

**ICG Digital Platforms Supplement: Online Portals and Mobile Apps**

**CitiVelocity, CitiFX Services, CitiDirect, CitiManager and Citi Business**

**Effective Date: 1 January 2023**

These Supplemental Provisions describe how we<sup>1</sup> collect, use and share information you provide when you visit our Digital Platforms.

Digital Platforms mean the Online Portals and Mobile Apps **on this [link](#)** and any Digital Platforms linked to this Digital Platforms supplement.

This “**Digital Platforms Supplement**” complements the Citi ICG Global Privacy Notice. It also applies to any reports, content or data that **Citi ICG** makes available in any format to institutional and corporate clients from our Digital Platforms “**Citi Digital Content**”. In case of conflict, these provisions shall take preference.

We value the trust and confidence you place in us, and earning your trust in how we collect, use, hold and share information about you is our priority.

We advise you to read this **Digital Platforms Supplement** in its entirety, including any jurisdiction-specific links.

As you review this **Digital Platforms Supplement** here are a few important things to keep in mind:

- Our services, sites, pages, or other materials, or those of other Citigroup businesses, have additional terms of use that further limit our use of your personal information. Please review all contractual terms that apply to the specific site or service you are using.

Clients of Citi Private Bank should review their applicable privacy notice(s) at <https://www.privatebank.citibank.com/home/citi-private-bank-privacy-and-security.html> .

- Unless specifically requested by us, please do not provide personal sensitive information, whether about yourself or anyone else, such as information regarding racial or ethnic origin, political, religious or other similar beliefs, health or sex life, trade union membership, criminal record, or criminal offences committed or alleged to have been committed. If we receive such information we will immediately destroy or permanently hash it in a way that cannot be reconstructed.
- As a Citi customer, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives

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<sup>1</sup> The Data Controllers, identified in the first section of this Supplement, are referred to collectively as ‘We’

**CONTENTS OF THIS DIGITAL PLATFORMS SUPPLEMENT**

**PERSONAL INFORMATION WE COLLECT**  
**BUSINESSES AND DATA CONTROLLERS**  
**USING AND SHARING YOUR PERSONAL INFORMATION – CPRA NOTICE ON COLLECTION**  
**ADDITIONAL CPRA DISCLOSURE: SHARING OF PERSONAL INFORMATION**  
**LEGAL BASIS AND PURPOSE OF PROCESSING -GDPR NOTICE**  
**YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION**  
**UPDATING YOUR PERSONAL INFORMATION**  
**SECURITY OF PERSONAL INFORMATION**  
**OTHER IMPORTANT INFORMATION**  
**YOUR PRIVACY RIGHTS - JURISDICTION SPECIFIC INFORMATION**  
    **YOUR CALIFORNIA PRIVACY RIGHTS**  
    **EEA, SWITZERLAND AND UNITED KINGDOM PRIVACY RIGHTS**  
    **OTHER JURISDICTIONS: BRAZIL COLOMBIA UNITED ARAB EMIRATES, SOUTH KOREA**  
**ADDITIONAL INFORMATION**  
    **COOKIES AND SIMILAR TECHNOLOGIES IN OUR DIGITAL PLATFORMS**  
    **DO NOT TRACK**  
    **SECURITY OF PERSONAL INFORMATION**  
    **THIRD PARTY SITES AND SERVICES**  
    **JURISDICTIONAL ISSUES – EXPORTING RESTRICTIONS**  
**CONTACT US**

**PERSONAL INFORMATION WE COLLECT**

We collect two types of information “Personal Information” and “other information”

“Personal Information” is any information:

- 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
- that can be used to authenticate you or provide access to an account.

“Other Information” is information that does not and cannot reveal an individual's specific identity, such as information that has been de-identified or aggregated.

For the past 12 months, we have collected information from the following sources
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Sources	Information Collected
Through the Digital Platform	<p><b>Depending upon the Digital Platform services you request, and subject to limitations in its Terms of Use and your device settings:</b></p> <p>What we Collect: Personal Information such as: account type and status; access credentials, such as a user ID, password, and security questions; the name of your firm, and your department and role at your firm; information about your employment or employment history; biometric information (for authentication, if collected); a record of your acceptance of the Digital Platform’s Terms of Use; and information about your rights of access to the Digital Platform. We may collect additional information for specific purposes, which will be disclosed or evident at the time of collection.</p> <p>We may also collect from you (subject to cookies consents): Internet or other electronic network activity information such as usage and traffic data relating to your access to and use of our Digital Platforms, including pages visited and functions used; and aggregated information about your visits to and use of Digital Platforms. While this information may not directly reveal your individual identity, we may associate this usage and Other Information we collect with Personal Information about you</p> <p>We may also monitor and record your telephone, email, instant messaging, and other communications with us in connection with a Digital Platform.</p> <p>Our business purposes for collecting this information: Providing and administering Digital Platforms; intake of new customers and new users; providing customer service; improving our Digital Platforms and your experience on them; performing research and business analytics, and identifying usage trends; engage in fraud monitoring and prevention; information security; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our and our customers’ legal rights; performing audits; verifying requests made pursuant to this Your Rights; tailoring and sending marketing communications; managing our business effectively; and developing new products and services</p>

ICG Privacy Notice- Digital Platforms Supplement

<p>Through your browser or device</p>	<p>What we collect: Certain information is collected from you automatically through your Internet browser(s) or device(s), to enable secure communications such as your IP address; Media Access Control (MAC) or International Mobile Equipment Identity (IMEI); computer type (Windows or Mac) or device manufacturer and model; optimal screen resolution; operating system name and version; language; Internet browser type, version, and settings; installed fonts; and time zone.</p> <p>We may use attributes associated with your device (such as those described above) in order to create a device fingerprint or identifier so that we can recognize your device, along with the time of your visit and any pages visited.</p> <p>Our business purpose for collecting this information: Providing and administering our Digital Platform(s); intake of new customers and new users; providing customer service (resolving technical issues); improving our Digital Platforms and your experience on them; performing research and business analytics and identifying usage trends; engaging in fraud monitoring and prevention; information security; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our own and our customers’ legal rights; performing audits; verifying requests made pursuant to Your Rights; and subject to your consent: performing sending marketing communications; managing our business effectively; and developing new products and services.</p>
<p>Using unique identifiers such as cookies, pixel tags, device profiling and similar.</p>	<p>What we collect: We may use unique identifiers such as cookies and similar tracking technologies, such as pixel tags and web beacons, to collect device information upon login; browser and browsing information such as time spent on our Digital Platform(s), pages visited, language preferences, and other traffic data. These cookies may contain or reflect segment or other interest-based data in a de-identified form including interests across other sites. We may also collect various attributes associated with your device (such as IP address, installed fonts, language and browser settings, and time zone) in order to create a device fingerprint or identifier so that we can recognize your device.</p> <p>Our business purpose for collecting this information: Providing and administering Digital Platforms; intake of new customers and new users; providing customer services; improving our Digital Platforms and your experience on them; performing research and business analytics, and identifying usage trends; engaging in fraud monitoring and prevention; information security; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our and our customer’s legal rights; understanding your interests and preferences; tailoring and sending marketing communications; managing our business effectively; and developing new products and services.</p>
<p>Drawing inferences from personal information</p>	<p>What we develop: We may draw inferences from the Personal Information about you and from information about your firm that we have collected.</p> <p>Our business purpose for drawing these inferences: Using these inferences for our internal business and operational purposes, including to provide customer service and support; develop and improve our products and services; perform research and business analytics; and to tailor marketing communications from us and our affiliates</p>

<p>From third parties</p>	<p>What we collect: We may collect information about you from third-party sources, including, for example, your firm or employer, financial institutions, government sources, and other individuals. This information may include name and contact information, credit and background reports, and information from government records.</p> <p>Our business purpose for collecting this information: Providing and administering Digital Platforms; intake of new customers and new users of; engaging in fraud monitoring and prevention; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our customers’ legal rights; performing audits; and managing our business effectively.</p>
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**CALIFORNIA NOTICE**

**Summary of 12-Month Personal Information Handling Practices for ICG Digital Platforms**

**Citi ICG provides in the chart below a summary of our prior 12-month Personal Information handling practices in our Digital Platforms. 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
<p>Identifiers, such as real name, email address, postal address, or other similar identifiers</p>	<p>You (through your use of a Digital Platform)</p> <p>Your Organization (the institutional or corporate client you are affiliated with)</p>	<p><b>Sold</b> We have not sold your identifiers to third parties.</p> <p><b>Shared</b> We have not shared your identifiers with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> 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 our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Any Personal Information described in Cal. Civ. Code § 1798.80(e), such as name, address, telephone number, or financial information</p> <p>Depending upon the services you request, we may collect additional Personal Information such as: account type and status access credentials, such as a user ID, password, and security questions</p>	<p>You (through your use of a Digital Platform)</p> <p>Your Organization (the institutional or corporate client you are affiliated with)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>

ICG Privacy Notice- Digital Platforms Supplement

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
<p>Characteristics of protected classifications under California or federal law, such as age, gender, or marital status</p>	<p>You (through your use of a Digital Platform)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Commercial information, such as records of products or services purchased, obtained, or considered, and a record of your acceptance of the Digital Platform’s Terms of Use (for example CitiVelocity <a href="#">terms</a>).</p>	<p>You (through your use of a Digital Platform)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Internet or other electronic network activity information, such as browsing history, such as usage and traffic data relating to your access to and use of a Digital Platform, including pages visited and functions used; information collected through cookies, web beacons and similar Technologies (subject to your consent and privacy settings); and aggregated information about your visits to and use of a Digital Platform. While this information may not directly reveal your identity, we may associate this usage and Other Information we collect with Personal Information about you.</p> <p>We may also monitor and record your telephone, email, instant messaging, voice and other communications with or in</p>	<p>You (including through your use of a Digital Platform)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
connection with your activities in our Digital Platforms		
Sensitive Personal Information, such as consumers' biometric information (for authentication and information security, if collected*)	You (through your use of a Digital Platform)	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the "Disclosure of Personal Information" section in the Privacy Notice for more details.</p>
Professional or employment-related information, including the name of your firm, your department and role at your firm; and information about your employment or employment history;	<p>You (through your use of a Digital Platform)</p> <p>Your Organization (the institutional or corporate client you are affiliated with)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the "Disclosure of Personal Information" section in the Privacy Notice for more details.</p>
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99))	You (through your use of a Digital Platform)	We have not sold, shared or used such Personal Information.

**OTHER DISCLOSURE OF PERSONAL INFORMATION**

We may disclose Personal Information to the entities and for the circumstances indicated here :

- Citi affiliates or other internal divisions or lines of business, which may receive or have access to Personal Information about you if you access, request, or otherwise use other Citigroup services in connection with your use of Digital Services you have selected, and as permissible under applicable law.
- Citi affiliates' service providers, who may provide services such as website hosting, data analysis, information technology and related infrastructure provision, and customer service, or otherwise assist in the management and execution of business functions.
- Regulatory agencies, alternative trading systems, clearing and settlement agencies, brokers, and similar entities.

- Third parties in connection with a proposed or completed business transaction, including any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or a portion of our businesses or assets, or in connection with any bankruptcy or similar proceedings; and
- Your Organization or its affiliates.
- The corporate entity you are associated with, to manage disputes or issues with access to Citi Digital Content and to help that corporate entity value and pay for the Citi Digital Content.
- To the other data controllers of Citi Digital Platforms named in this Supplement, to manage business and resources and to improve our Citi Digital Content and its applicability to you.
- To stock exchanges, alternative trading systems, clearing and settlement agencies, brokers, and other financial institutions with whom Digital Platforms share information and for fraud and other crime-prevention purposes.
- To service providers that are our approved third party distributors to enable your access of Citi Digital Content.
- To legal advisors, government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings.
- To competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction.
- To other persons where disclosure is required by law or to enable Citi Digital Content to be provided to you or our clients;
- To prospective buyers as part of a sale, merger or other disposal of any of our business or assets.

We have not disclosed or shared Personal Information with third parties for advertising purposes

**LEGAL BASIS AND PURPOSES OF PROCESSING – GDPR NOTICE**

\*We process your personal information for the following reasons:

<b>Legal Base</b>	<b>Purposes</b>
(a) Where the processing is necessary for us to perform a contract with you or for requested pre-contract steps (GDPR Art 6.1.b)	<ul style="list-style-type: none"> <li>- Providing and administering our Digital Platforms, including the intake of new clients and users</li> <li>- Communicate with you, including to provide you and your firm with updates, provide customer services, send you technical notices, security alerts, and support and administrative messages (such as changes to or terms and conditions, and policies) and respond to your comments, questions and customer service requests.</li> <li>- Providing financial products and services to our clients and to communicate with you and/or our clients about them;</li> </ul>

	<ul style="list-style-type: none"> <li>- For pre-contract steps prior to entering into a contract with us, including customer and third party due diligence;</li> <li>- When Your Organization furnishes instructions in relation to any contract or transaction, including to make a paymentm</li> </ul>
<p>(b) Where we are required EU or EEA Member State law, UK or Swiss law or the law of any applicable jurisdiction (GDPR Art 6.1.c)</p>	<ul style="list-style-type: none"> <li>- For compliance with EEA, UK Swiss and other countries laws and obligations by the data controller or its sub-processors, without notice to you, or as required for your relevant Digital Platform services to be provided.</li> <li>- complying with Applicable Law, including without limitation anti-money laundering and anti-terrorist laws and regulations (including without limitation the U.K. Proceeds of Crime Act 2002, the U.K. Terrorism Act 2000, the U.K. Terrorism Act 2006 and the U.K. Money Laundering Regulations 2007) and fighting crime</li> <li>- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third parties;</li> <li>- We sometimes do more than the minimum necessary for compliance with those laws and regulations, but only as necessary to pursue our legitimate interests in cooperating with our regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets</li> <li>- 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 and anti-terrorism laws and regulations and fighting crime. This includes know your customer (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' (PEPs) 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);</li> </ul>
<p>c) 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. We will perform a balancing test of the interests prior to relying on legitimate interest to process personal data. (GDPR Art 6.1.f)</p>	<ul style="list-style-type: none"> <li>- improving our digital platforms and your experience on them;</li> <li>- performing research and business analytics, identifying usage trends to monitor and improve our own business, and to generate reports or other content based on research and analysis, utilizing Other Information that does not identify individuals;</li> <li>- engaging in fraud monitoring and prevention;</li> <li>- for information security;</li> <li>- protecting our business and our customers against illegal activity;</li> <li>- protecting our and our customers' legal rights;</li> <li>- performing audits;</li> </ul>

	<ul style="list-style-type: none"><li>- verifying requests made pursuant to this Privacy Notice;</li><li>- tailoring and sending marketing communications and events offered by Citi and others and provide news and information relevant to the products and services contracted by Your Organization: please note that you can change your privacy settings and object to marketing communications at any time;</li><li>- managing our business effectively;</li><li>- developing new products and services.</li><li>• Manage our businesses, including the use of Personal Information in conjunction with service providers who assist in the management and execution of business functions;</li><li>• managing the relationship between you, Your Organization and any Citigroup Affiliate;</li><li>• meeting obligations to stock exchanges, alternative trading systems, clearing and settlement agencies, government agencies and regulatory authorities, brokers, and other similar entities;</li><li>• assigning, sub-contracting, outsourcing or procuring goods or services for any part of the normal business functions of any Citigroup Affiliate to third parties. A list of Citigroup affiliates can be accessed here: <a href="https://www.citigroup.com/citi/about/countries-and-jurisdictions/">https://www.citigroup.com/citi/about/countries-and-jurisdictions/</a></li><li>• monitoring our Digital Platform services monitoring Citigroup Global Markets' services, whether conducted by Citigroup Global Markets, any other Citigroup Affiliate or a third party;</li><li>• communicating with credit reference and information agencies</li><li>• to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;</li><li>- to monitor and analyze the use of our products and services for system administration, operation, testing and support purposes;</li><li>-to manage our information technology and to ensure the security of our systems;</li><li>- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this;</li><li>- to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes;</li><li>- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);</li></ul>
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	<p>- 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; and/or</p> <p>- to disclose information to governmental, tax or regulatory bodies, financial markets, brokers or other intermediaries, counterparties, court, auditors or other third parties, including third parties that assist us in complying with our regulatory or legal requirements or conduct compliance activities, when this is relevant to a transaction or activity regulated by applicable law other than EU/EEA, Swiss, UK or Crown Dependency law and such disclosure in in our (or a third party's) legitimate interest</p>
<p>d) Consent (GDPR Art 6.1.a)</p>	<p>In most cases, we do not rely on consent as the legal basis for processing your personal data. If we do rely on your consent, we will make this clear to you at the time we collect your data and ask for your consent. We rely on your consent to deploy and manage Cookies and other tracking technologies on devices from which you access our Digital Platforms.</p> <p>You may withdraw or revoke your consent, and change your cookie and tracker preferences at any time, but if you do so, we may be unable to provide (or continue providing) relevant products, or services that are subject to such consent to, or to otherwise do business with, you or Your Organization.</p>
<p>f) Substantial Public Interest (GDPR Art 6.1.e)</p>	<p>In exceptional cases, our legal basis is that processing is necessary for the performance of a task carried out in a substantial public interest. This interest must be expressly recognized in statutory law (e.g, in Schedule 2 to the UK Data Protection Act 2018: prevention and detection of crime or the protection of vulnerable persons).</p>

**YOUR PRIVACY RIGHTS- JURISDICTION SPECIFIC INFORMATION**

**A. Your US and California Privacy Rights**

If you are a US or California resident, please refer to the Global Privacy Notice and its California Supplement

For information regarding how to exercise your rights as a consumer under the California **Privacy Rights Act (CPRA)**, please see **Supplemental Provisions for California Residents**[<LINK>]

**B. Your EEA and United Kingdom Privacy Rights**

If you are located in the EEA and the United Kingdom or in another jurisdiction subject to European data protection laws, you have certain rights. Please refer to the EEA (and UK) Supplemental Provisions in our global Privacy Notice

**C. Other jurisdictions**

To exercise your privacy and other rights in other jurisdictions, users of Digital Content should contact us using the forms and information found on the following sites:

**Singapore:** [https://www.citibank.com.sg/global\\_docs/pdf/FINAL\\_CSL\\_PDPA\\_Circular\\_Corporates.pdf](https://www.citibank.com.sg/global_docs/pdf/FINAL_CSL_PDPA_Circular_Corporates.pdf)

**Hong Kong:** [https://www.citibank.com.hk/english/info/pdf/PDPO\\_EN.pdf](https://www.citibank.com.hk/english/info/pdf/PDPO_EN.pdf)

**India:** <https://www.online.citibank.co.in/privacy/privacy.htm>

**Mexico:** [https://www.banamex.com/es/privacidad\\_portal.htm](https://www.banamex.com/es/privacidad_portal.htm)

**Brazil:** [https://corporateportal.brazil.citibank.com/resources-responsive/pdf/institucional/politica\\_privacidade.pdf](https://corporateportal.brazil.citibank.com/resources-responsive/pdf/institucional/politica_privacidade.pdf) ;

**Colombia:** [https://www.citibank.com/icg/sa/latam/colombia/institucional-info/assets/docs/Aviso\\_de\\_Privacidad\\_Citibank\\_2019.pdf](https://www.citibank.com/icg/sa/latam/colombia/institucional-info/assets/docs/Aviso_de_Privacidad_Citibank_2019.pdf)

**United Arab Emirates: (Note)** use of the Digital Platforms signifies that you agree to waive your material privacy rights under the laws of the UAE. Your use of the Services indicates your consent to disclose any information that you may consider a secret to anybody at any time. You agree not to hold Citi liable for any disclosure of such information that you may think to be a secret to anyone. Please do not use Digital Services if you disagree with any part of this Supplement.

**South Korea:** Your consent of the Privacy Notice, this Supplement and the User Agreement indicates your agreement that your personal information will be controlled, not by Citibank Korea Inc. nor other subsidiaries and affiliates in Korea ("Citi Korea"), but by Citigroup Inc. New York, United States of America or its affiliated entity which operates the Services you are accessing. Citi Korea is solely responsible for the use of your personal information within Korea, when it is used by Citi Korea, under the applicable Korean laws including; Personal Information Protection Act, Act on Promotion of Information and Communications Network Utilization and Information Protection, and other relevant Korean laws. Your personal information and any Submitted materials can be shared with Citi Korea, but Citi Korea will not collect and use such personal information and material for any marketing purpose without your prior consent. When Citi Korea obtains personal information our personal information via the Digital Services, its use will be controlled by and be bound to the necessary process and procedure following the applicable Korean laws.

## **ADDITIONAL INFORMATION**

### **MOBILE PUSH NOTIFICATIONS**

With your consent, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

### **LOCATION INFORMATION**

When you first launch our mobile application, you will be given the option to consent to the app's collection of precise location information. If you initially consent to our collection of such location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. You may also stop our collection of this location information by following the standard uninstall process to remove all of our mobile apps from your device. If you stop our collection of this location information, some features of our Services may no longer function properly.

### **COOKIES AND SIMILAR TECHNOLOGIES IN OUR DIGITAL PLATFORMS**

Cookies are small data files that are stored on your device by a website you visit.

#### Essential Cookies

We use cookies that are essential for authentication purposes and to allow you access to Digital Content. We also collect traffic information about electronic devices that access our digital platforms including technical data that is considered personal information in the US, EEA and the United Kingdom, including your device's IP, MAC and IMEI addresses. We do this for security reasons and to identify your device and comply with your cookies choices.

#### Functional and Analytics Cookies

If we deploy functional and analytical cookies we will display a 'cookie banner' and ask for your consent to use them. Functional cookies improve your experience of our Digital Platforms (for example by remembering your preferences and access credentials across different pages and functions). Analytical cookies measure how often you visit and which parts of the Digital Content you access or visit and your use of any of the functions included within our platforms .

**Analytics cookies** may include Adobe Omniture and Adobe Analytics. We may also use products from Google Analytics and Google Marketing Platform Analytics. **Adobe and Google are US electronic communications service providers that are subject to the CLOUD Act (USC 2523) and Foreign Intelligence Surveillance Act (50 USC 36 S. 1801). These two statutes contain provisions that allow federal law enforcement and intelligence agencies to request non-US browsing and technical data, under certain conditions.**

You can choose whether to accept or not cookies or trackers through your browser settings. For example, most browsers allow you to automatically decline cookies or decline or accept a particular cookie (or cookies) from a particular site when browsing. If you decide not to accept cookies, certain features of our Digital Platforms may not work properly because we may not be able to recognize your device and associate you with your Citi account(s). In addition, the content we provide may not be as relevant to you or tailored to your interests.

Local shared objects may be stored on your device when using a media player or other software integrated into our Digital Platforms. Local shared objects are similar to cookies in terms of their operation, but they are not managed in your browser in the same way. Restricting acceptance of local shared objects may impede the functionality of some features, including how certain content is presented. Similarly, certain authentication features of our apps may set a persistent token, similar to a cookie, on your mobile device. This token allows that device to be uniquely associated or bound with your account. This token will remain on your device until you un-enroll from those features or delete the app from your device.

### **DO NOT TRACK**

Some browsers have a do not track feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not respond to browser do not track signals.

#### **SECURITY OF PERSONAL INFORMATION**

The security of financial and personal information is our priority. We protect this information by maintaining physical, electronic and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive

#### **THIRD-PARTY SITES AND SERVICES**

This Notice does not address, and we are not responsible for, the privacy, security, or other practices of any third parties, including any third party operating any site or service linked to from our Digital Platforms. The inclusion of a link to any third-party site or service does not imply endorsement of the linked site or service by us or by our affiliates.

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### **CONTACT US**

If you have any questions about **Citi Velocity** please contact us by email at [CitiVelocityPrivacy@citi.com](mailto:CitiVelocityPrivacy@citi.com).

If you would like to submit a request pursuant your **GDPR rights** please contact:

EU/EEA Data Protection Officer  
Citi  
1 North Wall Quay,  
Dublin D01 T8Y1  
Ireland  
Email: [dataprotectionofficer@citi.com](mailto:dataprotectionofficer@citi.com)

UK Data Protection Officer  
Citigroup Centre 2- Floor 9  
25 Canada Square  
London, E14 5LB  
United Kingdom  
Email: [dataprotectionofficer@citi.com](mailto:dataprotectionofficer@citi.com)

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