

Citi Institutional Clients Group Global Privacy Notice

Effective Date: 11 November 2022 (Updated () June 2023)

Scope and Applicability

This Global Privacy Notice describes how we process personal information or personal data in connection to banking or financial services we provide to corporate entities and institutions* and their service recipients. It applies to any terms that refer or link to it.

Our global business units are located mainly in the United States, [the European Economic Area](#), [the United Kingdom](#), Japan, [Hong Kong](#) and [Singapore](#). This Global Privacy Notice has Supplemental Provisions for countries and territories that use or adopt it. Please refer to the link relevant to our services in your country or territory.

We also have Privacy Notices for other countries and lines of business that have not adopted this Global Privacy Notice. Some of these are listed in the Annex, in Section 13.

At Citi your privacy is our priority. Our **Institutional Clients Group (ICG)** provides **banking and financial services to corporations, financial institutions, public sector organizations, investment managers, and service recipients in over 95 countries, and comprises the following business areas:**

Global Markets

This business unit comprises broker/dealer exchange and traded serviced products, including Commodities, Derivatives, Equities, Futures, FX, OTC operations, securities clearing and similar.

Securities Services

The Security Services business unit comprises agency securities, lending and directed agent investment services, direct custody and clearing, global custody, global fund services; and corporate, compliance and investment monitoring and similar services.

Banking, Capital Markets and Advisory

BCMA comprises investment and corporate banking, advisory services in relation to corporate mergers, divestitures and acquisitions. BCMA structures and provides lending within corporate loans, syndicated loans, and capital (debt and equity) markets origination and ancillary products.

Citi Issuer Services

Our issuer services provide payment and security agency, trust, and depositary receipts.

Citi Commercial Bank

Our commercial bank services provide accounts, banking products, securities, commercial loans and guarantees and similar core banking services to corporate clients.

Treasury and Trade Solutions (TTS)

TTS provides commercial payment and receivables solutions, digital cash management and trade data, liquidity management service solutions and similar services.

This is a comprehensive document that sets out the principles under which we process your personal information and describes your rights, and ways to exercise them. It does not replace contractual terms and conditions, nor does it override any rights or statutes applicable to you or our products.

Also, this document does not substitute nor modify other Privacy Statements or Notices for corporate and institutional clients in certain countries that have not adopted this Global Privacy Notice or other business lines, including retail banking.

Please read:

- a) The terms and conditions for details about our services and the confidentiality in our operations.
- b) The Supplemental Provisions applicable to the country or territory where services are provided (see [Section 12.a](#))
- c) the Digital Platforms supplement, which describes how we use technical personal information from our online banking and mobile applications (see [Section 12.b](#))

Important: TTS lines of business and the Commercial Cards program in Europe are not in scope of this Global Privacy Notice. You can access specific TTS privacy statements by following this [link](#)

Definitions

In this document we use the following terms:

“You” means any individual or natural person whose information or personal data we process in relation to financial services that we provide to Your Organization, or other service recipients.

“Your Organization” is the corporation or institution you are associated with as an employee authorised representative, director, shareholder or client, as the case may be.

“Personal Information” or **“Personal Data”** are equivalent terms to mean any information or data:

- that identifies or can be used to identify you.
- that relates to, describes, is capable of being associated with, or could reasonably be linked (directly or indirectly) with you; or (alternatively)
- that can be used to authenticate you or provide access to a business account.

US Residents: We do not process Personal Information from other members of your household, other than where we are required by law for the purposes of risk and crime prevention.

“Sensitive Personal Information” or **“Special Categories of Personal Information”** are terms that refer to categories of Personal Information that require special handling due to their inclusion of racial and ethnic origin, religion, medical information, political or philosophical positions and biometric data. Personal information that has been aggregated and anonymised data is not considered Personal Information for purposes of this Privacy Notice.

We will only process Sensitive Personal Information or Special Categories of Information with your consent, unless applicable law allows us to process under another legal basis (for example complying with a legal obligation). In order to prevent its involuntary processing please do not provide Sensitive PI or Special Categories of PI about yourself or anyone else unless so required. If we receive such information by accident or happenstance, we will let you know immediately and take measures to dispose of it.

Changes to this Privacy Notice

We may modify this Privacy Notice from time to time, to adapt it to changes in our products and services. Where changes are made, we will post a new version on this site. We will also inform Your Organization as appropriate and in the manner set out in our terms and conditions.

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1. ENTITIES RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION

The legal entity (entities) that provide the accounts, products and services You are receiving in the name of Your Organization, is (are) in most cases responsible for determining any Personal Information that is collected, the

purposes the information is collected for, and how it will be processed. Those entities are the **Data Controller(s)**, also known as Data User(s) under the laws of certain countries.

In certain cases, we may act as a **Data Processors, that is to say as custodians or operators (and not as Data Controllers): when we process payments and transactions** on behalf of merchants and other banks or card issuers, and will collect and use information as described in our mandate or contract, and not under this Global Privacy Notice.

Data Controllers

Please refer to the Country or Territory Supplements for a list of Data Controllers where services are provided. A global list of Citi branches and affiliate is available [here](#).

2. SOURCES OF PERSONAL INFORMATION

From Your Organization

We obtain information from **Your Organization** or from services we provide to **third parties**, such as financial institutions, and from government entities, credit bureaux, and companies specialised in background checks.

From You

We obtain information **directly from You** from various sources:

- **Account activities:** bill payments, deposits, withdrawals, investments, other transactions).
- **Forms and Applications:** product variation or modification, lines of credit and credit limit increases, signatory names and signature sample forms, and electronic instructions).
- **Electronic and verbal communications with you, your banking representatives, or our corporate clients:** calls to our trading desks, client service desks, text and electronic messages and any other communications we receive from you, Your Organization, institutions you are employed by or other third parties. We do this for the purposes of documenting instructions from you, authentication, and for the purposes of security and quality assurance.
- **Citi Digital Platforms.** We process technical data and personally identifiable data related to transactions you perform in our Internet sites and mobile applications, in accordance with your contact preferences, cookie and profiling choices. Please refer to the Digital Platforms Supplement for more information.

From Third Parties

- We obtain personal data from international sanctions lists, financial market infrastructures including settlement services providers, securities depositories, stock exchanges, OTC or private operators, clearing counterparties and similar sources.

- We conduct background checks and obtain data from external monitoring service providers.

As required and/or permitted by law, we also monitor and record telephone, email, instant messaging, and other online communications with us have resulted or may result in a banking or financial transaction.

3. CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND PROCESS

Collection of Personal Information

Citi collects personal information about you, for purposes indicated in this Privacy Notice.

The **categories** of personal information that we process, with their elements include:

- **Your identity:** name, organization, title, and job description within Your Organization.
- **Business contact details** in Your Organization, such as business and email address, and your telephone number.
- **Information about your banking authorizations** as an officer or attorney in fact for Your Organization, and your interactions with us in relation to Your Organization.
- **Your interactions with us**, your preferences and methods of communications, and your service and marketing preferences.
- **Information relating to your personal assets**, as part of our Know Your Client (KYC) legal and regulatory obligations, and for identifying your holdings in the ownership structure of Your Organization and other corporate entities you are associated with.
- **Information relating to your financial and credit background**, and your personal address, in order to open and maintain accounts, products, and services contracted for you by Your Organization.
- **Information required for specific legal or regulatory purposes** including anti-money laundering (AML) and/or sanctions and investor screening processes (e.g., copies of your passport or signature specimens) or for transaction performance and management purposes.
- Personal Data gathered from contracts or arrangements Your Organization has opened with us.

Collection of Sensitive Personal Information or “Special Categories of Data”

Where required by law, we process sensitive information (special categories of personal data), your Social Security and other national identity indicators. We have systems that compartmentalize such information, and operational, technical and governance measures, including access controls that protect the confidentiality and security of all information.

We only collect and process personal information that is necessary for us to provide our services and as required by business, legal, and regulatory aims. We will offer detailed information and additional disclosures if appropriate where we collect or otherwise process special categories of personal data, such as biometric or behavioural personal data that we obtain from your interactions with our systems and applications, including by way of example your mouse speed and movements, your keyboard usage, and voice pattern recognition for telephone banking. When we use the built-in biometric authentication technology in your mobile device, we do not have access to your biometric data, which remains stored in your mobile device.

Collection of Digital Personal Information

The following information pertains to Internet pages open to the public, our clients, and visitors. For information on internet banking and banking on mobile applications please read the [Information for Digital Platforms in Section 12.b](#).

- **Information from your device and your use of digital resources:** We obtain technical information when you access our Internet sites, including data about the device, operating system, mobile network, IP address (all of these “digital identifiers”), browser type, and mobile app version. We also collect information about your activity on our Services to prevent fraud and unlawful activities.
- **Cookies and Trackers:** We collect information about your use of our digital services through technologies such as cookies web beacons and trackers, which collect the following data:
 - Information about your use of our services and the device you use to access our services.
 - Citi pages you request and visit and your comments or posts on these.
 - Information on your interaction with other pages where we publish content.
 - Information obtained in the course of maintaining or supporting the our IT service platforms.
 - Information about your device MAC and IMEI identifiers, your IP address or network, and the URLs of Internet sites from which you arrive or leave our Internet sites.
 - Your type of browser, operating system, your mobile network provider and the make and size of your device, to display or Internet pages correctly and for compatibility.

Cookies are small data files stored on your hard drive or device memory that help us, among other purposes to:

- Improve our Services and your experience.

- Know which areas and features of our Services are popular.
- Count visitors.

Web beacons are electronic images that may be used in our Services or emails and help among other purposes to:

- Deploy cookies.
- Count visits.
- Understand usage and effectiveness of our marketing campaign.

Our Internet sites have their Cookie Policies, that are separate from this Global Privacy Notice. Please consult our [Cookie Policy for ICG Clients](#).

4. PURPOSES AND USES OF PERSONAL INFORMATION

We use your Personal Information for the following purposes:

- Communicate with you in relation to banking and financial services provided to Your Organization:
 - To verify your identity and communicate with you.
 - To improve relationships with you and Your Organization.
 - To inform you about products and services Your Organization has, and to offer other services that may be of interest for Your Organization (subject to your marketing preferences).
- Deliver our services to Your Organization:
 - To provide our products and services, including opening and maintaining accounts for your Organization.
 - To manage and administer our banking business.
 - For system and IT network administration, and for the operation, testing and support of our Digital Platforms.
 - To enable third parties to deliver products or services on our behalf, including payment services.
 - In communicate with credit reference and financial background research agencies.
 - To meet our obligations to and cooperate with stock exchanges, alternative trading systems, clearing and settlement agencies, brokers and similar entities.
- Manage our business:
 - For business development activities, analysis and planning purposes.
 - To investigate and respond to ICG client issues and complaints.

- To establish, exercise, or defend Citi and third party's legal claims, including for breach of contract or of adherence to terms of use.
- For research and other statistical and trend analysis, in each case de-identifying and aggregating or anonymizing sample data so that it is no longer personal data.
- To guarantee our property rights, protect our own safety, the safety of your organization and of third parties, including loss and fraud prevention.
- For our own legitimate interests and those of other financial institutions (provided they are not overridden by your own rights and interests) and to comply with applicable laws:
 - For fraud prevention and other financial criminal activity.
 - For internal risk assessment and controls, by way of example, to detect or resolve cyber incidents or fraud.
 - To comply with judicial requirements, including to exercise our rights in judicial, administrative or arbitration litigation.
 - Some laws will require you to provide us with certain tax information, or complete tax declarations.
 - For regulatory reporting requirements, e.g., financial reporting, Central Bank reporting.

Use and Disclosure Rights

Certain countries and territories require Citi to offer to individuals the options and means to limit their use or disclosure of personal information. Please refer to the appended Special Provisions for your country or territory for information on these additional rights and how to exercise them.

Citi does not sell nor share your Personal information with third parties for their advertising or other commercial purposes. We also do not disclose the Personal Information of persons under the age of 16 (see 'Minors and Children' further below).

Artificial Intelligence, Automated Decision-Making and Profiling

Citi does not delegate decision making or control of operations to automated means (including Artificial Intelligence) and does not conduct profiling that may result in legal effects (including legal effects produced by a contract). Nevertheless, we use artificial intelligence to monitor transaction data to prevent illegal activities, and we use automated processing for risk-calculation and investment analysis or cash management, as an information tool for our personnel. We use fully automated means on securities markets (for example in algorithmic trading) where all information is de-personalised. If Your Organization is our client, depending on your digital marketing choices, we may create user profiles to offer products targeted to Your Organization. Our

marketing communications contain a link to change your preferences or suppress notifications.

5. LAWFUL BASIS OF DATA PROCESSING

The lawful basis that we rely on for data processing vary, depending on the applicable law in the location where we provide our services. These include as the case may be:

- **Consent:** We use consent as a lawful basis, subject to conditions applicable in the country where consent is collected, **only where:**
 - We are required by law to obtain consent or
 - Where consent can be assumed or inferred from your conduct
- **Performance or Delivery of a contract**
 - We will use this lawful basis for processing if:
 - We have a contract with you (or with Your Organization, for your benefit) and we need to process your personal data in order to deliver the products and services referred to in that contract. For example, to set up and manage an account with us, or to process payments.
 - You have asked us to take steps in order to enter into a contract with us or Your Organization. For example, to provide you with a quote or to process your account application.

In countries where we process personal data under consent as legal basis, we will infer it from your continued use of our services, unless we are under a legal obligation to collect positive consent

- **Legitimate interests**
 - We will use this lawful basis for processing if:
 - We have a legitimate business purpose for processing your personal information; and
 - Processing your personal information is necessary to achieve this purpose; and
 - Our legitimate business interest is not overridden by your individual interests, rights and freedoms.
- **Compliance with a legal obligation**
 - We will use this lawful basis for processing if we need to process your personal information to comply with a legal obligation. This may include without limitation:

- Providing information on request to government and regulatory bodies securities and commodities markets, securities brokers, and our intermediaries or counterparties
- Conducting regulatory compliance activities such as: audit and reporting, accounting and tax records, prevention of fraud and other forms of economic crime, complying with international sanctions and anti-terrorism legislation background or KYC verification and screening of politically exposed persons (PEPs)

When we collect and process sensitive personal information, or Special Categories of Information, we will do so by obtaining your explicit consent unless the law allows us to rely on prescribed exceptions:

- If the processing of personal data is clearly needed for your benefit, and your consent for its collection, use or disclosure cannot be obtained in a timely manner, or where you would not be reasonably expected to withhold consent
- If your consent is for a substantial public interest or in the legitimate interest of another person (including us) provided that processing must not extend to what is reasonable to provide a legitimate outcome and the protected interest outweighs any adverse effects of the processing your personal information.

6. YOUR PRIVACY OR DATA PROTECTION RIGHTS

You have rights over your personal information that are protected by law in many countries. Most countries grant 4 basic rights: Access, Rectification, Cancellation and Objection (by their initials, the so-called **ARCO** rights). Citi extends these, and other rights set out in the EU General Data Protection (GDPR), beyond the requirements under local law, in order to provide a consistent standard across our operations globally.

You can [CONTACT US](#) to request any of the following rights:

- Right to be informed
 - You have the to be informed of sub-processors (sub-contractors) that receive your data and a summary of processing purposes and of how we use operational and technical measures to protect your data.
- Right to access your information:
 - You can [contact us](#) to request a copy of the personal information we hold about you. This is often known as a ‘subject access request’.
- Right to rectify your information
 - You can [contact us](#) to ask us to correct personal information that you believe we hold which may be inaccurate or incomplete.

- Right to erase your information (or “right to be forgotten”)
 - You can [contact us](#) to ask us to erase personal information that we hold about you, which we will carry out unless we are required to retain the, for a specific duration, in order to prevent fraud and other forms of crime, or for our defence in claims.
 - There may be some instances where we are not able to erase your personal information if we are under a legal requirement to store product applications or information in relation to banking or securities transactions. If this is the case, we will clearly explain in our reply to your request the reason we are unable to cease processing (and storing) your personal information.
- Right to transfer your information to another organisation
 - You can [contact us](#) to ask us to transfer your personal information to other organisations. This is often known as the ‘right to data portability’.
 - There may be some instances where we are not able to transfer your information, if we are relying on a lawful basis other than ‘consent’ or ‘contract’ to process your personal information.
- Right to restrict processing of your personal information
 - You can [contact us](#) to ask us to restrict processing of your personal information.
 - There may be some instances where we are not able to restrict processing of your personal information if you do not provide us with a particular reason for wanting the restriction.
- Right to object to processing
 - You can [contact us](#) to object to us processing your information.
 - We may not always be able to accept your objection, if we need to continue to process your information for our business, legal and regulatory and other purposes.
- Right to object to the grounds of legitimate interests for processing
 - Where we rely on legitimate interests as the lawful basis for processing your personal information, you can [contact us](#) to object to us processing your information on these grounds.
 - We will always consider your reasons for objecting to us processing personal information on these grounds, and balance your interests, rights, and freedoms with our legitimate business interests
- Right to withdraw your consent for processing your personal information
 - You can [contact us](#) to withdraw your consent for processing your personal information.

- If you withdraw your consent for processing of your personal information and it is necessary for us to conclude a transaction or for legal and regulatory purposes, then we may not be able to provide you with the relevant products and / or services that require such consent.
- There may be situations where we are unable to stop processing your personal information after you withdraw your consent, where it is a legal requirement for us to continue using or storing certain information. If this is the case, we will clearly explain the reason we are unable to stop using (and storing) your personal information.

We may not always be able to provide your requested data or fulfil other rights where certain exceptions apply to a privacy rights request. In our reply, we will explain the rationale for our decision, and the subsequent steps.

We will always respond to your request within the timeframes provided under applicable law.

We will need to verify your identity before we share any details relating to any individual, in order to protect confidentiality. If you are making a request on behalf of someone else (as an attorney or a friend or relative) we may require further information to ensure that you are duly authorised to make the request.

7. DISCLOSURES AND RECIPIENTS OF PERSONAL INFORMATION

In the context of providing each service, we may disclose your personal information to third parties (including our affiliates) confidentially, where necessary, as follows:

- to Your Organization, in connection to the services we provide to them.
- To our affiliates or internal business groups, who may receive or have access to personal information about you if you request or use other services including our online portals and Apps.
- To our service providers who may assist business functions such as application processing, fraud and money laundering monitoring, and the provision of client service centres and web hosting, and data analysis.
- Stock and security trading houses and exchanges, alternative trading systems, clearing and settlement agencies, facilities and similar entities, payment infrastructure providers, counterparty banks, and any persons from whom we receive payments or make payment on your behalf.
- To securities brokers, custodians, sub-custodians, fund administrators, fund houses, depositaries, trustees, financial market infrastructure service providers (including settlement and securities payment providers), and
- To professional services providers: auditors, insurers, legal advisors, and to competent regulatory, tax, governmental or jurisdictional authorities, to central banks and financial regulators and to the courts of any competent jurisdiction, domestic or foreign.

We will only share your information for the purposes outlined in the Section 4 (“**Purposes and Use of Personal Information**”) in this Global Privacy Notice.

Where required by applicable law, we shall add to Country or Territory Supplements, and our client terms and conditions details on third parties we share information with, their locations, and the categories of information that we share.

8. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We provide services to corporations and institutions in more than 95 countries. Your personal information is stored and processed in the country where Your Organization opens a product or we provide a service, and in our regional service centres and networks for operational and regulatory purposes. The Country and Territory Supplements indicate their location.

We and our service providers transfer your personal information to countries and territories that may not provide legal protection that is equivalent to that offered in your place of business or the establishment of Your Organization. For this reason, we take steps to ensure that your personal information receives an optimal level of protection wherever we process it, by using appropriate contractual and technical and operational measures, including (where relevant) standard contractual clauses, complemented with transfer impact assessments (TIA) and specific measures to resolve any issues detected in a TIA.

9. STORAGE AND RETENTION OF PERSONAL INFORMATION

We process personal information only for the length of time that is necessary to carry out the purposes for which personal data was collected and retain your data during such time Your Organization’s accounts and products are open, or a transaction is active, and for a certain time after their closure. Our retention periods vary in accordance with applicable law. When the retention of your personal data is no longer necessary, we will securely dispose of it by destroying the data, or we will irreversibly anonymize it, so that it is no longer personal data. The Country and Territory Supplements indicate the applicable retention terms.

10. SECURITY

Citi stakes reasonable steps to preserve the security of personal information.

All personal information is held in a protected environment with sufficient organizational and technology measures appropriate to a professional financial organization. We have implemented security controls, procedures and protocols across our different business lines, physical premises, and IT networks to minimize loss, misuse, unauthorized access, modification, or disclosure of personal information. All information shared with external third parties is encrypted during transmission and in storage, and all information held internally is protected using security passwords and logons or other security procedures. However, due to the inherent nature of electronic communications, we cannot guarantee the security of personal information outside our networks.

11. MINORS (CHILDREN)

Our products and financial services are intended for corporate, government and institutional clients, and are not designed for persons that cannot enter into business transactions in their own name, including children.

We do not knowingly collect without consent from their parents or guardians, personal information from persons under the age of 16, other than for payment operations. We do not sell, share, or use their data for social media and we do not have targeted advertising directed to children.

We may process personal information relating to minors with prior consent from their parents or guardians, if they are named beneficiaries of trusts, wills or insurance policies, and for similar uses permitted by law. If you have reason to believe that information about a child has been provided to us in error, please contact us.

12. CONTACT INFORMATION

Please use the [Contact Us](#) links provided under Section 6 (“Your Privacy or Data Protection Rights”) to exercise your data subject rights, or refer to the Supplemental Provisions for the location where we provide services.

You may also contact our Data Protection Officers as indicated in the Supplements, including

<p>California Residents</p> <p>If you have any questions about this Supplement, the ways in which Citi collects and processes your Personal Information described in this Supplement, your choices and rights regarding such use, or wish to exercise your rights under the CPRA, please visit Citi California Privacy Hub or call us at 833-981-0270 (TTY: 711)</p>	
<p>EU/EEA Data Protection Officer Citi 1 North Wall Quay Dublin, Ireland D01 T8Y1 Email: dataprotectionofficer@citi.com</p>	<p>UK and EMEA Data Protection Officer Citi 40 Bank Street London E14 5AB United Kingdom Email: dataprotectionofficer@citi.com</p>
<p>Swiss Data Protection Advisor Citi Hardstrasse 201 8005 Zurich Switzerland E: swissdataprotectionadvisor@citi.com</p>	

If you feel that your data has not been handled correctly by Citi, or you are unhappy with our response or have concerns regarding the use of your data, you have the right to lodge a complaint with a data protection authority in the country where the alleged infringement of data protection law occurred.

Contact details for data protection authorities can be found here, and as otherwise indicated in any country or territory-specific supplemental provisions:

EU/EEA: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Switzerland: Federal Data Protection and Information Commissioner (FDPIC): <https://www.edoeb.admin.ch/edoeb/en/home.html>

United Kingdom: Information Commissioner’s Office (ICO): www.ico.org.uk

Jersey: Office of the Information Commissioner: <https://jerseyoic.org>

12. SUPPLEMENTAL PROVISIONS

12.a Supplemental Provisions for Countries and Territories

NORTH AMERICA

CALIFORNIA

- [California Supplemental Provision](#)
- [California Notice at Collection](#)
- [California Privacy Hub](#)

ASIA-PACIFIC

[HONG KONG](#)

[SINGAPORE](#)

LATIN AMERICA

PANAMA (in [English](#)) (en [Español](#))

EUROPE, MIDDLE EAST AND AFRICA

[EUROPEAN ECONOMIC AREA, EUROPEAN UNION, UNITED KINGDOM, SWITZERLAND and OTHER EUROPEAN COUNTRIES.](#)

European Union Countries (EU)				European Economic Area (EEA) (+EU Countries)	OTHER EUROPEAN COUNTRIES WITH SIMILAR OR EQUIVALENT LAWS
Austria	Estonia	Italy	Portugal	Iceland	United Kingdom
Belgium	Finland	Latvia	Romania	Liechtenstein	Jersey
Bulgaria	France	Lithuania	Slovakia	Norway	Guernsey

Croatia	Germany	Luxembourg	Slovenia		Monaco
Cyprus	Greece	Malta	Spain		Isle of Man
Czech Republic	Hungary	Netherlands	Sweden		San Marino
Denmark	Ireland	Poland			The Vatican
					Switzerland

12.b Supplemental Provisions with Information about our Digital Platforms

Please click [here](#) to access our Digital Platforms supplement, which applies to Citi’s online banking and trading portals, and mobile Apps.

12.c Supplemental Provisions for Citi Research

Citi Research activities are covered by a separate document, accessible [here](#)

Section 13 ANNEX
OTHER ICG PRIVACY NOTICES

Treasury and Trade Solutions (TTS) products in Europe and in certain countries are outside the scope of this ICG Global Privacy Notice. You can access Citi's TTS Privacy Statements globally by following this [link](#)

ARGENTINA	https://www.citigroup.com/citi/privacy.html
AUSTRALIA	https://www.citigroup.com/australia/privacy/
AUSTRIA	https://de.citifirst.com/EN/PrivacyStatement
BRAZIL	https://corporateportal.brazil.citibank.com/resources-responsive/pdf/institucional/politica_privacidade.pdf
CANADA	https://www.citigroup.com/canada/en/customer-information/privacy-statement.html
CHINA	https://www.citibank.com.cn/sim/english/pdf/Citi_ClientPrivacyStmnt.pdf
GERMANY	https://de.citifirst.com/EN/PrivacyStatement
HONG KONG	https://www.citibank.com.hk/chinese/info/privacy/?lid=HKENCBGGNFOTLPRIVACY
INDIA	https://www.online.citibank.co.in/privacy/privacy.htm?eOfferCode=INHOGNTFOPRIV
INDONESIA	https://www.citibank.co.id/bahasa/footer/Janji_Privasi_Citigroup.htm?lid=IDBHCBGGNFOTLPrivasi
JAPAN	https://www.citigroup.jp/jp/about/disclosures/cjh-privacy.html
KENYA	https://www.citigroup.com/citi/about/countries-and-jurisdictions/data/branch_privacy_statement_kenya.pdf?ieNocache=238
MALAYSIA	https://www.citibank.com.my/english/docs/privacy-policy.htm?lid=MYENCBGGLFOTLPRIVACY
MEXICO	https://www.banamex.com/es/privacidad_portal.htm
NEW ZEALAND	https://www.citigroup.com/citi/about/countries-and-jurisdictions/new-zealand.html#privacy-statement
NIGERIA	https://www.citigroup.com/citi/about/countries-and-jurisdictions/data/citi-nigeria-data-protection-statement.pdf?ieNocache=908
PHILIPPINES	https://www.citibank.com.ph/gcb/footer/privacy.htm?lid=PHENCBGGNFOTLPRIVACY
RUSSIA	https://www.citibank.ru/russia/main/rus/privacy.htm

SINGAPORE	https://www.citibank.com.sg/gcb/footer/privacy.htm?lid=SGENCBGGNFOTLPRIVACY
SOUTH AFRICA	https://www.citigroup.com/citi/about/countries-and-jurisdictions/south-africa/privacy.html
SOUTH KOREA	https://www.citibank.co.kr/ComStplCnts0101_en.act?MENU_TYPE=left&MENU_C_SEQNO=M5_004239&STP_DS_0_MENU_C_SEQNO=M3_000390
TAIWAN	https://www.citibank.com.tw/global_docs/info/privacy.htm
TURKEY	https://www.citibank.com.tr/aydinlatmametni
UNITED ARAB EMIRATES	https://www.citibank.ae/uae/consumer/info/privacy.htm?icid=AEIFLN42
UGANDA	https://www.citigroup.com/citi/about/countries-and-jurisdictions/data/branch_privacy_statement_uganda.pdf?ieNoCache=876
VIETNAM	https://www.citibank.com.vn/vietnamese/footer/privacy.htm?id=VNENCBGPYFOTLPrivacyPolicy

Treasury and Trade Solutions	https://www.citibank.com/tts/sa/tts-privacy-statements/
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