If we modify this notice at any time you will be able to find the modified versions on our website at <a href="https://www.privatebank.citibank.com/privacy">https://www.privatebank.citibank.com/privacy</a>. We encourage you to regularly check the website to ensure that you are always up to date and to download and save the respective documents if and where required.



# **Appendix**

#### List of Jurisdictions

Argentina Germany Philippines Australia Poland Hong Kong Austria India Romania Bahamas Serbia Indonesia Bahrain Ireland Singapore Belgium Israel South Africa South Korea Brazil Italy Canada Japan Spain Cayman Islands Jersey Sweden Chile Luxembourg Switzerland Thailand China (People's Republic of) Malaysia

DenmarkMonacoUnited Arab EmiratesEgyptNetherlandsUnited KingdomFranceNew ZealandUnited States

Your personal data may be transferred to countries that are not listed above in some circumstances, for instance (i) when instructing international payment transactions or (ii) using financial products and/or services offered in or linked to such countries.