

Citi Ethics Office Privacy Statement

Updated July 2024

1. Scope

- 1.1** This Citi Ethics Office Privacy Statement (“Statement”) explains how Citi’s Ethics Office (“we”) may use and otherwise process personal data.
- 1.2** Employees, customers, and third parties may raise or escalate concerns to the Ethics Office when they suspect or become aware of a possible violation of a law, regulation, Citi policy, or the [Citi Code of Conduct](#). The Ethics Office, located in the United States and part of Citibank, N.A., located at 701 East 60th Street North, Sioux Falls, South Dakota, 57104, oversees the handling of such concerns, and is a data controller. All contacts to the Ethics Office and related investigations are treated as confidentially as possible, consistent with the need to investigate and address the matter, and subject to applicable laws and regulations.

2. Personal Data We Collect

- 2.1** The Ethics Office obtains your personal data when you raise a concern to the Ethics Office on a non-anonymous basis (i.e., you voluntarily provide your name or other identifying information about yourself to us when you raise your concern), or if a concern is raised about you by someone else. There are several ways to raise concerns to the Ethics Office, including by web submission and by telephone hotline. The Ethics Office’s web submission portal and telephone hotline are operated by a third-party provider, NAVEX Global, located in the United States. NAVEX Global transfers the personal data it collects on behalf of Citi to the Ethics Office for further handling.
- 2.2** The Ethics Office may also receive your personal data from other Citi entities or functions, as well as third parties, such as Citi’s regulators or suppliers, when that data is related to potential violations of law, regulation, Citi policy, or the Code of Conduct or other concerns raised to the Ethics Office.

3. How We Use Personal Data

- 3.1** The Ethics Office will collect, receive, use, store and otherwise process your personal data in order to carry out the legitimate interests set out in this section in accordance with our Code of Conduct and Mission and Values Proposition, and in order to meet our regulatory requirements.
- 3.2** The Ethics Office collects, receives, uses, stores and otherwise processes personal data for the legitimate interests outlined below where these interests are not overridden by data protection rights and to the extent necessary:

- (a) to investigate and respond to any complaints or concerns raised;

- (b) to administer the Ethics Office's case management system;
- (c) to communicate with individuals and to verify an individual's identity when they contact us or when we contact them;
- (d) where relevant, for the establishment, exercise or defense of legal claims;
- (e) in order to protect and enforce the rights, property or safety of us, our business, Citigroup Inc., Citibank, N.A, or any subsidiaries or affiliates, our stakeholders, our partners or others;
- (f) for information security (including to detect, investigate, monitor, remediate and/or prevent security or cyber incidents), to prevent fraud, and for statistical and trend analysis; and
- (g) for any other purpose that we specifically tell individuals about when we obtain personal data about them.

3.3 The Ethics Office may also use Special Categories of personal data that we receive for the purposes stated in this section. Special Categories of personal data may refer to data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life, sexual orientation or trade union membership, for the purpose of uniquely identifying you.

4. When We Disclose Personal Data

4.1 We (or any third party on our behalf) may need to disclose or transfer personal data to others as follows:

- (a) to any Citi entity (including officers, directors, employees, agents, representatives, and professional advisers) for the purpose of managing our and their relationship with an individual and for the other purposes identified in this Statement related to raising, investigating, and remediating concerns raised to the Ethics Office;
- (b) to legal advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings or others as required in order to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our clients and in order to protect the rights, property or safety of us, our business, Citigroup Inc., Citibank, N.A, or any subsidiaries or affiliates, our clients or others; and
- (c) to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction or markets, domestic or foreign, upon their request or in accordance with or as desirable in respect of any applicable law.

5. Where We Transfer Personal Data

- 5.1** The Ethics Office, our third-party partner which operates the telephone hotline and the web submission page on our behalf (NAVEX Global), and our translation service provider, Eriksen Translations, are located in the United States. Personal data may be transferred to NAVEX Global and Eriksen Translations (or to other relevant third party suppliers where necessary) for the purposes outlined in Section 3 of this Statement. Personal data may also be transferred to other countries for the purposes outlined in Sections 3 and 4, and to the extent allowed by law or regulation.
- 5.2** In relation to transfers of EU employees' personal data, Citi conforms to its Privacy Policy for Transferred European Workforce Data (also known as Citi Workforce "Binding Corporate Rules" (BCR)). This policy has been approved by the European personal information protection authorities. Please refer to the provisions of Citi's BCR for information on how Citi may transfer personal data in compliance with EU law. In relation to transfers of personal data outside the EU of EU individuals who are not employees of Citi, Citi has in place appropriate safeguards, such as standard contractual clauses.

6. How Long We Keep Personal Data

- 6.1** The Ethics Office stores personal data pursuant to Citi's Records Management Policy. We keep personal data for as long as is necessary for the purposes outlined in Section 3 of this Statement or for as long as is required pursuant to applicable legal and/or regulatory requirements, whichever is longer.

7. Security

- 7.1** We implement technical and organizational measures that are appropriate to protect the risk to personal data that we process.

8. Individual's Rights

- 8.1** You can ask us to: (i) provide you with a copy of your personal data; (ii) correct your personal data; (iii) erase your personal data; or (iv) restrict our processing of your personal data. These rights will be limited in some situations; for example, where the legitimate interests in Section 3.2 above require the processing of your data or we are required to process your personal data by EU or EU member state law.
- 8.2** To exercise these rights or if you have questions about how we process your personal data, please contact us using the contact details in this Statement. Individuals in the EEA can also complain to the relevant data protection authorities in the EEA member state where they live or work or where the alleged infringement of data protection law occurred.

9. Changes To This Privacy Statement

9.1 If we modify this Statement at any time we will place the modified versions [here](#) and [here](#). We encourage you to regularly review this Statement to ensure that you are always aware of what personal information we collect and how we use, store and disclose it.

10. Contact

10.1 The Ethics Office can be reached via the Ethics Office's web submission site (use the [Report a Concern](#) button). Please note that calls may result in charges from your carrier. Please check with your carrier before dialing.

10.2 The contact details for other Citi entities who may have access to your personal data can be accessed here: <http://www.citigroup.com/citi/about/countrypresence/>.

10.3 Our Data Protection Officer may be contacted at either of the below:

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| EU/EEA Data Protection Officer Citi 1 North Wall Quay Dublin D01 T8Y1 Ireland Email: dataprotectionofficer@citi.com | UK Data Protection Officer Citi Citigroup Centre 25 Canada Square London E14 5LB United Kingdom Email: dataprotectionofficer@citi.com |
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Supplemental Provision – California

This California Supplemental Provision (the “**Supplement**”) supplements the information contained in the **Citi Ethics Office Privacy Statement**

(the “**Privacy Notice**”) and applies solely to residents of California who have rights under the California Privacy Rights Act (“**CPRA**”) (“**consumers**” or “**you**”). Unless otherwise defined in the Privacy Notice, any terms defined in this Supplement have the meaning used in the CPRA. As used in this Supplement “Citi,” “we” and “us” means Citibank, N.A. and our subsidiaries and affiliated companies.

Sensitive Personal Information

Under the CPRA, certain types of Personal Information are considered “sensitive” Personal Information and require additional data privacy rights and obligations. The Citi Ethics Office (“Ethics Office”) only collects this Sensitive Personal Information if it is provided by you voluntarily or by someone raising a concern about you, or to detect security incidents, to resist malicious, deceptive, fraudulent or illegal activities (“Permitted Uses”) or as otherwise permitted or required by law. Because we use this Sensitive Personal Information of consumers for Permitted Uses, we do not need to provide a Limit Use and Disclosure of Sensitive Personal Information right under the CPRA.

Summary of Personal Information Handling Practices

11. We provide in the chart below a summary of our prior 12-month Personal Information handling practices which is consistent with our practices described in Section 2 (**Personal Data We Collect**

12.), Section 3 (**How We Use Personal Data**

), and Section 4 (**When We Disclose Personal Data**

of the Privacy Notice. We do not have actual knowledge of any collection, use, sale, or sharing of Personal Information of consumers under 16 years of age.

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol | Directly from You, from the organization with which You are associated | <u>Sold</u> We have not sold your identifiers to third parties. <u>Shared</u> |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
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| address, email address, account name, or other similar identifiers. | or represent, from other third parties, from our service providers, and automatically by using our website. | <p>We have not shared your identifiers with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u></p> <p>13. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To administer the Ethics Office’s case management system • To communicate with You and to verify Your identity • To establish, exercise, or defend legal claims • To respond to security-related issues • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws <p>14. For other purposes listed in the How We Use Personal Data</p> <ul style="list-style-type: none"> • section in the Privacy Notice |
| Any Personal Information described in Cal. Civ. Code § 1798.80(e), such as name, | Directly from You, from the organization | <p><u>Sold</u></p> <p>We have not sold such Personal Information to third parties.</p> |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| address, telephone number, account number or financial information | with which You are associated or represent, from other third parties, from our service providers. | <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> 15. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To administer the Ethics Office’s case management system • To communicate with You and to verify Your identity • To establish, exercise, or defend legal claims • To respond to security-related issues • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. <p>16. For other purposes listed in the How We Use Personal Data section in the Privacy Notice</p> |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
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| Characteristics of protected classifications under California or federal law, such as age, gender, racial or ethnic origin, sexual orientation, or marital status | Directly from You, or from other third parties. | <p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> 17. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. <p>18. For other purposes listed in the How We Use Personal Data</p> <ul style="list-style-type: none"> • section in the Privacy Notice |
| Professional or employment-related information | Directly from You, from the organization with which You are associated or represent, or | <p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
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| | from other third parties. | <p><u>Service Providers</u></p> <p>19. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To administer the Ethics Office’s case management system • To communicate with You and to verify Your identity • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws <p>20. For other purposes listed in the How We Use Personal Data</p> <ul style="list-style-type: none"> • section in the Privacy Notice |
| Commercial information, such as records of products or services purchased, obtained, or considered, and other consuming histories or tendencies. | N/A | We do not collect, process, or share such information. |
| Internet or other electronic network activity information, | N/A | We do not collect, process, or share such information. |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
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| including but not limited to browsing history, search history, and information regarding a consumer's interaction with an internet website application | | |
| Sensitive Personal Information, such as information regarding or that may reveal consumers' racial or ethnic origin, religious or philosophical beliefs, union membership, political opinions, health information, sex life, or sexual orientation and consumers' biometric information | We may collect this information directly from You, or from other third parties, however, we do not collect biometric information. | <p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> 21. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. <p>22. For other purposes listed in the How We Use Personal Data section in the Privacy Notice</p> |
| Audio, electronic, visual, or similar information, such as | Directly from You, or from | <u>Sold</u> |

| Category of Personal Information | Sources | Business or commercial purpose of processing and recipients of Personal Information |
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| photographs, audio, and video recordings | other third parties. | <p>We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> 23. We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. <p>24. For other purposes listed in the How We Use Personal Data section in the Privacy Notice</p> |
| Geolocation data, such as your address | N/A | We do not collect, sell, or share such information. |
| Inferences drawn from any of the information identified herein, such as behavior, attitudes, preferences or characteristics derived from consumer interactions | N/A | We do not collect, sell, or share such information. |

Selling or Sharing of Personal Information.

We do not sell your Personal Information or share your Personal Information for cross-context behavioral advertising, and have not done so in the prior 12 months. We also do not knowingly sell or share the Personal Information of children under the age of 16, and have not done so in the prior 12 months.

Retention of Personal Information

We store personal information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Your Rights and Choices

The CPRA affords consumers residing in the California certain rights with respect to their Personal Information, subject to certain exceptions. Subject to certain limitations, you have the following rights in California:

- (1) Right to Delete. You have the right to request us to delete the Personal Information we have collected about you.
- (2) Right to Correct. You have the right to request us to correct inaccurate Personal Information we maintain about you.
- (3) Right to Know and Access. You have the right to know and access the Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- (4) Data Portability. You have the right to receive the information under right (3) in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the Personal Information to a person without impediment, where the processing is carried out by automated means.
- (5) Rights Related to Sharing for Cross-Context Behavioral Advertising or Sale. We do not share your personal information for cross-context behavioral advertising or sell your personal information.
- (6) Right to No Discrimination. You have the right not to be discriminated against for exercising any of your privacy rights. This includes us not: (a) denying you goods or

services; (b) charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (c) providing you a different level or quality of goods or services; and (d) suggesting to you that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your Rights

To exercise your rights described above, please submit a verifiable consumer request to us by either:

- Visiting Citi's California Privacy Hub at <https://online.citi.com/dataprivacyhub>; or
- Calling us at (833) 971-1191 (TTY: 711)

We will need to verify your identity before honoring your privacy right request by asking you to provide Personal Information we may have previously collected about you. Subject to certain limitations, we will honor your privacy rights request within 45 calendar days of receipt of your request, unless we request an extension as permitted by data privacy laws.

Authorized Agents

- You may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please contact us by either:
- Visiting Citi's California Privacy Hub at <https://online.citi.com/dataprivacyhub>; or
- Calling us at (833) 971-1191 (TTY: 711)

Contact Us

If you have any questions about this Supplement or the ways in which the Ethics Office collects and processes your Personal Information described in this Supplement, please contact us via the Ethics Office's web submission site (use the [Report a Concern](#) button). Please note that calls may result in charges from your carrier. Please check with your carrier before dialing.