



# Privacy Statement

## Citi Trust - International

This Privacy Statement explains how Citi Trust and each Related Party process personal data and includes information about your data protection rights, including the right to object to some processing.

“**Personal data**” means any information relating to a natural person who can be identified, directly or indirectly, by name, an identification number, location, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

“**Processing of personal data**” means any operation or set of operations, which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure (by transmission, dissemination or otherwise making available), alignment, combination, restriction, erasure or destruction.

“**Citi Trust**” means the applicable Citi Trust International companies listed in Section 2.1 below. These organizations are also known as Data Controllers under certain privacy laws.

“**Related Party**” means each parent, subsidiary, affiliated or associated company of Citi Trust (and any director, officer, or employee of any such company of Citi Trust) including Citigroup.

“**Citigroup**” means Citigroup Inc., Citibank, N.A., Citigroup Global Markets Inc. and their branches, subsidiaries and affiliates.

Any defined terms in the Citi Trust *Terms and Conditions* have the same meaning in this Privacy Statement.

This Privacy Statement takes effect on 1 September 2023.

## 1. When does this Privacy Statement apply to you?

This Privacy Statement applies to each Citi Trust:

- Client
- Prospective Client
- “**Interest Holder**”, which means each settlor, power holder, authorized third party, beneficiary, beneficial owner, and direct or indirect owner of a Trust, PIC, or corporate Client.

## 2. How can you contact Citi Trust?

2.1 Citi Trust’s contact details are:

- **Cititrust (Bahamas) Limited**  
Caves Corporate Center No.2  
West Bay Street  
P.O. Box N-1576  
Nassau  
The Bahamas
- **Cititrust (Jersey) Limited**
- **Citigroup (Channel Islands) Limited**  
P.O. Box 728  
38 Esplanade  
St. Helier  
Jersey JE4 8ZT  
Channel Islands
- **Cititrust (Cayman) Limited**
- **Cititrust Private Trust (Cayman) Limited**  
Queensgate House  
South Church Street  
P.O. Box 1170-G  
Grand Cayman KY1-1102  
Cayman Islands, BWI
- **Cititrust (Singapore) Limited**  
8 Marina View  
Asia Square Tower 1  
Singapore 01896

- **Citicorp Trust Delaware, N.A**  
(where another Citi Trust International company is its agent)  
20 Montchanin Road, Suite 180  
Greenville, Delaware 19807  
USA

- **Cititrust (Switzerland) Limited**
- **Cititrust Private Trust Zurich GmbH**  
Prime Tower  
Hardstrasse  
P.O. Box 20  
CH-8010 Zurich  
Switzerland

- 2.2 Citi Trust shall exchange personal data with Related Parties whose contact details can be found in Annex A to this privacy statement.
- 2.3 If you have any questions or requests in relation to your personal data, please contact your Citi Trust trust officer or, when applicable, the Data Protection Officer/ Advisor as set out below. We are happy to discuss other methods of contacting us if you have difficulty with email or post.

Jersey and UK	Singapore	Switzerland
Jersey and UK Data Protection Officer 25 Canada Square London E14 5LB United Kingdom Email: dataprotectionofficer@citi.com	Singapore Data Protection Officer 8 Marina View #21-01 Asia Square Tower One Singapore 018960	Swiss Data Protection Advisor Hardstrasse 201 8005 Zurich Switzerland Email: swissdataprotectionadvisor@citi.com
EU/EEA		
EU/EEA Data Protection Officer 1 North Wall Quay Dublin D01 T8Y1 Ireland Email: dataprotectionofficer@citi.com		

### 3. Why does Citi Trust process your personal data?

Citi Trust and each Related Party process your personal data for the following reasons. If you do not provide personal data, then Citi Trust may be unable to provide you with Services and may need to terminate any contractual or fiduciary relationship with you.

*Where the processing is necessary for Citi Trust to perform a contract with you or for requested pre-contract steps.*

- 3.1 TSA.** For performance of the Trustee Services Agreement. For example,
- To set up and service a relationship and to carry out Client directions, including exchange of data with a Private Banker.
  - To set up and to maintain a Trust or PIC.
  - To attend to legal requirements imposed on a trust or PIC.
  - To take pre-contract measures you request to assess your needs in relation to specific products or services.

*Where required by Jersey law, Swiss law, EU law, or UK law (Jersey, Switzerland, the EU, and the UK being the “Relevant Jurisdictions”) or the law of an applicable jurisdiction.*

- 3.2 EU Regulators and Others.** To disclose information to governmental entities or regulatory authorities, financial markets, banks, brokers or other intermediaries or counterparties, courts or other parties. For example, EU banks require Citi Trust to exchange Client personal data to comply with anti-money laundering, sanctions, and tax laws.
- 3.3 Publication by Government.** To comply with laws that require a government to make some personal data available for public inspection, such as persons with significant

control of Scottish partnerships and beneficial owners of PICs that own or pledge UK real estate.

- 3.4 Regulatory Compliance.** 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, anti-terrorism laws and regulations and fighting financial crime. This includes:
- (a) Know your customer (**KYC**) screening, which involves identity checks and verifying address and contact details.
  - (b) Politically exposed person (**PEP**) screening, which involves checking Client and Interest Holder records against internal and external databases to establish any connections to a PEP.
  - (c) Sanctions screening, which involves checking Client and Interest Holder records against published sanctions lists.
- 3.5 AML Reporting.** For AML and transaction reporting purposes or any other reporting required by our regulators.
- 3.6 Securities Regulation.** To disclose Client and Interest Holder information in order to comply with any shareholder identification and disclosure request received from any company.
- 3.7 Tax Compliance.** For tax purposes.
- 3.8 Security and Data Breach Remediation.** To investigate and correct any security incidents and data protection breaches in any Citigroup information system.

*Where necessary for Citi Trust's, a Related Party's, or a third party's legitimate interests (as listed here).*

- 3.9 To Perform Services.**
- (a) To provide fiduciary services to you, such as performance of a trust instrument, PIC articles and memorandum of association, and contracts among Citi Trust, PICs, Related Parties, banks and others.
  - (b) To arrange through Related Parties and others financial services for a trust or PIC. To communicate with you and Interest Holders about these services.
  - (c) Citi Trust and Related Parties may process beneficiary personal data to be able to contact, identify, and distribute the trust fund to these beneficiaries after the Client's life, without informing these beneficiaries during the Client's life.
- 3.10 To Account.** To exchange personal data with a Citigroup wealth planner, trust relationship manager, trust officer, Citi Trust manager, or Private Banker in order to review relationship details with a Client or beneficiary to whom Citi Trust owes a duty to account.
- 3.11 To Manage.** To manage and administer Citigroup's business, to manage and improve relationships with you, to assist with client management, and for marketing and business development activities and analysis.
- 3.12 To Inform.** To inform you about Citi Trust and Citigroup products or services or any products and services of Citigroup, subject to your contact preference options and rights to object to marketing communications.
- 3.13 To Authenticate.** To record telephone conversations with you, to retain your picture, record video footage (subject to separate video recording notices as may be applicable), and to keep samples of your signature or handwriting.
- 3.14 To Monitor.** To monitor and analyze the use of Citi Trust services, for risk assessment and control, for statistical and trend analysis, for compliance with policies and system administration, operation, testing and support, and to operate control and management information systems.
- 3.15 To Maintain.** Under directions or at the request of a Client or Interest Holder, or when Citi Trust or a Related Party may exercise discretion under a Trust, PIC, or contract, to establish and maintain a relationship with a financial institution, law firm, advisor, family officer, security issuer, company or any other person in the Citi Trust relationship.
- 3.16 To Police.** To help detect, prevent, investigate, and prosecute fraud and other criminal activity, and share this data with Citigroup legal, compliance, risk, tax, AML, Citi Security and Investigative Services and managerial staff to assess suspicious activities.

- 3.17 To Secure.** To manage Citi Trust information technology and to ensure the security and dependability of Citi Trust and Related Party systems
- 3.18 To Comply.**
- (a) To disclose information to, and comply with instructions of, relevant governmental, tax or regulatory bodies, financial markets, brokers or other intermediaries, counterparties, courts, auditors and other third parties, such as law firms, and accounting firms, who assist Citi Trust in complying with regulatory and legal requirements.
  - (b) To conduct compliance activities, in Citi Trust's, or any Related Party's or PIC's interests, in connection with any transaction or relationship anywhere in the world (including where no Relevant Jurisdiction requires us to make disclosure or conduct these activities, and whether or not subject to the jurisdiction of the party requesting disclosure), and to make such disclosures, even to the detriment of the Client or Interest Holder.
  - (c) To meet a regulatory obligation in a country outside the Relevant Jurisdictions.
  - (d) To disclose information to other Related Parties or third parties, including those outside the Relevant Jurisdictions in order to assist with compliance with regulatory requirements.
- 3.19 To Determine Rights and Duties.** To determine Citi Trust and Related Party legal rights and duties, and to prepare documentation such as trust amendments and tax returns.
- 3.20 To Defend.** To establish, exercise or defend legal claims and in order to protect and enforce Citi Trust's, a PIC's, and Related Party's rights, property, or safety, or to assist a Client or others to do this.
- 3.21 To Apply to Court.** To make applications for protective orders or directions to courts supervising Citi Trust as Trustee or to establish, exercise or defend legal claims and in order to protect and enforce Citi Trust and Related Party's rights, property, or safety, or to assist Clients or others to do this.
- 3.22 To Investigate.** To investigate and respond to any complaints about Citi Trust or Citigroup business or any incidents relating to Citi Trust or Citigroup business and to help maintain service quality and train staff, to deal with complaints and disputes
- 3.23 To Improve and Remediate.** To engage in projects that assess, correct and improve operations and systems to better meet fiduciary, regulatory, and service objectives.
- 3.24 To Manage Risk.** 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, anti-terrorism laws and regulations and fighting crime. This includes KYC, PEP, negative media, and sanctions screening; exchange of source of wealth data, passports and identification documents with an account carrier to open and maintain a bank account; engagement of data aggregation firms to help monitor bank account transactions; and provision of personal data to any Citigroup trust company to open and maintain a fiduciary relationship, as part of client due diligence and onboarding
- 3.25 To Report.** For transaction and tax reporting to Citigroup regulators anywhere in the world
- 3.26 To Follow Laws.** For compliance with duties under any Tax Act and applicable laws, including trust law, company law, and securities law in any jurisdiction.

*Where you consent to the processing of personal data*

- 3.27 To Market.** For direct marketing from Citigroup, subject to your marketing preferences.
- 3.28 To Process a Child's Data.** To the extent required to allow Citi Trust and Related Parties to process personal data of a minor.
- 3.29 To Process Health information:** To the extent required to allow Citi Trust and Related Parties to process personal data about the health of a Client or Interest Holder.
- 3.30 To Process Political Affiliation and Criminal Data.** To carry out compliance activities using information about political affiliations as well as criminal convictions, allegations of offences and sanctions.

- 3.31 To Process Religious Belief information.** To the extent required to allow Citi Trust and Related Parties to process personal data about religious beliefs, for example beliefs that lead to trust provisions that prohibit interest-bearing investments.
- 3.32 To Comply with Applicable Law.** To the extent that consent for the processing of personal data may be required under applicable law.
- 3.33 To Confirm Lawfulness of Processing.** Citi Trust may ask you to agree that you have received this Privacy Statement and that you agree to each and every individual data processing activity and reasons set out in this Privacy Statement.

You can withdraw or revoke your consent at any time. The withdrawal of consent shall not affect the lawfulness of prior processing or processing for other reasons and based on other grounds where this is permitted under applicable law.

*Where necessary to protect your or an Interest Holder's vital interests.*

- 3.34 To Protect Beneficiaries.** Where necessary to protect an interest which is essential for the life of a Client or Interest Holder such as to invest, administer, and distribute assets according to a Trust instrument for the care of a Client suffering disability, or for a minor or disabled beneficiary.

#### 4. Where does Citi Trust obtain data about you?

- 4.1 From You.** Citi Trust and each Related Party process information that you provide directly and information learned about you from our communications and dealings with you, such as data and cookies collected from your interactions with Citigroup websites and InView (subject to cookie choices), information about Citigroup publications and products you interact with in third party platforms and your responses when sent emails and other communications (subject to your marketing contact preferences). We also obtain some information about you from other sources, as set out below.
- 4.2 From Clients.** A Client or prospective Client is the usual source of information on Interest Holders. The individual or prospective Client or Interest Holder may be based inside or outside your country or the EU. Processed information may include the Client's or Interest Holder's name, company, title and job description and contact details (such as email address, telephone numbers, home address, and business address), citizenship, passport, identification information, details of family relationships, banking relationships, financial and tax status, business and other affairs, and interests in a trust or PIC.
- 4.3 From Public Sources.** Sources both inside and outside the EU, such as news outlets, websites and other media sources, international sanctions lists, any publicly available databases or data sources. Processed information may include your name, company, title and job description and contact details (such as email address, telephone numbers, home address, and business address), citizenship, passport, identification information, details about Client and Interest Holder personal or business interests or activities.
- 4.4 From Other Sources.** Any research agencies who may carry out research on Citigroup's behalf, perform background checks upon our instruction or may offer research subscription services both inside and outside your country and the Relevant Jurisdictions. The data we may obtain could include any of the data listed in this section.

#### 5. To whom does Citi Trust disclose your personal data?

Citi Trust and Related Parties may disclose your personal data to others as follows.

- 5.1 To Other Citi Trusts and Related Parties.** To any Citi Trust or Related Party for the purpose of managing Citi Trust's and their relationship with you and other purposes identified in this Privacy Statement.
- 5.2 To Management.** To monitor business activity, risk, and client service.

- 5.3 **To Special Asset Management Unit.** In case special assets are held or proffered, such as non-financial assets or client managed companies, and in case a PIC conducts a relevant activity under economic substance laws, Citi Trust and Citigroup may process and exchange personal data with Citigroup special asset management unit.
- 5.4 **To Investment Officers.** In case Citi Trust has investment discretion under a trust instrument or other relationship, Citi Trust and Citigroup may process and exchange personal data with the responsible Citigroup investment officer.
- 5.5 **To Control Staff.** For compliance with laws, risk criteria, procedures, and policies, Citi Trust and Citigroup may process and exchange personal data with the responsible Citigroup chief trust officer, investments and fiduciary risk officer, compliance officer, business risk officer, legal officer, tax officer, anti-money laundering officer, fraud officer, audit officer, data protection officer, control officer, Citi Trust leadership team, and Citi Trust managers.
- 5.6 **To Operations and Technology Staff.** For special projects to maintain fiduciary and service standards and to maintain Citi Trust and Related Party systems, Citi Trust and Citigroup may process and exchange personal data with operations and technology production management staff and specialists.
- 5.7 **To Other Service Providers.** At the request of any counterparty bank, payment infrastructure provider, custodian, sub-custodian, fund houses, fund administrators or issuers of securities (including their affiliates), or other third party, engaged in relation to any payment or investment or credit facility or business process and to service an account and investment as per the provisions of any specific product or service agreement relevant to such investment or service.
- 5.8 **To Legal and Tax Advisors.** With management and counsel, in order to establish, exercise, defend, or protect legal rights, obligations, and claims, including in relation to trusts, PICs, contracts, threatened or filed litigation, and in order to protect the rights, property, or safety of Citi Trust, PICs, any Related Party, their clients or others. This includes exchange with legal, tax or other professional advisors, government and law enforcement authorities, and with other parties involved in, or contemplating, a transaction, structure, or legal proceedings.
- 5.9 **To Global Authorities.** To any competent regulatory, prosecuting, tax, or governmental authorities, and to courts or other tribunals in any jurisdiction, such as the following.
  - (a) **Financial Regulators.** For review by trust company, bank or other examiners.
  - (b) **Tax Authorities.** For Tax Act reporting in tax systems and to tax agents.
  - (c) **Beneficial Owner Registers.** For public and non-public registers of beneficial owners.
  - (d) **Economic Substance Portals.** For PICs to comply with economic substance laws.
  - (e) **AML and Sanctions Authorities.** In case of a money laundering, sanctions, or criminal investigation, Citi Trust and any Related Party may cooperate with authorities and process and disclose personal data to any government, judicial body, or regulatory body of which a Citigroup entity is a member or is subject to that body's jurisdiction or rules.
  - (f) **Court Officers.** Pursuant to subpoena or other legal process.
  - (g) **Agencies.** At the express direction of any other authorized government agency.
  - (h) **Lawyers and Auditors.** To Citi Trust and Related Party internal or external attorneys or auditors.
  - (i) **Enforcers.** To others to whom Citi Trust or a Related Party are required to make such disclosure by applicable law, whether or not compulsory under the jurisdiction of Citi Trust, PIC, or the Related Party who discloses.
- 5.10 **To Successors.** To third parties in connection with a change of trusteeship, change of PIC ownership or management, or change of ownership of any assets.

## 6. Where does Citi Trust transfer your personal data?

Citi Trust and Citigroup seek to provide the Client and beneficiaries efficient global service, so Citi Trust, Related Party, or PIC perform, or authorize a Citigroup or external contractors to perform, data processing, including but not limited to the following locations.

- 6.1 **To Client Contact Staff.** Where the Client's or Interest Holder's Private Banker, wealth planner, trust relationship manager, trust officer, and Citi Trust manager are located, such as in The

Bahamas, Jersey, Singapore, Hong Kong, Switzerland, Spain, United Arab Emirates, United Kingdom, or the United States.

- 6.2 **To Citi Trusts.** Where Citi Trust and Citi Trust-managed Related Parties are located in The Bahamas, Cayman Islands, Jersey, Singapore, Switzerland, United Kingdom, and/or the United States.
- 6.3 **To New Business Unit.** Where new Citi Trust relationships and upgrades are processed. For example, Citi Trust and Citigroup may exchange personal data with the Cititrust (Bahamas) Limited international new business unit.
- 6.4 **To PIC Registered Offices.** Where the PIC has its registered office in its country of incorporation or tax residence.
- 6.5 **To Account Carriers.** Where a Citi Trust's, or PIC's account carriers or assets are located, and where such account carriers or asset managers perform data processing as allowed by account opening or other documentation or local law.
- 6.6 **To Citigroup and External Databases.** Where Citi Trust and Related Parties maintain central and backup database facilities, for reconciliation of accounts, and for reduction of technology risks. For example:
- (a) Citi Trust exchanges personal data with Cititrust (Bahamas) Limited, Cititrust (Switzerland) Limited, and Cititrust (Singapore) Limited servers for data processing on most Citi Trust relationships.
  - (b) Citi Trust exchanges personal data with Citigroup in Singapore, Switzerland, the United Kingdom, Poland, Canada, and the United States for archiving account information and emails and for security event monitoring of systems.
  - (c) Citigroup and its contractors store data on a regional database (such as in Switzerland for EMEA relationships). To ensure re global consistency, enhance security and facilitate quicker delivery of services, Citigroup copies all the data held in one regional database to our other regional databases. This means that data can be held in duplicate in the regional databases.
  - (d) Hardware and software providers store and process personal data, such as when documents are saved in Microsoft office applications.

For transfers outside the Relevant Jurisdictions, we maintain physical, electronic and procedural safeguards, including data transfer agreements under UK and European Commission-approved standard contractual clauses within Citigroup or with Citigroup contractors, and strong encryption to protect your data. We may also rely on other permitted data transfer mechanisms including binding corporate rules in respect of transfers of data (approved by EU data protection authorities and put in place to protect personal data). These mechanisms vary over time. Where a trust, company and assets are multi-jurisdictional and managed with offices in other countries, such data may become subject to the legal disclosure requirements of other countries, which may have differing laws relating to the degree of confidentiality afforded to client information and such data may become subject to their laws and disclosure requirements.

- 6.7 **To Service Providers.** Where supplemental services requested by a Client or arranged by Citi Trust, occur. For example, Citi Trust and Citigroup exchange personal data with the following.
- (a) Citigroup or external investment managers to choose suitable investments.
  - (b) A Citigroup or external insurance company or insurance broker whose policy is held in a Trust or PIC or connected with your Cititrust relationship;
  - (c) External registered agents, branch managers, and resident directors who set up and maintain a PIC, including Singapore solicitors Rajah & Tann.
  - (d) External property managers who maintain real, immovable property in a PIC or Trust.
  - (e) Citigroup and external firms to complete and check tax forms and to determine and review Tax Act status and Tax Act obligations, including accounting firms PwC, Deloitte, KPMG and EY.
  - (f) External firms such as EY to corroborate and file information in beneficial owner registers.
  - (g) External data aggregation firms to assist with the reporting of third party account asset information. .
  - (h) External successor trustees and PIC managers.

- 6.8 **To Accountants.** Where financial statements and any reports are prepared. For example, personal data may be processed and exchanged with Citigroup and external accountants, auditors, and data input staff, such as Cititrust (Bahamas) Limited and Tata Consultancy Services in India and Poland.
- 6.9 **To Management.** Where Citi Trust and Citigroup managers supervise business, such as in The Bahamas, Switzerland, Jersey, Singapore, the United Kingdom, and the United States.
- 6.10 **To Control, Operations, and Technology Functions.** Where Citi Trust and Citigroup compliance, business risk, risk, legal, tax, operations, risk management, technology production management, and finance functions work, such as in The Bahamas, Switzerland, Jersey, Singapore, the United Kingdom, Poland, Costa Rica, the Philippines, India and the United States.
- 6.11 **To Fee Billing Unit.** Where fee bills are prepared. For example, Citi Trust processes and exchanges personal data with the Cititrust (Bahamas) Limited fee billing unit.
- 6.12 **To Special Asset Management Unit and Investment Officers.** Where special assets and economic substance issues are reviewed by Citigroup special asset unit, such as in Jersey and the United States.
- 6.13 **To Investment Officers.** Where discretionary trust investments are reviewed by Citigroup investment specialists officers in the United States.
- 6.14 **To Reporting and Account Documentation Team.** Where trust and PIC tax, beneficial owner, and economic substance reporting are arranged by Citi Trust reporting and accounting documentation team in Jersey.
- 6.15 **To Finance and Risk Shared Services Team.** Where trust and PIC tax reporting are supported or arranged by Citigroup finance and risk shared services team in the United States, Switzerland and India.
- 6.16 **To Tax Service Providers.** Where tax forms are completed and checked and where Citi Trust and Citigroup decide to share and consolidate documentation and information to determine, verify, and periodically review Tax Act status and Tax Act obligations.
- 6.17 **To Government Authorities.** Where a Tax Act or other law such as beneficial owner disclosure and economic substance laws, call for reporting, such as to The Bahamas, Cayman Islands, Jersey, Singapore, Switzerland, the United Kingdom, British Virgin Islands, and the United States.

## 7. For how long does Citi Trust store your personal data?

Citi Trust and Related Parties shall keep your personal data for as long as is required in order to fulfil contractual and fiduciary obligations to you and other Interest Holders, and for such other suitable period reflecting the applicable retention laws and regulations and limitation periods. After your lifetime, any residual privacy and data protection rights are abandoned and waived to the extent permitted by law. Where personal data is processed solely with your consent, it shall be processed until you ask Citi Trust to stop, and for a reasonable period afterwards to allow Citi Trust or a Related Party to comply with your request, unless another legal justification permits continued processing.

## 8. What automated decision making does Citi Trust carry out?

- 8.1 **No Automated Decision Making.** All Citi Trust decisions are conducted and/or checked by natural persons. Citi Trust does not use any fully automated decision-making in providing fiduciary services to you. If Citi Trust decides to use automated decision-making in the future in relation to any product or service, Citi Trust shall provide further information about what is involved and explain the significance and envisaged consequences of the processing for you.
- 8.2 **Prior Consent to New Automated Decision Making.** For the activities described above, we will seek your consent for this unless we have to do it in order to enter into, or to perform, a contract with you or where we are authorized by law in the EU to carry out this activity. You have the right to request a person to re-assess any decision.

## 9. What are your rights in relation to personal data?

- 9.1 To Review your personal data.** You can ask Citi Trust to:
- provide a copy of your personal data;
  - correct your personal data;
  - erase your personal data;
  - transfer your personal data to other organizations; and
  - restrict processing of your personal data.
- 9.2 To Object to processing.** You can also object to some processing of your personal data, including in relation to direct marketing and where Citi Trust or a Related Party process your information because this is in Citi Trust, a Related Party, or an Interest Holder's legitimate interests.
- 9.3 Limits to your Rights.** There may be situations in which Citi Trust, a Related Party, or a controller can refuse to comply, either wholly or partly, with a request from you under this section. For example, where Citi Trust or a Related Party are required to process, retain or maintain the confidentiality of your personal data by law or in order to exercise a power or discretion or perform a duty under a trust arrangement. In addition, governments that are required by law to make personal data public are exempt from many privacy rights, such as the UK's Register of Overseas Entities, which must publish the names of beneficial owners of PICs that own or pledge UK real estate.
- 9.4 Exercise of Your Rights.** If you wish to exercise these rights or if you have any queries about your personal data or whether these rights apply in the circumstances, please contact your Citi Trust trust officer or the Data Protection Officer or Advisor in Section 2 above. If you have any unresolved concern, then you have the right to complain to the relevant data protection authorities. You can bring the complaint in the country where you reside, where you work, or where the alleged infringement of data protection law occurred or to the data protection authority where Citi Trust operates in Jersey or Switzerland.

## 10. How do we monitor our obligations to protect your personal data?

Citi Trust and Citigroup take protection of personal data very seriously and have implemented a global information security program based on input from regulatory authorities and recognised industry standards. While data protection is a priority for all staff, our regional and global information security officers are responsible for implementation and monitoring of the security program, including risk assessments, security plan development and maintenance, correction action and audits. The threat landscape is constantly monitored and Citigroup subscribes to industry-leading vulnerability monitoring services. Citigroup invests in expert intelligence gathering services to help protect its systems and data from unauthorised access, including vetting and ongoing monitoring of its third-party service providers. Extensive training is undertaken by all staff, and our security officers ensure data protection awareness throughout Citigroup.

## 11. Information about personal data protection laws

- 11.1 European Law.** Your data is subject to the laws of the jurisdiction of the Citi Trust or Related Party processing your data. This Privacy Statement is based on EU data protection law, or where relevant the equivalent laws in the EEA, Jersey, Switzerland, UK, or United States. These data protection laws may not apply if:
- you do not receive services from Citi Trust or Citigroup in the EU, EEA, Jersey, or Switzerland,
  - you are not resident or located in these jurisdictions while receiving services, and
  - your personal data is processed outside these jurisdictions.
- 11.2 California Law.** California residents should refer to Annex B.
- 11.3 Swiss Law.** Swiss residents and those receiving services from a Citi Trust or a Related Party in Switzerland should refer to Annex C.
- 11.4 Other Law.** Additional terms may apply where Citi Trust or a Related Party process your personal data in other jurisdictions.

## 12. Changes to this Privacy Statement

Citi Trust may modify this Privacy Statement at any time, and post the modified versions on our website at <https://www.privatebank.citibank.com/home/citi-private-bank-privacy-and-security.html> in accordance with Citi Trust's published *Terms and Conditions* in force from time to time. Citi Trust encourages you to regularly review this Privacy Statement to ensure that you are always aware of how personal data is processed.

## Annex A

### Related Parties who process personal data.

#### Europe, Middle East & Africa

1. Citibank, N.A., London Branch, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. Telephone +44 207 7500 5000
2. Citibank (Switzerland) AG, Hardstrasse 201, 8005 Zurich, Switzerland. Telephone +41 58 750 5000
3. Citibank Europe plc, Spain Branch, Calle Jose Ortega Y Gasset 29, 2<sup>nd</sup> Floor, 28006, Madrid, Spain. Telephone +34 915384400
4. Citibank Europe plc, Polish Branch, 36 Prosta Street, 00-838 Warsaw, Poland. Telephone: +48 22 690 44 00
5. Citibank NA Jersey, PO Box 470 38 Esplanade St. Helier Jersey

#### North America and Latin America

1. Citibank N.A., 5800 S. Corporate Place Sioux Falls, SD 57108 United States
2. Citibank, N.A., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559 - 1000
3. Citibank, N.A., 3800 Citigroup Center Drive, Tampa FL 33610-9122, United States. Telephone +1-813-664-8534
4. Citi Business Services Costa Rica SRL, Carretera A Belen Edificio, Heredia, CR 00107, Telephone +506 4051 6232
5. Citigroup Global Markets Inc, 388 Greenwich Street New York, NY 10013 United States

#### Asia Pacific

1. Citibank, N.A., Singapore Branch, 8 Marina View, #20-01 Asia Square Tower One, Singapore 018960. Telephone +65 6595 7777
2. Citicorp Services India Private Limited, B6, 7th Floor, Nirlon Knowledge Park, Goregaon (East), Mumbai Maharashtra INDIA 400063.

## [Annex B](#)

### Supplemental rights for California residents.

California residents have certain rights with respect to Personal Information under the California Consumer Privacy Act (**CCPA**). For purposes of this Annex B, the terms and definitions in the CCPA apply and may differ from terms elsewhere in this Privacy Statement. Citi Trust does not sell Personal Information. Citi Trust does not share Personal Information for advertising.

#### 1. **Requests.**

- (A) **Right to Know and Access.** You have the right to request, up to two times every 12 months, that Citi Trust disclose to you the following.
- i. the categories of Personal Information that Citi Trust has collected about you;
  - ii. the categories of sources from which Citi Trust has collected Personal Information about you;
  - iii. the business or commercial purpose for collecting, selling, or sharing your Personal Information;
  - iv. the categories of Third Parties to whom the Personal Information was disclosed and
  - v. the specific pieces of Personal Information that Citi Trust has collected about you.
- (B) **Right to Data Portability.** You have the right to request a portable copy of your Personal Information.

In response to verified requests under (A) or (B) above, Citi Trust will confirm receipt of the request within 10 business days of receipt of the request, and disclose and deliver the required information to you free of charge within 45 days of receiving a verifiable consumer request. We may extend this time period to deliver information once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

- (C) **Right to Delete.** You have the right to request that Citi Trust delete Personal Information collected from you, subject to certain exceptions allowed under applicable law.

In response to verified requests pursuant to (C) above, we will confirm receipt of the request within 10 business days of receipt of the request. Following verification of your request, we may require you to separately confirm that you want your Personal Information to be deleted. We will delete the information within 45 days of receiving a verifiable consumer request (subject to certain exceptions). We may extend this time period once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

- (D) **Right to Correct.** You have the right to request that Citi Trust correct inaccurate Personal Information collected from you, subject to certain exceptions allowed under applicable law. We will accept, review, and consider any documentation that you provide in connection with your right to correct, provided you make a good-faith effort to provide Citi Trust with all relevant information available at the time of the request.

In response to verified requests pursuant to (D) above, we will confirm receipt of the request within 10 business days of receipt of the request. Following verification of your request, we may require you to provide documentation if necessary to rebut our own documentation that the Personal Information is accurate. If, we determine, based on the totality of the circumstances, that the information is not accurate, we will respond to the request by correcting the information or deleting the information (if deletion of the information does not negatively impact you). We will correct within 45 days of receiving a verifiable consumer request. We may extend this time period once by an additional 45 days when reasonably necessary. We will provide notice of the extension within the first 45-day period.

- (E) **Right to No Discrimination.** Citi Trust will not discriminate against you because you elect to exercise these rights, including by:
- Denying goods or services to you.
  - Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.

- Providing a different level or quality of goods or services to you.
  - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.
2. **Submission of Requests.** You may exercise these rights through Citigroup's Privacy Hub at [online.citi.com/dataprivacyhub](https://online.citi.com/dataprivacyhub) or by calling us at [\(833\) 981 0270](tel:8339810270) (TTY: 711).
  3. **CCPA Authorized Agent.** CCPA permits consumers to designate authorized agents to submit requests on their behalf. Under CCPA, an authorized agent is a natural person or a business entity in California that a consumer has authorized to act on their behalf subject to the requirements. If you would like to designate an authorized agent to submit a request to know, a request to delete, or a request to correct Personal Information on your behalf, please call Citigroup at [\(833\) 981 0270](tel:8339810270) (TTY: 711). You or your authorized agent may provide us with a written power of attorney, executed by you, confirming the authority of the authorized agent with respect to your CCPA request(s). If we have not received a power of attorney, we may require your authorized agent to provide proof that you gave the agent signed permission to submit your CCPA request(s). In addition, we may also require you to do the following directly with us:
    - (A) Verify your own identity with us;
    - (B) Confirm you have provided the authorized agent permission to submit the CCPA request(s).Subject to verification below, your authorized agent may create a unique account for you through Citigroup's Privacy Hub at [online.citi.com/dataprivacyhub](https://online.citi.com/dataprivacyhub) and manage your requests through that account.
  4. **Verification.** Whether you submit a request directly on your own behalf, or through an authorized agent, Citi Trust will take reasonable steps to verify your identity prior to responding to your requests under CCPA. Upon receiving a request pursuant to I(B), I(C) or I(D) above, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. In order to verify your request, we will require you to provide your social security number, tax ID number or passport/identification number and issuing country, in addition to your first and last name, e-mail address and mailing address.

## Annex C

### Supplemental information for Personal data protected by the Swiss Federal Data Protection Act

This annex is intended to provide you with further information for Personal data protected by the Swiss Federal Data Protection Act, as amended from time to time (hereinafter the “**FDPA**”). Save as otherwise set out in this annex, the provisions of the Privacy Statement shall apply. Where there is a conflict or ambiguity between the Privacy Statement and this annex, this annex shall prevail.

#### 1. **Where does Citi Trust transfer your personal data?**

In addition to the information included in this Privacy Statement, you may refer to the separate ‘Appendix’ included in the ‘Swiss Federal Data Protection Act (FDPA) – Information Notice’ available on <https://www.privatebank.citibank.com/home/citi-private-bank-privacy-and-security.html> for a list of jurisdictions in which your personal data may be processed from time to time.

For transfers to countries not providing adequate data protection, as published by the Swiss government from time to time, we maintain physical, electronic and procedural safeguards, including data transfer agreements under European Commission-approved standard contractual clauses to protect your Personal data.

#### 2. **What are your rights in relation to personal data?**

In addition to the rights mentioned in the applicable Privacy Statement, you may request that a note of contest is added in case if neither the accuracy nor the inaccuracy of the Personal data in question can be established.