

Citibank, N.A., QFC Branch - Privacy Notice

Frequently Asked Questions

1. Purpose of this notice

Citibank, N.A., QFC Branch (“Citibank”) provides products and services to corporations, financial institutions, and public sector organisations. This privacy notice explains how Citibank collects and processes personal data about people with whom Citibank comes into contact in the course of its dealings. This includes employees, officers, directors, beneficial owners and other personnel of Citibank’s clients, service providers and other business counterparties (referred to as “you”). Citibank is required to notify you of the information contained in this privacy notice. This notice can be updated at any time and Citibank shall inform you should this occur.

Citibank is responsible for deciding how to hold and use personal information about you and is considered as a controller for the purposes of Regulations No. 6 of 2005, December 2021 (“QFC Data Protection Regulations”). Citibank is a global bank that comprises a number of distinct legal entities. If you are a customer of Citibank (or if you otherwise contract or engage with Citibank in any capacity), your controller for the purposes of this privacy notice will be the Citibank entity with which you contract (or engage). However, there may be instances in which more than one Citibank entity is involved with the processing or collection of your personal data and therefore, may operate as a “joint controller” with one or more other Citibank entities.

It is important that you read this notice, together with any privacy notice that is provided together with any account opening documentation, and other disclosures when Citibank is collecting or processing personal information about you, so that you are aware of how and why Citibank is using such information.

For further details you may contact our Data Protection Officer at amit.dhoot@citi.com

2. The kind of information Citibank holds about you

Citibank collects, stores, and uses the following categories of personal information about your organisation and you:

- contact details for home and/or business such as name, title, addresses, telephone numbers, telefax and email addresses;
- names and titles of owners, directors, shareholders, beneficiaries, counterparties, or similar individuals;
- dates of birth, gender, nationality;
- bank account details and tax status information;
- salary, employment, credit, and other property information;
- specimen signature, copy of passport, Qatar residence visas; and
- other information required for 'know your customer' screening ("KYC") for anti-money laundering laws ("AML") as part of client due diligence or on-boarding process, or other sanctions checking processes which involves the screening of clients and their representatives against published sanctions lists.

3. How is your personal information collected?

Citibank typically collects personal information about customers through the account opening process and/or through the application form and supporting documents collected for the purposes of providing financial services and/or products, either directly or on occasion from third party sales agents (for example, if you have applied for a credit card) or service providers (for example, if we request a credit-check for you). Citibank will sometimes collect additional information from third parties (including from international sanctions lists, publicly available websites, databases and other public data sources). Citibank will also collect additional personal information in the course of your relationship with Citibank.

Citibank does not generally process biometric data. However, from time-to-time, Citibank may process biometric data about you that it collects or receives from your interaction with its systems and applications. You may be able to log into or otherwise interact with Citibank systems and applications by using biometric technology on your eligible mobile device. Such biometric authentication is a digital authentication method that utilises your unique biometric data (e.g., fingerprint or facial characteristics) and the built-in biometric technology on your eligible mobile device. Your biometric data remains on your eligible mobile device and is not transferred to Citibank when this authentication method is used.

4. Legal basis for Processing

Why does Citibank process your personal data?

Citibank processes your personal data, as necessary, to pursue its legitimate interests with regard to the following matters:

- to manage, administer and improve its business and service provider engagements and relationships and for direct marketing, business development and analysis purposes;
- to operate and manage its information technology and systems, and to ensure the security of our information technology and systems;
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce its rights, property or safety, or to assist Citibank or others to do this; and
- to investigate, respond to and address complaints or incidents relating to Citibank or its business, and to maintain service quality and to train its staff.

Citibank also processes your personal data to comply with obligations imposed by applicable laws and regulations. Whilst Citibank sometimes does more than the minimum necessary to comply with those laws and regulations, the same is only as is necessary to pursue its legitimate interests in cooperating with its regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting its businesses and the integrity of the financial markets. This involves processing your personal data for the following reasons:

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies or other intermediaries or counterparties, courts or other third parties;
- to monitor and analyse the use of Citibank's products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and AML prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. This includes KYC screening (which involves identity checks and verifying address and contact details), politically exposed persons 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 on-boarding) and sanctions screening (which involves the screening of clients and their representatives against published sanctions lists); and
- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity. To the extent permitted by law, these recordings are Citibank's sole property.



4. Legal basis for Processing (continued)

In most cases, Citibank does not rely on consent as the legal basis for processing your personal data. If Citibank does rely on your consent, this will be made clear to you at the time Citibank requests for your consent.

In some cases, processing is necessary for the performance of a task carried out in the substantial public interest and or on the basis of an applicable law (e.g., the prevention and detection of crime).

If you do not provide information that Citibank requests, Citibank may not be able to provide (or continue providing) relevant products or services to, or to otherwise do business with you.

Your personal data will be processed in the following situations:

- to perform responsibilities under our contract with you;
- to pursue a legitimate interest in processing your personal data. For example, to communicate with you about changes to our services, and to provide, secure and improve our services;
- to comply with legal obligations imposed on Citibank by applicable laws or regulations; and
- to act on your consent to do so.

When consent is the legal basis for our processing, you may withdraw your consent at any time. However, withdrawing your consent does not affect the lawfulness of processing based on consent before the withdrawal.

5. How Citibank will use information about you

Information contained in the list above enables Citibank to provide banking and/or financial services to you and to enable Citibank to comply with its legal obligations.

Examples of situations in which Citibank will process your personal information are listed below:

- making a decision on whether to provide financial services or products to you;
- send you technical notices, updates, security alerts, and support and administrative messages (such as changes to our terms, conditions and policies) and to respond to your comments, questions, and customer service requests;
- receive and respond to your submissions through electronic means;
- permit you to participate in voluntary polls and surveys (we may use third parties to deliver incentives to you to participate in such polls and surveys, and you may be required to provide your contact details to the third party in order to fulfill the incentive offer);
- communicate with you about products, services, and events offered by us and others, and provide news and information we think will be of interest to you;

5. How Citibank will use information about you (continued)

- monitor and analyse trends, usage, and activities in connection with Citibank's services;
- develop new products and services and enhance current products and services;
- detect, investigate, and prevent fraudulent transactions and other illegal activities, and protect the rights and property of Citibank and others;
- general administration of the contract into which Citibank has entered with you;
- business management and planning, including auditing and accounting;
- dealing with legal disputes involving you, or other banks, financial institutions or contractors;
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Some purposes may overlap and there can be several grounds which justify use of your personal information. If you fail to provide personal information when requested, Citibank will not be able to fully perform the contract with you (for example, paying you or providing a benefit), or Citibank could be prevented from complying with its legal obligations.

Citibank will only use your personal information for the purposes mentioned in this privacy notice, unless Citibank reasonably considers that processing of personal data is needed for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated new purpose, Citibank will notify you and will explain the legal basis which allows us to do so.

Please note that Citibank will process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data sharing

Your personal data may be stored and processed in any country where Citibank has facilities or in which Citibank engages service providers, such as the Kingdom of Bahrain, United Arab Emirates, Poland etc... Certain of these jurisdictions may be recognised by the Data Protection Office at the QFC Authority as providing an adequate level of data protection. Where your personal data is transferred to, stored or processed in any country that is not recognised as providing an adequate level of data protection, such transfers, storage or processing shall be undertaken on the basis of: (a) that the transfer, storage or processing is necessary for the performance of Citibank's contract with you; (b) that the transfer, storage or processing is necessary for the conclusion or performance of a contract that is in your interest; (c) on the basis of your explicit consent; (d) that the transfer is necessary to comply with legal obligations; (e) that the transfer is necessary to protect your or another individual's vital interest; (f) the transfer is necessary to perform a task carried out in the public interest or by the QFC Authority, the QFC Regulatory Authority, the QFC Civil and Commercial Court, the QFC Regulatory Tribunal or a QFC institution in the performance of its functions; and/or (g) the transfer is necessary for the establishment, exercise or defence of a legal claim. As noted above, where any such transfer, storage or processing is undertaken on the basis of your consent, you are entitled to withdraw your consent at any time. However, withdrawing your consent does not affect the lawfulness of processing based on consent granted prior to such withdrawal.

7. Data security

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, Citibank limits access to your personal information to those employees, agents, contractors and other third parties who need to access such data for business purposes. Those persons will only process your personal information on our instructions. Citibank has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where there is a legal obligation to do so.

8. Data retention

How long do we keep your personal data?

Citibank keeps your personal data for as long as is necessary for the purposes for which the personal data was collected, including in connection with maintaining our relationship with you or in connection with performing an agreement with Citibank. Citibank also retains your personal data where necessary for the compliance with a legal or regulatory obligation in accordance with Citibank's records retention policies and procedures. When the retention of your personal data is no longer necessary, Citibank will securely destroy it or will irreversibly anonymise it so that it can no longer be considered personal data.

Citibank will only retain your personal information for as long as necessary to fulfil the purposes for which personal data was collected, including for the purposes of complying with any legal, accounting, or reporting requirements. To determine appropriate retention periods for personal data, Citibank considers the purpose for which it was created, legal and regulatory requirements, and business needs.

In some circumstances, Citibank will anonymise your personal information so that it can no longer be associated with you, in which case Citibank will use such information without further notice to you.

9. Your rights

What are your rights in relation to your personal data?

You may ask us to: (i) provide you with a copy of your personal data; (ii) correct your personal data; (iii) erase your personal data in certain circumstances; or (iv) restrict our processing of your personal data in certain circumstances. You may also object to our processing of your personal data. These rights will be limited in some situations for example, where Citibank is required to process your personal data to comply with a legal or regulatory obligation.

To exercise these rights or if you have questions about how Citibank processes your personal data, please contact us using the contact details in part 10 below.

It is important that the personal information Citibank holds about you is accurate and current. Please inform Citibank if your personal information changes during your working relationship with Citibank.

Under certain circumstances, as provided in the QFC Data Protection Regulations you have the right to:

- **Request access to your personal information.** This enables you to receive a copy of the personal information Citibank holds about you and to check that such personal data is processed lawfully.
- **Request correction of the personal information** that Citibank holds about you. This enables you to have any incomplete or inaccurate information Citibank holds about you corrected.
- **Request erasure of your personal information.** This enables you to ask Citibank to delete or remove personal information where there is no longer a reason for Citibank to hold such data. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see further below).

- **Object to processing of your personal information** where Citibank is relying on a legitimate interest (or those of a third party) or if processing is necessary to perform a task carried out in the public interest. You also have the right to object where Citibank processes your personal information for direct marketing purposes.
- **Request restriction of processing.** This enables you to request Citibank to restrict processing of your personal data.
- **Right to data portability** .You have the right to receive personal data about you that was provided to Citibank, in a structured, commonly used and machine/readable format.
- **Automated individual decision-making.** You have the right to not be subjected to a decision that is based solely on automated processing, including profiling.

In order to exercise one of the rights mentioned above, please contact your relationship manager by telephone or e-mail.

10. Automated decision making (including profiling)

Citibank may uses automated decision making when [•].

Citibank may also make a decisions about you based on the profiling of your information. Profiling is a form of automated processing of your information to evaluate, analyse or predict your economic situation, preferences, reliability, behaviour, location and may be used, for example [•].

11.Data protection officer

Citibank has appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contactAmit.dhoot@citi.com . You have the right to make a complaint at any time to the Data Protection Office at the QFC Authority if you consider that there is an infringement of the QFC Data Protection Regulations.

12. Changes to this privacy notice

Citibank reserves the right to update this privacy notice at any time, and Citibank will provide you with a new privacy notice in case of any substantial updates by providing a copy of the updated policy (or specific changes to this privacy policy, as the case may be) to Citibank's website at <https://www.citibank.com/tts/sa/tts-privacy-statements/> and will also notify you by other means from time to time about the processing of your personal information.



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