



Privacy Statement (EMEA)

Citi Private Bank

Citi Global Wealth at Work

16 August 2024

This Privacy Statement explains how various Citi entities within the Europe, Middle East & Africa (EMEA) region (as listed in the Annex at the end of this Privacy Statement) process personal data of clients or prospective clients, and their beneficiaries, family members, signatories, attorneys, representatives and associates (**you**) for Citi Private Bank and/or Citi Global Wealth at Work services.

This Privacy Statement is effective as of 14 September 2024.

1. When does this Privacy Statement apply to you?

1.1 It applies if:

- a) you, or the corporate or institution with which you are associated, receive Citi Private Bank and/or Citi Global Wealth at Work services (or may prospectively receive such services) from an EMEA Citi entity, as listed in the Annex at the end of this Privacy Statement; and/or
- b) you are resident in, or located in, in a Members State of the European Union (**EU**), the European Economic Area (**EEA**), the United Kingdom (**UK**), Switzerland or Jersey while you receive Citi Private Bank and/or Citi Global Wealth at Work services from a data controller established outside of EMEA, as listed in the Annex at the end of this Privacy Statement, noting that this privacy statement is supplemental to the privacy statements referred to in section 13.

1.2 When we refer to **Citi**, we mean the EMEA Citi entities listed in the Annex at the end of this Privacy Statement that are relevant to you. In almost all customer relationships, Citi will act as an independent controller. Exceptionally, Citi may act as a 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.

2. How can you contact Citi?

2.1 The contact details for the controllers can be found in the Annex at the end of this Privacy Statement.

2.2 If you have any questions or requests in relation to your personal data, please contact your Private Banker or the Data Protection Officer/Representative/Advisor as set out below. We are happy to discuss other methods of contacting us if you have difficulty with email or post.

EU/EEA	UK/Jersey	Switzerland
EU/EEA Data Protection Officer Citi 1 North Wall Quay Dublin D01 T8Y1 Ireland Email: gdprdpo@citi.com	UK Data Protection Officer Citi Citigroup Centre 25 Canada Square London E14 5LB United Kingdom Email: gdprdpo@citi.com	Swiss Data Protection Advisor Citi Hardstrasse 201 8005 Zurich Switzerland Email: swissdataprotectionadvisor@citi.com

3. Why does Citi process your personal data?

We process your personal data for the reasons set out below, relying on the stated lawful bases of processing. In some instances there may be more than one lawful basis for processing, although we have included only one lawful basis below. Should you require more information on potential additional lawful bases for processing, please contact us using the details set out above.

Purposes of Processing	Associated Lawful Basis of Processing
<ul style="list-style-type: none"> To provide financial services and products and/or ancillary services to you where you have a contract with us and to operate, maintain, and manage your account(s) pursuant to that contract. This includes processing of instructions and generation of confirmations, advices and statements and the carrying out of instructions. For pre-contract processing you request or we believe you require prior to entering into a contract with us, including to assess your needs in relation to specific products or services and to determine the level of advice, asset management or support that you need. When you or our client instruct(s) us to make a payment from an account to a third party's account. To allow a third party payment provider to access your personal and transactional data and/or initiate payment transactions as described in your account terms and conditions. 	<p>Where the processing is necessary for us to perform a contract with you or for requested pre-contract steps</p>
<ul style="list-style-type: none"> To disclose information to governmental entities or regulatory authorities, financial markets, brokers or other intermediaries or counterparties, courts or other parties. To conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions, anti-terrorism laws and regulations and fighting financial crime. This includes know your customer (KYC) screening (which involves identity checks and verifying address and contact details), "politically exposed persons"(PEPs) screening (which involves screening client records against internal and external databases to establish connections to "politically exposed persons" as part of client due diligence and onboarding) and sanctions screening (which involves the screening of clients' details against published sanctions lists). If you are unwilling to provide your personal data in these circumstances, then we may be unable to provide (or continue providing) the relevant product or service to you or our client. For AML and transaction reporting purposes or any other reporting required by our regulators. To disclose information in relation to you and/or our client in order to comply with any shareholder identification and disclosure request received from any company; For tax purposes. To assess if investments are suitable or appropriate for you based on your investment knowledge and experience. To investigate and remediate any security incidents and/or data protection breaches in any of our information systems. 	<p>Where we are required by applicable domestic law (UK, Jersey, EU and Switzerland being the Relevant Jurisdictions)</p>
<ul style="list-style-type: none"> To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity. To provide financial services and products and/or ancillary services to our clients/prospective clients and to communicate with you about these, including for marketing purposes, unless we need consent to provide that service or communication. To assess the needs of our clients or prospective clients in relation to specific products or services, to assess whether our clients are eligible for particular products, to determine the level of advice, asset management or support that a client needs or carry out transactions in compliance with contractual obligations. To assess whether any other Citi businesses might have any products or services which we believe would be of interest to any corporate entities that you are associated with. To manage and administer Citi's business and to manage and improve relationships with you and our clients and assist with client management and for marketing and business development activities and analysis. To inform you about our products or services or any products and services of any Citi Companies, to the extent permitted by law and subject to your contact preference options. To monitor and analyse the use of Citi services, for risk assessment and control, for statistical and trend analysis, for system administration, operation, testing and support and to operate control systems and management information systems. To carry out a credit analysis in relation to your ability to repay any credit facility that you have requested from us. To manage our information technology, and data and to ensure the security of our systems. To disclose information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors or other third parties including third parties who assist us in complying with our regulatory or legal requirements, and to conduct compliance activities, when we think this is in our, or someone else's interests, but where law 	<p>Where necessary for our or a third party's legitimate interests (as listed here) and where your interests and fundamental rights do not override these interests</p>

<p><i>of the Relevant Jurisdictions does not require us to make this disclosure or conduct these activities.</i></p> <ul style="list-style-type: none"> • <i>To meet a regulatory obligation in a country outside the Relevant Jurisdictions.</i> • <i>To disclose information to other Citi entities or third parties, including those outside the Relevant Jurisdictions in order to best assist us with complying with our regulatory requirements.</i> • <i>To establish, exercise or defend legal claims and in order to protect and enforce Citi's rights, property, or safety, or to assist our clients or others to do this.</i> • <i>To investigate and respond to any complaints about us or our business or any incidents relating to us or our business and to help maintain service quality and train staff, to deal with complaints and disputes.</i> • <i>To make certain assessments about you and profile you in order to assess your investment objectives, risk tolerance, and understanding of investment risk to assess your ability to repay any loans and to generally tailor our service to your needs.</i> 	
<ul style="list-style-type: none"> • <i>To carry out compliance activities using sensitive information and your consent is required by the laws of the Relevant Jurisdiction.</i> • <i>For compliance with any regulatory requirements where we use a third party service provider to assist us comply with our requirements and your consent is required by the laws of the Relevant Jurisdiction.</i> • <i>For direct marketing from Citi, and your consent is required by the laws of the Relevant Jurisdiction.</i> • <i>For the provision of payment services, and your consent is required by the laws of the Relevant Jurisdiction.</i> 	<p>In some countries, we rely on other legal justifications than consent.</p> <p>Where we rely on your consent, you can withdraw it at any time. However, please consult with your Private Banker if you have concerns in relation to consent and before refusing or revoking consent because if we need your consent to process certain types of sensitive information, we may not be able to provide, or continue to provide, some or all of our services to you or our clients without such consent. If you withdraw consent, this will not affect any processing of your information which has already taken place by that date.</p>

4. What personal data does Citi process about you?

Depending on your relationship with us, we may collect and process personal data including the following categories:

	Processing in the context of Clients and Prospective Clients
Personal information (such as name, place of birth, nationality, gender and other identification information and national identity card or passport)	✓
Contact information (such as email address, telephone number, address)	✓
Family information (such as marital status)	✓
Information relating to professional profile (such as employment details, directorships and professional qualifications) and information related to company ownership	✓
Tax information (including taxes, tax codes and tax domicile information)	✓
Transaction and financial information (such as bank account numbers, credit and debit card numbers, payment and transaction records, statements, information relating to assets and liabilities, financial statements, revenues, earnings, investments and investment objectives)	✓
Your level of knowledge of, and experience in, investment matters	✓
Details of our interactions with you and the products and services you use	✓
Records of any calls or communications	✓
Identifiers we assign you	✓
In some cases (where permitted by law), special categories of personal data, such as your health data, religious beliefs, political opinions or affiliations, information relating to criminal convictions or offences as well as other sensitive data as defined by the laws of the Relevant Jurisdiction	✓
If our relationship is because of an insurance policy or claim, other personal data including about lifestyle, health, criminal convictions or related information	✓
Information we learn about you from our communications and dealings with you, such as data and cookies collected from your interactions with our website and InView (subject to your cookie choices), information that we gather from the technology which you use to access our services (including IP address, device ID data) and information about Citi publications and products you interact with in third party platforms and your responses when we send you emails and other communications (subject to your marketing contact preferences)	✓

If you are an account beneficiary, we collect and process your personal information, contact information and family information as listed in the table above only.

5. Where does Citi obtain information about you?

Some information is provided by you and we also obtain some information about you from other sources, as set out below:

(a) Our clients	A prospective or existing individual, corporate or institutional client of ours may provide us with information in relation to you if you are associated with that client and/or they think you may be interested in our products or services. Our clients who give us this information may be based inside or outside your country (or the EU, if your country is an EU Member State). We obtain information such as your name, company, title and job description and contact details including email address and telephone number or business address.
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(b) Public sources	Sources both inside and outside your country, the Relevant Jurisdictions, such as news outlets, websites and other media sources, international sanctions lists, any publicly available databases, or data sources. Data we may obtain may include your name, company, title and job description and contact details such as email address, telephone number or business address, details about your personal or business interests or activities.
(c) Other sources	Any research agencies who may carry out research on our behalf, perform background checks upon our instruction or may offer us research subscription services both inside and outside your country, the Relevant Jurisdictions. The data we may obtain could include any of the data listed in sections 5.1(a) and (b).

6. To whom does Citi disclose your personal data?

We disclose your personal data to others as follows:

- 6.1 to any Citi Company for the purpose of managing our and their relationship with you and/or, where appropriate, so that we (as their intermediaries) or they may offer their products and services to you or, where permitted, to any corporate entity associated with you, including any company in which you may be deemed a shareholder and where we may be required to disclose your information under applicable law, or any third party nominated by such company, and for any other purposes identified in this Privacy Statement and to any Citi Company that in any way assists us in carrying out our business or in providing products and services to our clients (including where that Citi Company assists us to assess the risk with any credit we provide to you). When we refer to a **Citi Company** or **Citi Companies** we mean any Citi affiliate within our group now or in the future. This includes the entities that can be found in the links on this webpage from time to time: <http://www.citigroup.com/citi/about/countrypresence/>;
- 6.2 to our client in connection with the products and services we provide, and for any other relevant purposes set out in this Privacy Statement;
- 6.3 at the request of any counterparty bank, payment infrastructure provider, custodian, sub-custodian, fund house, fund administrator, issuer of securities (including their affiliates), or other third party, engaged in relation to any payment or investment or business process and to service your accounts and investment as per the provisions of any specific product or service agreement relevant to such investment or service. If you are deemed to be an ultimate beneficial owner of a company or legal entity of a Relevant Jurisdiction, your personal data may be required to be made available on a central public register of beneficial owners in the relevant jurisdiction in accordance with applicable law;
- 6.4 in respect of any lending, to any insurance providers or valuers who assess the adequacy of any security provided, any obligor or guarantor or any prospective assignee or transferee or sub-participant, any person or entity in connection with any securitisation of all or any part of our loan assets, any insurers (including credit insurers) or hedge counterparty, or any of their affiliates or our affiliates;
- 6.5 to other Citi Companies and third party service providers who in any way assist us in carrying out our business or in providing products and services to our clients or prospective clients, or assist us in complying with any applicable legal or regulatory requirement, including parties who provide printing and mailing (including electronic mailing) facilities to us, storage and archiving facilities and parties who assist us to manage our information technology and to provide our clients with digital options to interact with us;
- 6.6 to other Citi Companies and third-party service providers who assist us with our regulatory reporting obligations and with the processing of instructions, transactions and the generation of confirmations, advices, statements or any other information that we are required to provide to you;
- 6.7 as required to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our clients and to protect the rights, property, or safety of us, our business, any Citi entities, our clients or others including to legal, tax or other professional advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
- 6.8 to any competent regulatory, prosecuting, tax or governmental authorities, courts, and or other tribunals in any jurisdiction where we are required to do so under the relevant law (including law of the Relevant Jurisdictions, but also other applicable laws) or we otherwise deem it is appropriate to share the information. This may include any of the following circumstances: (i) for or in connection with an examination of us by bank or other examiners; (ii) pursuant to subpoena or other legal process; (iii) at the express direction of any other authorised government agency; (iv) to our internal or external attorneys or auditors; (v) to others to whom we are required to make such disclosure by applicable law; and (vi) to anyone where we deem it is appropriate in order to meet our legal obligations (including under law of the Relevant Jurisdictions, but also under other applicable laws); and
- 6.9 to third parties in connection with a change of ownership in our business or any of our assets.

7. Where does Citi transfer your personal data?

- 7.1 We transfer your personal data to Citi Companies and to third parties (such as banks, security exchanges and financial or account service providers and other service providers) who are located both in the jurisdiction where you hold your account (or would hold an account if you are a prospective client) and outside that jurisdiction. This may include data being transferred by us, for the reasons outlined in this Privacy Statement, to Citi Companies and third parties outside the Relevant Jurisdictions. We may also use cloud services providers to process your data under appropriate technology and operational security measures.
- 7.2 In general, your data is stored by the Citi entity with whom you have an account and/or (if different) the Citi entity which employs the banker or other Citi advisor with whom you are corresponding. Your data will also be stored on a regional database. The regional database for clients booked with our EMEA booking centres is in Switzerland. In addition, in order to ensure global consistency, enhance security and facilitate quicker delivery of services to you, we may also copy all the data held in each regional database to our other regional databases. This means that your data can be held in duplicate in the regional databases in the United States, Singapore, Japan and Switzerland.
- 7.3 For transfers outside the Relevant Jurisdictions, we maintain physical, electronic and procedural safeguards, including data transfer agreements under UK and European Commission-approved standard contractual clauses within Citi or with the relevant third party, to protect your personal data. These mechanisms vary over time.

7.4 Where your accounts and data are multi-jurisdictional and managed jointly with offices in other countries, such data may become subject to the legal disclosure requirements of other countries, which may have differing laws relating to the degree of confidentiality afforded to client information and such data may become subject to the laws and disclosure requirements thereof.

8. For how long does Citi store your personal data?

Where we process personal data in connection with performing an agreement (or certain pre-contractual or other non-contractual steps) we have with you or our client, we keep your personal data for as long as is required to fulfil our obligations to you or our clients and such other suitable period reflecting the statutory limitation period under the laws of that agreement.

Where we process personal data in connection with a legal obligation (for example for AML purposes) such personal data will be kept for as long as is required under the relevant local law.

Where we process personal data solely with your consent, we process the personal data for as long as is necessary or you ask us to stop, and for a reasonable period afterwards to allow us to comply with your request.

Where we process personal data in connection with our or a third party's legitimate interests and where your interests do not override these interests, we keep your personal data for as long as is necessary to comply with such purposes and any legal obligation, or until you object to such processing and there is no other reason for us to process it.

Generally, we will store data about you for as long as you continue to have a relationship with us and for a suitable period after any such relationship has terminated to ensure that we meet any regulatory data retention requirement in the booking centre where you held an account.

9. What automated decision-taking does Citi carry out?

- 9.1 We generally do not use any automated decision-making in providing services to you. However, we may use automated decision-making in relation to an automated loan offering facility. Where we do so, we will inform you at the point of application that we engage in this type of activity, provide further information about what is involved, explain the significance, and envisaged consequences of the processing for you.
- 9.2 For the activities described in Section 9.1, we will seek your consent for this unless we must do it in order to enter into, or to perform, a contract with you or where we are authorised by law in the Relevant Jurisdictions, as appropriate, to carry out this activity. You have the right to request a person to re-assess any decision.

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

- 10.1 You can ask us to: (a) provide a copy of your personal data; (b) correct your personal data; (c) erase your personal data; (d) transfer your personal data to other organisations; and (e) restrict processing of your personal data. You can also object to some processing of your personal data, including in relation to direct marketing and where we process your information because this is in our legitimate interests (see Section 3). These rights may be limited in some situations; for example, where we are required to process your personal data by law. You may also at any time withdraw your consent (see Section 3).
- 10.2 You can change your marketing preferences at any time by contacting your Private Banker.
- 10.3 If you wish to exercise these rights or if you have any queries about your personal data, please contact your Private Banker or the Data Protection Officer/Representative/Advisor using the contact details in Section 2 above. You also have the right to complain to the relevant data protection supervisory authority that regulates the processing of your personal data.

United Kingdom	The Information Commissioner's Office (ICO)	Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Website: https://ico.org.uk/global/contact-us/ Phone: +44 1625 545 700
Jersey	Jersey Office of the Information Commissioner	Address: 2 nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT Website: https://jerseyoic.org/ Phone: +44 (0) 1534 716530
European Union and the European Economic Area	The Data Protection Commission Ireland (DPC)	Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland Website: https://dataprotection.ie/en/contact/how-contact-us Phone: +353 (0)761 104 800
Switzerland	Federal Data Protection and Information Commissioner (FDPIC)	Address: Feldeggweg 1, CH - 3003 Bern Website: https://www.edoeb.admin.ch/edoeb/de/home/deredoeb/kontakt/kontaktformular_datenschutz.html Phone: +41 (0)58 462 43 95

11. How do we monitor our obligations to protect your personal data?

We take protection of your personal data very seriously and have implemented a global information security program based on input from regulatory authorities and recognised industry standards. While data protection is a priority for all staff, our regional and global information security officers are responsible for implementation and monitoring of the security program, including risk assessments, security plan development and maintenance, correction action and audits. The threat landscape is constantly monitored and we subscribe to industry-leading vulnerability monitoring services. We invest in expert intelligence gathering

services to help protect our systems and data from unauthorised access, including vetting and ongoing monitoring of our third-party service providers. Extensive training is undertaken by all staff, and our security officers ensure data protection awareness throughout Citi.

12. Information about the Swiss Federal Data Protection Act

If you are a client or prospect of Citibank (Switzerland) AG and/or Citibank N.A., Sioux Falls, Zurich and Geneva Branches the treatment and transfer of your personal data is governed by applicable Swiss laws and regulations, such as the Swiss Federal Data Protection Act (as amended from time to time), and (as a client) the applicable Swiss General Terms and Conditions or product terms. The Swiss Federal Data Protection Act may also apply to you if you are resident in, or located in Switzerland while you receive services from data controller(s) established outside of Switzerland. For further information on this, please refer to the Swiss Federal Data Protection Act Information Notice available at <https://www.privatebank.citibank.com/privacy>.

13. Information about personal data protection laws in the United States, Latin America, Singapore and Hong Kong

If you are receiving services from a Citi entity referred to in Section 1.1(b) of this Privacy Statement, your data will be subject to the legal framework of the jurisdiction of that entity and the provisions of this Privacy Statement will be supplemental to the local privacy statement, notice or circular applicable to that entity.

For the United States and Latin America: [Citi Private Bank \(NAM & LATAM\) Privacy Notice](#)

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](#)

14. Information about personal data protection laws in other jurisdictions

If you are resident in or otherwise impacted by privacy legislation of any other jurisdiction not included in Sections 12 or 13, your data may also be subject to the legal framework of that jurisdiction and the provisions of this Privacy Statement will be supplemental to any local privacy statement, notice or circular found at <https://www.privatebank.citibank.com/privacy>.

15. Changes to this Privacy Statement

If we modify this Privacy Statement at any time you will be able to locate the modified versions on our website at <https://www.privatebank.citibank.com/privacy>. We encourage you to regularly review this Privacy Statement to ensure that you are always aware of what personal data we collect and how we use, store and disclose it.

Annex

Details of Citi Private Bank controllers by region:

Europe, Middle East & Africa (EMEA)

- Citibank, N.A., London Branch, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. Telephone +44 207 7500 5000
- Citibank, N.A., Jersey Branch, P.O. Box 104, 38 Esplanade, St. Helier, Jersey, JE4 8QB, Channel Islands. Telephone +44 1534 60 8000
- Citibank, N.A., Sioux Falls, Geneva Branch, Quai de la Poste 2, 1204 Geneva, Switzerland. Telephone +41 58 750 7000
- Citibank, N.A., Sioux Falls, Zurich Branch, Hardstrasse 201, 8005 Zurich, Switzerland. Telephone +41 58 750 7000
- Citibank (Switzerland) AG, Hardstrasse 201, 8005 Zurich, Switzerland. Telephone +41 58 750 5000
- Citi Global Wealth Management S.A.M, 9 boulevard des Moulins, 9800 Monaco, +37797975010
- Citibank Europe plc, 1 North Wall Quay, Dublin 1 Ireland. Telephone +353 1 622 2000
- Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. Telephone +44 20 7500 5000
- Citibank Europe plc, Spain Branch, Calle Jose Ortega Y Gasset 29, 2nd Floor, 28006, Madrid, Spain. Telephone +34 915384400
- Citibank Europe plc, Italy Branch, Milan, Via dei Mercanti number 12. Telephone +39 02 89061
- Citibank Europe plc, Luxembourg Branch, 31, Z.A. Bourmicht L-8070 Bertrange, Grand Duchy of Luxembourg. Telephone +352 45 14141
- Citibank Europe plc, France Branch, 21-25, rue Balzac, 75008 Paris, France. Telephone +33 17 6760 600
- Citibank Europe plc, Germany Branch, Reuterweg 16, 60323 Frankfurt am Main, Germany. Telephone +49 69 1366 5555

North America and Latin America

- Citibank, N.A., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559-000
- Citigroup Global Markets Inc., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559-1000
- Citi Private Alternatives LLC, 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559-1000
- Citicorp USA Inc, 388 Greenwich Street, New York, NY 10013, United States. Telephone +1 212-559-1000
- Citicorp North America Inc, 388 Greenwich Street, New York, NY 10013, United States. Telephone +1 212-559-1000
- Citibank Canada, 123 Front Street West, Suite 2000, Toronto, Ontario, M5J 2M3. Telephone +1-416-947-5300
- Citibank Canada Investment Funds Limited, 123 Front Street West, Suite 2000, Toronto, Ontario, M5J 2M3. Telephone +1-416-947-5300

Asia Pacific

- Citibank, N.A., Hong Kong Branch, 30/F, Champion Tower, 3 Garden Road, Central, Hong Kong. Telephone +852 3419 8522
- Citibank, N.A., Singapore Branch, 8 Marina View, #20-01 Asia Square Tower One, Singapore 018960. Telephone +65 6595 7777
- Citibank, N.A., India Branch, FIFC, 14th Floor, Plot Nos. C-54 & C-55, Block G, Bandra Kurla Complex, Bandra (East), Mumbai, 400 098. Telephone +91 22 6175 9999