

SUPPLEMENTAL EEA (and UK) PROVISIONS

Effective Date: **11 November 2022**.

Scope and Applicability

This EEA and UK Document **supplements and replaces** the Global Privacy Notice for ICG businesses in the EEA and UK.

CONTENTS

1. Who is Responsible for your Personal Information?
2. Sources of Personal Information We Collect
3. Types of Personal Information We Collect and Process
4. Purposes and Use of Personal Information
5. Lawful Basis
6. Your Privacy Rights
7. Disclosure of Personal Information
8. Transfers of Personal Information
9. Retention of Personal Information
10. Children
11. Contact Us
12. Annex: EEA / UK Data Controllers

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION?

The ICG legal entity which provides the accounts, products and services you are using or accessing on behalf of Your Organization, is responsible for determining what Personal Information will be collected, the purposes it will be collected for, and how it will be processed. That entity is the Data Controller.

The Citi entities listed in the Annex to this Supplement are the data controllers of your personal data in the EEA/UK.

A complete list of Citi global entities is available on:

<https://www.citigroup.com/citi/about/countries-and-jurisdictions/>

2. SOURCES OF PERSONAL INFORMATION WE COLLECT

Where does Citi obtain Personal Information about you?

We process personal information that you provide to us directly, and information that we learn from our communications and other dealings with you and/or Your Organisation. We may also obtain some personal information about you from the public domain.

From Your Organization

This information may include your name, company, title, date of birth and job description, contact details such as your business email address, physical address and telephone number and other information required for legal or regulatory purposes including our KYC, AML and/or sanctions and investor screening processes (e.g., copies of your passport or a specimen of your signature) and for transaction management purposes

From other organizations and counterparties

We may obtain information in the course of a financial operation, but please note, if Your Organization is a ‘target’ of an investment, acquisition or divestiture, we are precluded from notifying you of our data processing or from engaging in any other activity that would disclose information that may influence the price of shares or any other security, before it becomes publicly available information.

Public and private research sources

We obtain personal information from public domain and subscription-based sources both inside and outside your country of residence. Data we obtain may include your name, company, title and job description and business contact details, and your holdings of shares, participations and investments in Your Organization, our clients or any other entity, and international economic sanctions lists.

3. TYPES OF INFORMATION WE COLLECT AND PROCESS

Personal Information

ICG collects and processes personal information about you, for the purposes indicated in this EEA/UK Supplement.

Types of personal information we process, include:

- Your identity: name, company, title, job description and position in Your Organization.
- Your business contact details such as email address, telephone number, business address,
- Information about your employment and signature authorisations issued by Your Organization, and your current and prior relationships within Your Organization.
- Information about your relationship with us, preferred methods of services communications, and your marketing preferences
- Information relating to your personal assets as part of our Know Your Client (KYC) legal and regulatory obligations, including background and credit checks, and identifying the ultimate beneficial ownership structure of Your Organization and a corporate entity you are associated with.
- Information relating to your financial and personal background and residential address as part of any reference and identity verification checks, and to open and maintain accounts, products, and services on behalf of the corporate or institutional entity you represent.
- Information required for other legal or regulatory purposes including our KYC, AML and/or sanctions and investor screening processes (e.g., copies of your passport or a specimen of your signature) or for transaction management purposes
- Other details of agreements or arrangements Your Organization made with us.

Where required by law, we will process sensitive or otherwise protected information. We have systems that compartmentalize such information, and have operational, technical and governance measures in place, including strict access controls, to protect the confidentiality and security of our data.

Sensitive Personal Information

We will only collect and process personal information which is necessary to provide our products and services and as required for legal and regulatory purposes. We will always provide you with additional explanatory information and disclosures if we collect or otherwise process sensitive personal information, such as biometric and behavioural data that we learn from your interactions with our systems and applications, for example your mouse speed and movements, your keyboard usage, voice authentication using telephone banking and by using the built-in biometric authentication technology in your mobile device. When we use device authentication, we will not have access to your biometric data, which remains stored in your mobile device.

“Special categories of personal information”

[Please note: Our ICG businesses do not intentionally collect Special Categories of Information]

Under the EU and UK GDPR, special categories of personal information include racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person’s sexual orientation. Financial account information is not considered a special category of personal information under EEA and UK laws.

The GDPR places restrictions on the processing of special categories of personal data, and of data relating to a criminal offence, the allegation of a criminal offence, and its investigation.

When we collect and process sensitive personal information, we will usually do so by obtaining your explicit consent, and will not rely on implied consent. There are exceptions where we will not rely on consent, for example where:

- It is necessary for reasons of a substantial public interest established by applicable law;
- It is necessary for the establishment, exercise or defence of legal claims;
- The data being processed has been manifestly made public by you; or

In order to prevent its accidental processing, please do not include in any communications with us any Sensitive Personal Information about yourself or anyone else. If we receive Sensitive Personal Information by accident or happenstance, we will let you know and immediately take measures to dispose of it.

Digital Personal Information

Information for Citi ICG public Websites *
(*for online banking and financial sites and Apps please refer to our Digital Platforms Supplement)

Device and Usage Information: We collect technical information from your browser on how you access our digital pages, including data about the device and network you use, such as your hardware model, operating system version, mobile network, browser type, app version and unique online identifiers such as your IP address, IMEI and MAC addresses. Subject to your cookie choices, we also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.

Cookies and Similar Tracking Technologies: We collect information about our digital services through technologies such as cookies web beacons and trackers. This includes information such as:

- Information about your use of the services and about the device you use to access the services
- The pages you request and visit and any posts you submit
- Information on your interaction with other pages
- Information obtained in the course of maintaining or supporting the Services

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

- Provide essential security and safety protections (Essential Cookies)
- Provide personalised functions based on location, activity and online identifiers (Functional Cookies)
- Analyse your interests, count visits, the effectiveness of our campaigns and see which areas and features of our Services are popular (Analytics Cookies).

We may provide our own, and third party, functional and analytics cookies. These two forms are subject to your consent. Please refer to each sites has page-specific Cookie Notices and options.

4. PURPOSES AND USE OF PERSONAL INFORMATION AND LEGAL BASIS

Why do we process your personal information?

We process your personal information for the following reasons:

Legal Basis	Purposes and Use
(a) Where the processing is necessary for us to perform a contract with you or for requested pre-contract steps	<ul style="list-style-type: none"> - to provide banking and financial products and services to Your Organization and to communicate with you and/or our clients about them; - For pre-contract steps prior to entering into a contract with us, including customer and third party due diligence; - When Your Organization furnishes instructions in relation to any contract or transaction, including to make a payment;
(b) Where we are required EU or EEA Member State law, UK or Swiss law or the law of any applicable jurisdiction	<ul style="list-style-type: none"> - 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; <p>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</p> <ul style="list-style-type: none"> -to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax

	<p>records, fraud and anti-money laundering (AML), prevention of terrorism and white-collar crime, complying with country, regional and UN international sanctions, conducting checks on politically exposed persons: all of which involve screening a person’s name and national ID against sanction and crime enforcement lists and registers.</p>
<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 information.</p>	<ul style="list-style-type: none"> - to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes; - to monitor and analyse the use of our products and services for system administration, operation, testing and support purposes; -to operate and manage our information technology and to ensure the security of our systems; - 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; - 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; - to monitor and analyse the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud); - 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 - 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>d) Consent</p>	<p>In most cases, we do not rely on consent as the legal basis for processing your personal information. 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.</p> <p>You may withdraw or revoke your consent at any time, but if you do so, we may be unable to provide any services that require your</p>

	consent by law (for example providing your data to merchants and payment service providers) and we may not be able to continue providing cross-border transactions to you or Your Organization where countries outside the EEA and the UK require your consent.
f) Substantial Public Interest	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 recognised in statutory law (eg, Schedule 2 to the UK Data Protection Act 2018: prevention and detection of crime or the protection of vulnerable persons).

Direct Marketing Use

ICG will not use, sell or share your personal information with third parties for direct marketing purposes. Subject to your communication settings, we will agree to a form of sending you service messages, and subject to your electronic device settings and consents, we may provide you with information about other corporate products that may be of interest to Your Organization. You can opt out of, or object to receiving marketing communications.

Use and Disclosure Rights

ICG does not sell or share your Personal information with third parties for their commercial purposes. We also do not knowingly sell, share, or use your personal information for third party targeted advertising, nor disclose the Personal Information of persons under the age of 16 (see under 'Children' further below).

Automated Decision Making and Profiling

ICG does not make any automated decisions based on personal information or sensitive personal information, and we do not conduct profiling for commercial purposes, based on your personal information or sensitive personal information. You should be aware that we automatically monitor transaction data in commercial bank and card activities for fraud and Anti-Money Laundering purposes. All decisions involving personal information are conducted by or checked by our staff. Where we process data automatically (for example in algorithmic investment strategies) all information is de-personalised.

5. YOUR PRIVACY RIGHTS

Your rights over your personal information are protected by applicable law in many countries. Most countries grant 4 basic rights: Access, Rectification, Cancellation and Objection. Citi ICG extends these and other GDPR rights to ICG clients for global operations:

- Right to be informed
 - You have the to be informed of sub-processors that receive your data and of certain operational and technical measures we put in place 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
 - You can [contact us](#) to ask us to erase personal information that we hold about you
 - There may be some instances where we are not able to erase your personal information. For example, where it is a legal requirement for us to continue to process your information. If this is the case, we will clearly explain the reason we are unable to stop processing 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. For example, 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. For example, 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. For example, if we need to continue to process your information for our business, legal and regulatory 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 process that information for one of our business, legal and

regulatory and other purposes, then we may not be able to provide you with the relevant products and / or services

- There may be situations where we are unable to stop processing your personal information, for example, where it is a legal requirement for us to continue using the information. If this is the case, we will clearly explain the reason we are unable to stop using (and storing) your personal information.

These rights are limited in some cases: for example, we may not be able to provide information where we are required by law to withhold any information until a transaction or corporate action is disclosed to the public, or where we process your personal information for Anti-Money Laundering, fraud and sanction screening activities; and we will not be able to erase or delete data for a certain period after a transaction or investment are closed.

We will always respond to requests within the timeframes provided under applicable law. We will need to verify your identity before we share any details relating to personal information. If you are making a request on behalf of someone else (e.g., as an attorney or a friend or relative) we may require further information to ensure that you are authorised to act for them. When we respond to your request, we will explain clearly whether we can fulfil your request, the rationale for our decision, and what will happen next.

If you have unanswered questions, please contact our Data Protection Officers at the addresses at end of this document.

If you feel that your personal information has not been handled correctly, or you are unhappy with our Data Protection Officer's response regarding the use of your personal information, you have the right to lodge a complaint with a lead data protection authority in the UK or in EU/EEA member state where you reside or where the alleged infringement of data protection law occurred.

Contact details for data protection authorities can be found here:

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>

6. DISCLOSURE OF PERSONAL INFORMATION

To whom does Citi Disclose Personal information?

We may disclose your personal information, for the reasons set out in the Section above, as follows:

- to Your Organisation in connection with the products and services that we provide to it if Your Organisation is our client, or otherwise in connection with our dealings with Your Organisation;

- to other Citi entities (this includes the entities referenced at <http://www.citigroup.com/citi/about/countries-and-jurisdictions/>) for the purpose of managing your or Your Organisation's relationships;
- to third parties that form part of a payment system infrastructure of which otherwise facilitate payments; intermediary, agent and correspondent banks, digital or eWallets, similar entities other persons from whom we receive, or to whom we make, payments on Your Organisation's behalf;
- to export credit agencies, multilateral agencies, development finance institutions, other financial institutions, governmental authorities and their agents, insurers, due diligence service providers and credit assessors, in each case in connection with the products and services that we provide to Your Organization if Your Organization is our client, including in connection with financing;
- to central clearing banks, infrastructures and organizations with whom we exchange securities and payments on our clients' behalf, in each case to service your or Your Organisation's account;
- to service providers that provide application processing, fraud monitoring, call centre and/or other client services, hosting services and other technology and business process outsourcing services;
- to our professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);
- 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 or market, domestic or foreign;
- to other persons where disclosure is required by law or regulation or to enable products and services to be provided to you, Your Organisation; and
- to prospective buyers as part of a sale, merger or other disposal of any of or business of assets

7. TRANSFERS OF PERSONAL INFORMATION FROM THE EEA AND THE UK

Where do we transfer your personal information ?

We may transfer your personal information to Citi entities, regulatory, prosecuting, tax and governmental authorities, courts and other tribunals, service providers and other business counterparties located in countries outside the European Economic Area (EEA) or UK, including countries which have different data protection standards to those which apply in the EEA or UK. This includes transfers of personal information to **India, Singapore** and the **United States of America** (for the Markets business, transfers may also include **Malaysia**) . **When we transfer your personal information to Citi entities, service providers or other business counterparties in these countries outside the EEA and UK and whose data protection laws are not deemed to provide an adequate level of protection, we will ensure that they protect your personal information in accordance with**

EEA and UK-approved standard data transfer agreements or other appropriate safeguards in accordance with EU and UK data protection laws.

Your personal information is stored and processed in the country where our institutional or corporate client's account, product or service is opened; and in our regional main offices or 'global service clusters' for operational, regulatory and management reasons explained in this Privacy Notice (for example, to perform AML checks in that other country).

Citi ICG and its service providers may transfer your personal information to, or store or access it in, countries and territories that may not provide levels of data protection that are the same or equivalent to those of your location. We will take steps to ensure that your personal information receives an adequate level of protection wherever which we process it, through lawful data transfer mechanisms, including Standard Contractual Clauses to countries that do not have recognised Adequacy in their standards. We will inform you of the transfer of data and obtain consent if required by applicable law.

8. RETENTION OF PERSONAL INFORMATION

We do not retain personal information for longer than is necessary to carry out the purposes for which personal information was collected, including in connection with maintaining our relationship with You or your Organization or in connection with performing an agreement with a client or Your Organization. We keep that data during such time your (or Your Organization's) accounts and products are active, and for a certain time after their closure where necessary to comply with a legal or regulatory obligation and in accordance with our records retention policies and procedures. When the retention of your personal information is no longer necessary, we will securely destroy it or we will irreversibly anonymize it so that it is no longer personal information.

9. CHILDREN

This Privacy Notice is not intended for or directed at persons under the age of 18. In addition, Citi ICG Services are not designed for children and we do not knowingly collect personal information from children under the age of 16. We also do not knowingly sell, share, use for information society services or targeted advertising personal information of children. We may process information relating to minors with consent from their parents or guardians, where they are named beneficiaries of trusts, wills or insurance policies, and similar uses permitted by law. If you have reason to believe that a child has provided personal information to us, please [contact us](#), and we will take appropriate action.

10. CONTACT US

REQUESTS FOR DATA RIGHTS

To exercise Your Privacy Rights please [contact us](#)

You may also reach out to our EEA and UK Data Protection Officers:

EU/EEA Data Protection Officer

Citi, 1 North Wall Quay
Dublin D01 T8Y1
Ireland

ICG Global Privacy Notice
EEA and UK SUPPLEMENT

Email: dataprotectionofficer@citi.com

UK Data Protection Officer

Citi, Citigroup Centre

25 Canada Square

London E14 5LB

United Kingdom

Email: dataprotectionofficer@citi.com

ANNEX
EEA /UK DATA CONTROLLERS

CITI COMMERCIAL BANK

The relevant data controllers of your personal information in relation to Citi's Commercial bank businesses are one or more of the following entities:

Head Office

Citibank Europe plc
1 North Wall Quay
Dublin, 1
Ireland

Branches

Citibank Europe plc, Belgium Branch
Citibank Europe plc, organizacni slozka
Citibank Europe plc, Finland Branch
Citibank Europe plc, Greece Branch
Citibank Europe plc, Austria Branch
Citibank Europe plc, Bulgaria Branch
Citibank Europe plc, Denmark Branch
Citibank Europe plc, France Branch
Citibank Europe plc, Netherlands Branch
Citibank Europe plc, Norway Branch
Citibank Europe plc, Italy Branch
Citibank Europe plc, Dublin - Romania Branch
Citibank Europe plc, pobočka zahraničnej banky
Citibank Europe plc, Sucursal en España
Citibank Europe plc, Sucursal em Portugal
Citibank Europe plc, Sweden Branch
Citibank Europe plc, Hungarian Branch Office
Citibank Europe plc, Germany branch

Citibank, N.A., London Branch
Citigroup Centre
Canada Square, Canary Wharf
London E14 5LB
United Kingdom

Bank Handlowy w Warszawie S.A.
ul. Senatorska 16
00-923 Warsaw
Poland

TREASURY AND TRADE SOLUTIONS- CASH AND TRADE BUSINESSES

The Citi entities listed below are the controllers of your personal information:

1. Citibank Europe Plc, 1 North Wall Quay, Dublin, D01 T8Y1, IR
2. Citibank Europe plc, UK Branch, Citigroup Centre, 25 Canada Square, Canary Wharf, London E14 5LB, UK
3. Citibank N.A., London Branch, Citibank Centre, 25 Canada Square, London, E14 5LB, UK

4. Citibank Europe Plc, France Branch, 1-5 Rue Paul Cezanne, Paris, 75008, FR
5. Citibank Europe Plc German Branch, Reuterweg 16, Frankfurt, 60323, DE
6. Citibank N.A. Milan, Viale Brenta 27/29, Milan, 20139, IT
7. Citibank Europe Plc Netherlands Branch, 257 Schiphol Boulevard WTC D Tower, Amsterdam, 1118, NL
8. Citibank Europe Plc, Austria Branch, Kärntner Ring 11-13/7/2/3, Vienna, 1010, AT
9. Citibank Europe Plc, Belgium Branch, Boulevard Louis Schmidtlaan 29, Brussels, 1040, BE
10. Citibank Europe Plc, Denmark Branch, Vesterbrogade 1 L 5tv, Copenhagen, 1620, DK
11. Citibank Europe Plc, Finland Branch, Aleksanterinkatu 48 A, Helsinki, 100, FI
12. Citibank Europe Plc, Greece Branch, 8 Othonos Street, Athens, 105 57, GR
13. Citibank Europe Plc, Portugal Branch, 4 Rua Barata Salgueiro 30, 4th Floor, Lisbon, 1269-056, PT
14. Citibank Europe Plc, Sweden Branch, Birger Jarlsgatan 6, Stockholm, 111 84, SE
15. Citibank Europe Plc, Spain Branch, Calle Jose Ortega y Gasset 29 Planta 4, Madrid, 28006, ES
16. Citibank Europe Plc, Norway Branch, Bolette Brygge 1, Oslo, 252, NO
17. Citibank Europe Plc, Luxembourg Branch, 31 Z A Bourmicht, Bertrange, L-8070, LU
18. Citibank, N.A. Jersey Branch, 38 Esplanade, St Helier, JE4 8QB, JE
19. Citibank Europe Plc, Dublin — sucursala Romania, Calea Victoriei Nr 145, Sector 1, Bucharest, 010072, RO
20. Citibank Europe Plc, pobočka zahraničnej banky, Dvorakovo Nabrezie 8, Bratislava, 811 02, SK
21. Citibank Europe Plc, Hungarian Branch Office, Citibank Tower Bank Center, Szabadság tér 7. Budapest, 1051, HU
22. Citibank Europe Plc, Bulgaria Branch, Serdika Offices, 10th floor, 48 Sitnyakovo Boulevard, Sofia, 1505, BG
23. Citibank Europe Plc, Organizacni Slozka, Bucharova 2641 14, Prague, 158 02, CZ
24. Bank Handlowy w Warszawie S.A., 16 Senatorska Street, Warsaw, 00-923, PL

BANKING, CAPITAL MARKETS AND ADVISORY

The relevant data controllers of your personal information in relation to Citi's Banking, Capital Markets and Advisory businesses and Citi's Issuer Services businesses are as follows.

Banking, Capital Markets and Advisory businesses: one or more of the following entities:

Head Office	Branches
Citibank Europe plc 1 North Wall Quay Dublin, 1 Ireland	Citibank Europe plc, Belgium Branch Citibank Europe plc, organizacni slozka Citibank Europe plc, Finland Branch Citibank Europe plc, Greece Branch Citibank Europe plc, Austria Branch Citibank Europe plc, Bulgaria Branch Citibank Europe plc, Denmark Branch Citibank Europe plc, France Branch Citibank Europe plc, Netherlands Branch Citibank Europe plc, Norway Branch Citibank Europe plc, Italy Branch Citibank Europe plc, Dublin - Romania Branch Citibank Europe plc, pobočka zahraničnej banky Citibank Europe plc, Sucursal en España Citibank Europe plc, Sucursal em Portugal Citibank Europe plc, Sweden Branch Citibank Europe plc, Hungarian Branch Office
Citigroup Global Markets Limited Citigroup Centre Canada Square, Canary Wharf London E14 5LB United Kingdom	
Citibank, N.A., London Branch Citigroup Centre Canada Square, Canary Wharf London E14 5LB United Kingdom	
Bank Handlowy w Warszawie S.A. ul. Senatorska 16 00-923 Warsaw Poland	
Citibank, N.A., Milan Branch Via dei Mercanti, 12 20121 Milan Italy	
Citigroup Global Markets Europe AG 5th Floor Reuterweg 16 60323 Frankfurt Germany	
Bank Handlowy w Warszawie S.A. ul. Senatorska 16	

00-923 Warsaw
Poland

Citigroup España SA
José Ortega y Gasset, 29
28006 Madrid
Spain

Dom Maklerski Banku Handlowego S.A.
ul. Senatorska 16
Warsaw, 00-923
Poland

ISSUER SERVICES:

Head Office

Citibank, N.A., London Branch
Citigroup Centre
Canada Square, Canary Wharf
London E14 5LB
United Kingdom

Citigroup Global Markets Europe AG
5th Floor Reuterweg 16
60323 Frankfurt, Germany

Citicorp Trustee Company Limited
Citigroup Centre
Canada Square, Canary Wharf
London E14 5LB, United Kingdom

MARKETS AND SECURITIES SERVICES

Markets business: One or more of the following entities, depending on the nature of the relevant services provided under our Terms of Business with our clients:

- Citigroup Global Markets Limited (its registered office is at Citigroup Centre, Canada Square, London E14 5LB),
- Citibank, N.A., London Branch (registered as a branch of Citibank, N.A. with registered address in the UK at Citigroup Centre, Canada Square, London E14 5LB),
- Citibank Europe plc, UK Branch (registered in England as a branch of Citibank Europe plc with registered address at 1 North Wall Quay, Dublin 1, Ireland, DO1 T8Y1 and in the UK at Citigroup Centre, Canada Square, London E14 5LB),
- Citibank Europe plc, Romania Branch 145 Calea Victoriei, 1st District, 010072, Bucharest
- Citibank Europe plc Hungarian Branch Office Magyarországi Fióktelepe, 1051 Budapest, Szabadság tér 7. Bank Center
- Citibank Europe plc organizacni slozka Bucharova 2641/14, 158 02, Praha 5

- Citibank Europe plc Hungarian Branch Office 1051 Budapest, Szabadság tér 7
- Citigroup Global Markets Europe AG, Reuterweg 16, 60323 Frankfurt, Germany, and/or
- Citibank Europe plc, Germany Branch, Reuterweg 16, 60323 Frankfurt, Germany

unless otherwise specified in the Terms of Business with our clients, in which case, you should refer to those Terms of Business for our identity and contact details.

Direct custody and clearing business:

- Citibank Europe plc, 1 North Wall Quay, Dublin, 1, Ireland
- Citibank Europe plc, Bulgaria Branch, Serdika Offices, 10th floor, 48 Sitnyakovo Blvd., Sofia 1505, Bulgaria
- Citibank Europe plc, organizacni slozka, Bucharova 2641/14, 158 02 Prague 5, Stodůlky, Czech Republic acting on

behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland

- Citibank Europe plc, Greece Branch, Othonos 8, Athens, 10557, Greece
- Citibank Europe plc, Hungarian Branch Office, Bank Center, Citibank Tower, Szabadság tér 7, H-1052, Budapest, Hungary on behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland
- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank Europe plc, Dublin – Romania Branch, Calea Victoriei 145 Sector 1, Bucharest, Romania
- Citibank Europe plc, pobočka zahraničnej banky, Dvořákovo nábrežie 8, 811 02 Bratislava, Slovak Republic acting on behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland
- Citibank Europe plc, Sweden Branch, Box 1422, SE 111 84 Stockholm, Sweden
- National City Nominees Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- N.C.B. Trust Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Vidacos Nominees, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Citibank London Nominees Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB

Global custody business: The relevant data controllers of your personal information are:

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank Europe plc, Luxembourg Branch, 31, Bourmicht, 8070 Bertrange, Grand Duchy of Luxembourg
- Citifriends Nominee Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Nominees (Ireland) Designated Activity Company, 1 North Wall Quay, Dublin 1
- CUIM Nominee Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citiclient Nominees No 8 Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB

- N.C.B. Trust Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Vidacos Nominees, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB

Global fund services (including fund administration (fund accounting), middle office, fiduciary/depositary services and passive currency overlay services); tax-related, reporting and ancillary services (including VAT-related services) business:

- Citibank Europe plc, 1 North Wall Quay, Dublin, 1, Ireland
- Citi Depositary Services Ireland Designated Activity Company, 1 North Wall Quay, Dublin, 1, Ireland
- Capital Residential Fund Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Capital Residential Fund Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Property (AIPF) Nominee No 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square,
Canary Wharf, London E14 5LB
- CIP Property (AIPF) Nominee No 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Property (AIPF) Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI GREF Nominee 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI GREF Nominee 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI UKPF Nominee No 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI UKPF Nominee No 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Threadneedle UK Property Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Threadneedle UK Property Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CitiClient (CPF) Nominees Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CitiClient (CPF) Nominees No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CTCL (BUKP) Fund Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB

- CTCL (BUKP) Fund Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Europe plc, Greece Branch, Othonos 8, Athens, 10557, Greece
- Citibank Europe plc, Hungarian Branch Office, Bank Center, Citibank Tower, Szabadság tér 7, H-1052, Budapest, Hungary
- Citibank Europe plc, Netherlands Branch, Schiphol Boulevard 257, WTC D Tower, PO Box 75567, 1118 Schiphol, The Netherlands
- Citibank Europe plc, Luxembourg Branch, 31, Z.A.BOURMICHT , Bertrange LU L-8070
- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank Europe plc, Sweden Branch, Box 1422, Sergelgatan 1, SE-111 84 Stockholm, Sweden

Agency securities lending and directed agent investment services business:

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom

Collateral management services business:

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom

CITI PRIVATE BANK, COUNTRY-LEVEL PRIVACY STATEMENTS

For on-shored (domestic) operations in the following countries

	https://www.privatebank.citibank.com/privacy
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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=INHOGN TFOPRIV
INDONESIA	https://www.citibank.co.id/bahasa/footer/Janji_Privasi_Citigroup.htm?lid=ID BHCBBGGNFOTLPrivasi
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=PHENCBGGNFOTLP_RIVACY
RUSSIA	https://www.citibank.ru/russia/main/rus/privacy.htm
SINGAPORE	https://www.citibank.com.sg/gcb/footer/privacy.htm?lid=SGENCBGGNFOTLP_RIVACY
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 SQNO=M5_004239&STP_DS_0 MENU_C SQNO=M3_000390
TAIWAN	https://www.citibank.com.tw/global_docs/info/privacy.htm
TURKEY	https://www.citibank.com.tr/aydinlatmametni
UAE	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
UNITED STATES	https://online.citi.com/US/JRS/portal/template.do?ID=Privacy
VIETNAM	https://www.citibank.com.vn/vietnamese/footer/privacy.htm?lid=VNENCBGP_YFOTLPrivacyPolicy