

Private Bank



Privacy Statement

Citi Private Bank (EMEA)

January 2021

This Privacy Statement explains how Citi Private Bank processes personal data about individuals, including its clients and their beneficiaries, family members, signatories, attorneys and associates. This Privacy Statement includes information about your data protection rights, including a right to object to some processing.

This Privacy Statement takes effect on 1 January 2021.

1. When does this Privacy Statement apply to you?

1.1 It applies if:

- a) you, or the corporate or institution you are associated with, receive financial services (or will prospectively receive financial services) from a Citi entity, branch or office in a Member State of the European Union (“EU”), the European Economic Area (“EEA”), the United Kingdom (“UK”), Switzerland or Jersey, including Citibank N.A. (London, Jersey, Geneva and Zürich Branches), Citibank Europe plc (UK, Luxembourg, Spain and Italy Branches) or Citibank Switzerland AG;
- b) you are resident in, or located in, any of the locations identified in (a) while you receive financial services from a Citi entity, branch or office established outside of the locations identified in (a), including Citibank N.A., Citi Private Advisory LLC, Citicorp USA Inc., Citicorp North America Inc., Citibank Canada, Citibank Canada Investment Funds Limited, Citibank N.A. Hong Kong Branch, Citibank N.A. Singapore Branch and Citibank N.A. India Branch, noting that this privacy statement is supplemental to the privacy statements referred to in clause 11 below; and/or
- c) your personal data is otherwise processed by a Citi entity, branch or office in a location referred to in (a).

1.2 When we refer to “Citi”, we mean the Citi entities listed above that are relevant to you. In almost all customer relationships Citi will act as an independent Data Controller. Exceptionally Citi will act as a “Data Processor” including in payment agency and similar agreements where we act only on your instructions and neither exercise any discretion nor process data for compliance with applicable law. This Privacy Statement shall be applicable where we act as a controller unless otherwise indicated in a contract where we hold ourselves as a data processor. When we refer to a “Citi Company” or “Citi Companies” we mean another part of our group now or in the future. This includes the entities that can be found in the links on this webpage from time to time: <http://www.citigroup.com/citi/about/countrypresence/>

1.3 Where this Privacy Statement applies to you and there is any conflict between any contract you have entered with Citi and this Privacy Statement, in relation to how we treat data that is covered by this Privacy Statement, the provisions of this Privacy Statement shall prevail.

2. How can you contact Citi?

2.1 The contact details for the data controllers can be found in the Annex to this privacy statement.

2.2 If you have any questions or requests in relation to your personal data, please contact your Private Banker or you can contact the Chief Data Protection Officer by mail at Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB; or by email to Dataprotectionofficer@citi.com

3. Why does Citi process your personal data?

3.1 We process your personal data for the reasons set out below.

<p>a) Where the processing is necessary for us to perform a contract with you or for requested pre-contract steps</p>	<ul style="list-style-type: none"> • To provide financial services and products and ancillary services to you where you have a contract with us and to operate, maintain, and manage your account(s) pursuant to that contract. This includes processing of instructions and generation of confirmations, advices and statements and the carrying out of instructions. • For pre-contract measures you request prior to entering into a contract with us, including to assess your needs in relation to specific products or services and to determine the level of advice, asset management or support that you need. • When you or our client instruct(s) us to make a payment from an account to a third party's account. • To allow a third party payment provider to access your personal and transactional data and/or initiate payment transactions as described in your account terms and conditions.
<p>(b) Where we are required by UK law, EU law, EEA Member State or the law of any applicable jurisdiction</p>	<ul style="list-style-type: none"> • To disclose information to governmental entities or regulatory authorities, financial markets, brokers or other intermediaries or counterparties, courts or other parties. • 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 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 onboarding and sanctions screening (which involves the screening of clients details against published sanctions lists). If you are unwilling to provide your personal data in these circumstances, then we may be unable to provide (or continue providing) the relevant product or service to you or our client. • For AML and transaction reporting purposes or any other reporting required by our regulators.

<p>(b) Where we are required by UK law, EU law, EEA Member State or the law of any applicable jurisdiction (<i>continued</i>)</p>	<ul style="list-style-type: none"> • <i>To disclose information in relation to you and/or our client in order to comply with any shareholder identification and disclosure request received from any company.</i> • <i>For tax purposes.</i> • <i>To assess if investments are suitable or appropriate for you based on your investment knowledge and experience.</i> • <i>To investigate and remediate any security incidents and/or data protection breaches in any of our information systems.</i>
<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</p> <p>We will perform a balancing test of the interests prior to relying on legitimate interest to process personal data.</p>	<ul style="list-style-type: none"> • <i>To provide financial services and products and ancillary services to our clients and to communicate with you about these, including for marketing purposes, unless we need consent to provide that service or communication.</i> • <i>To assess the needs of our clients in relation to specific products or services, to assess whether our clients are eligible for particular products, to determine the level of advice, asset management or support that a client needs or carry out transactions in compliance with contractual obligations.</i> • <i>To assess whether any other Citi businesses might have any products or services which we believe would be of interest to any corporate entities that you are associated with, noting that we will not share information about you with other Citi businesses for this purpose, without first confirming with you.</i> • <i>To manage and administer Citi's business and to manage and improve relationships with you and our clients and assist with client management and for marketing and business development activities and analysis.</i> • <i>To inform you about our products or services or any products and services of any Citi Companies, to the extent permitted by law and subject to your contact preference options.</i> • <i>To monitor and analyse the use of Citi services, for risk assessment and control, for statistical and trend analysis, for system administration, operation, testing and support and to operate control systems and management information systems.</i> • <i>To carry out a credit analysis in relation to your ability to relay any credit facility that you have requested from us.</i> • <i>To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity.</i> • <i>To manage our information technology, and data and to ensure the security of our systems.</i> • <i>To disclose information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors or other third parties including third parties who assist us in complying with our regulatory or legal requirements, and to conduct compliance activities, when we think this is in our, or someone else's interests, but where EU and/or UK law does not require us to make this disclosure or conduct these activities.</i> • <i>To meet a regulatory obligation in a country outside the EU or the UK.</i> • <i>To disclose information to other Citi entities or third parties, including those outside the UK or EU, in order to best assist us with complying with our regulatory requirements.</i> • <i>To establish, exercise or defend legal claims and in order to protect and enforce Citi's rights, property, or safety, or to assist our clients or others to do this.</i> • <i>To investigate and respond to any complaints about us or our business or any incidents relating to us or our business and to help maintain service quality and train staff, to deal with complaints and disputes.</i> • <i>To make certain assessments about you and profile you in order to assess your investment objectives, risk tolerance, and understanding of investment risk to assess your ability to repay any loans and to generally tailor our service to your needs.</i>
<p>(d) Where you consent</p>	<ul style="list-style-type: none"> • <i>To carry out compliance activities using information about political affiliation and office and criminal convictions and sanctions. In some countries we do not need your consent to process this information.</i> • <i>For compliance with any regulatory requirements where we use a third party service provider to assist us comply with our requirements and your consent is required.</i> • <i>For direct marketing from Citi, where the law says we need your consent.</i> • <i>For the provision of payment services, where the law says we need your consent.</i> <p><i>You can withdraw your consent at any time. However, please consult with your Private Banker if you have concerns in relation to consent and before refusing or revoking consent because if we need your consent to process political affiliation and office and criminal conviction and sanctions information, or to carry out any other activity, we may not be able to provide, or continue to provide, some or all of our services to you or our clients without such consent. If you withdraw consent this will not affect any processing of your information which has already taken place by that date.</i></p>

4. Where does Citi obtain information about you?

4.1 We process information that you provide to us directly and information we learn about you from our communications and dealings with you, such as data and cookies collected from your interactions with our website and InView (subject to your cookie choices), information about Citi publications and products you interact with in third party platforms and your responses when we send you emails and other communications (subject to your marketing contact preferences). We also obtain some information about you from other sources, as set out below:

(a) Our clients	<i>A prospective or existing individual, corporate or institutional client of ours may provide us with information in relation to you if you are associated with that client and/or they think you may be interested in our products or services. Our clients who give us this information may be based inside or outside your country (or the EU, if your country is an EU Member State). We obtain your name, company, title and job description and contact details such as email address and telephone number or business address.</i>
(b) Public sources	<i>Sources both inside and outside your country, the UK and the EU, such as news outlets, websites and other media sources, international sanctions lists, any publicly available databases or data sources. Data we may obtain may include your name, company, title and job description and contact details such as email address and telephone number or business address, details about your personal or business interests or activities.</i>
(c) Other sources	<i>Any research agencies who may carry out research on our behalf both inside and outside your country, the UK and the EU. The data we may obtain could include any of the data listed in sections 4.1 (a) and (b).</i>

5. To whom does Citi disclose your personal data?

5.1 We disclose your personal data to others as follows:

- a) to any Citi Company for the purpose of managing our and their relationship with you and/or, where appropriate, so that we (as their intermediaries) or they may offer their products and services to you or, where permitted, to any corporate entity associated with you, including any company in which you may be deemed a shareholder and where we may be required to disclose your information under applicable law, or any third party nominated by such company, and for any other purposes identified in this Privacy Statement and to any Citi Company that in any way assists us in carrying out our business or in providing products and services to our clients (including where that Citi Company assists us to assess the risk with any credit we provide to you);
- b) to our client in connection with the products and services we provide, and for any other relevant purposes set out in this Privacy Statement;
- c) at the request of any counterparty bank, payment infrastructure provider, custodian, sub-custodian, fund house, fund administrator, issuer of securities (including their affiliates), or other third party, engaged in relation to any payment or investment or business process and to service your accounts and investment as per the provisions of any specific product or service agreement relevant to such investment or service. If you are deemed to be an ultimate beneficial owner of an EU, Jersey or Swiss company or legal entity, your personal data may be required to be made available on a central public register of beneficial owners in the relevant jurisdiction in accordance with applicable law;
- d) in respect of any lending, to any insurance providers or valuers who assess the adequacy of any security provided, any obligor or guarantor or any prospective assignee or transferee or sub-participant, any person or entity in connection with any securitisation of all or any part of our loan assets, any insurers (including credit insurers) or hedge counterparty, or any of their affiliates or our affiliates;
- e) to other Citi Companies and third party service providers who in any way assist us in carrying out our business or in providing products and services to our clients, or assist us in complying with any applicable legal or regulatory requirement, including parties who provide printing and mailing facilities to us, storage and archiving facilities and parties who assist us to manage our information technology and to provide our clients with digital options to interact with us;
- f) to other Citi Companies and third party service providers who assist us with our regulatory reporting obligations and with the processing of instructions, transactions and the generation of confirmations, advices, statements or any other information that we are required to provide to you;
- g) as required in order to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our clients and in order to protect the rights, property, or safety of us, our business, any Citi entities, our clients or others including to legal, tax or other professional advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
- h) to any competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction where we are required to do so under the relevant law (including both UK and EU law, but also other applicable laws) or we otherwise deem it is appropriate to share the information. This may include, but is not limited to, any of the following circumstances: (i) for or in connection with an examination of us by bank or other examiners; (ii) pursuant to subpoena or other legal process; (iii) at the express direction of any other authorised government agency; (iv) to our internal or external attorneys or auditors; (v) to others to whom we are required to make such disclosure by applicable law; and (vi) to anyone where we deem it is appropriate in order to meet our legal obligations (including under both UK and EU law, but also under other applicable laws); and
- i) to third parties in connection with a change of ownership in Citi Private Bank or any of its assets.

6. Where does Citi transfer your personal data?

- 6.1 We transfer your personal data to Citi Companies (see the link in Section 1.2 for their locations) and to third parties (such as banks, security exchanges and financial or account service providers and other service providers) who are located both in the jurisdiction where you hold your account and outside that jurisdiction. This may include data being transferred by us, for the reasons outlined in this Privacy Statement, to Citi Companies and third parties outside the EU and UK. We may also use cloud services providers to process your data under appropriate technology and operational security measures.
- 6.2 In general your data is stored by the Citi entity with whom you have an account and/or (if different) the Citi entity which employs your banker or other Citi advisor. Your data will also be stored on a regional database. The regional database for clients booked with our EMEA booking centres is in Switzerland. In addition, in order to ensure global consistency, enhance security and facilitate quicker delivery of services to you, we may also copy all the data held in each regional database to our other regional databases. This means that your data can be held in duplicate in the regional databases in the United States, Singapore and Switzerland.
- 6.3 For transfers outside the EU and the UK, we maintain physical, electronic and procedural safeguards, including data transfer agreements under UK and European Commission-approved standard contractual clauses within Citi or with the relevant third party, to protect your personal data, and strong encryption to protect your data. We also rely on other permitted data transfer mechanisms including binding corporate rules in respect of transfers of staff and contractor data (approved by EU data protection authorities and put in place to protect personal data). These mechanisms vary over time.
- 6.4 Where your accounts and data are multi-jurisdictional and managed jointly with other Private Bank offices, 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 the laws and disclosure requirements thereof.

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

Where we process personal data in connection with performing an agreement we have with you or our client, we keep your personal data for as long as is required in order to fulfil our contractual obligations to you or our clients and such other suitable period reflecting the statutory limitation period under the laws of that contract.

Where we process personal data in connection with a legal obligation (for example for AML purposes) such personal data will be kept for as long as is required under the relevant local law.

Where we process personal data solely with your consent, we process the personal data for as long as is necessary or you ask us to stop, and for a reasonable period afterwards to allow us to comply with your request.

Where we process personal data in connection with our or a third party's legitimate interests and where your interests do not override these interests, we keep your personal data for as long as is necessary to comply with such purposes and any legal obligation, or until you object to such processing and there is no other reason for us to process it.

Generally, we will store data about you for as long as you continue to have a relationship with us and for a suitable period after any such relationship has terminated to ensure that we meet any regulatory data retention requirement in the booking centre where you held an account.

8. What automated decision-taking does Citi carry out?

- 8.1 We generally do not use any automated decision-making in providing services to you. However, we may use automated decision-making in relation to an automated loan offering facility. Where we do so, we will inform you at the point of application that we engage in this type of activity, provide further information about what is involved, explain the significance, and envisaged consequences of the processing for you.
- 8.2 For the activities described in Section 8.1, 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 authorised by law in the EU, the UK, Switzerland or Jersey, as appropriate, 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 You can ask us to: (a) provide a copy of your personal data; (b) correct your personal data; (c) erase your personal data; (d) transfer your personal data to other organisations; and (e) restrict processing of your personal data. You can also object to some processing of your personal data, including in relation to direct marketing and where we process your information because this is in our legitimate interests (see Section 3.1(c)). These rights may be limited in some situations; for example, where we are required to process your personal data by law. You may also at any time withdraw your consent (see Section 3.1(d) above).
- 9.2 You can change your marketing preferences at any time by contacting your Private Banker.
- 9.3 If you wish to exercise these rights or if you have any queries about your personal data, please contact your Private Banker or the Chief Data Protection Officer using the contact details in Section 2 above. You also 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.

10. Further information about UK, Jersey and Swiss branches

If you are a client of Citibank Europe plc, UK Branch or Citibank, N.A., London Branch, the treatment and transfer of your Personal Data is governed by UK law, including the EU General Data Protection Regulation 2016/679 and the Privacy and Electronic Communications Directive 2002 (as implemented in UK law by the Privacy Electronic Communications and Data Protections (Amendment etc) (EU Exit) Regulations 2019 and the Data Protection Act 2018, and your UK Banking and Investment Services Terms or product terms.

If you are a client of Citibank N.A. Jersey Branch the treatment and transfer of your Personal Data is governed by Jersey law, such as the Data Protection (Jersey) Law 2018, and your Jersey Banking and Investment Services Terms or product terms.

If you are a client of Citibank Switzerland AG or Citibank N.A. (Swiss Branches) the treatment and transfer of your personal data is generally governed by Swiss laws and regulations, as amended from time to time, together with your Swiss General Terms and Conditions or specific product terms.

You should note that UK, Jersey and Swiss data protection legislation is historically closely tied to EU laws and regulations and EU law imposes high standards of personal data protection with extra-territorial reach which means that entities outside the EU are, in certain circumstances, bound by such EU provisions.

11. Information about personal data protection laws in the United States, Latin America, Singapore and Hong Kong

If you are receiving financial services from a Citi entity referred to in Section 1.1(b) of this Privacy Statement, your data will be subject to the legal framework of the jurisdiction of that entity and the provisions of this Privacy Statement will be supplemental to the local privacy statement, notice or circular applicable to that entity.

For the United States and Latin America: [Citi Private Bank \(NAM & LATAM\) Privacy Notice](#)

For Singapore: [Citibank Singapore Circular relating to the Personal Data Protection Act](#)

For Hong Kong: [Circular relating to Personal Data \(Privacy\) Ordinance and Usage of Customer Information](#)

12. Changes to this Privacy Statement

If we modify this Privacy Statement at any time you will be able to locate the modified versions on our website at <https://www.privatebank.citibank.com/home/citi-private-bank-privacy-and-security.html>. We encourage you to regularly review this Privacy Statement to ensure that you are always aware of what personal data we collect and how we use, store and disclose it.

Annex

Details of Citi Private Bank data controllers by region.

Europe, Middle East & Africa

- Citibank, N.A., London Branch, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. Telephone +44 207 7500 5000
- Citibank, N.A., Jersey Branch, P.O. Box 104, 38 Esplanade, St. Helier, Jersey, JE4 8QB, Channel Islands. Telephone +44 1534 60 8000
- Citibank, N.A., Sioux Falls, Geneva Branch, Quai de la Poste 2, 1204 Geneva, Switzerland. Telephone +41 58 750 7000
- Citibank, N.A., Sioux Falls, Zurich Branch, Hardstrasse 201, 8005 Zurich, Switzerland. Telephone +41 58 750 7000
- Citibank (Switzerland) AG, Hardstrasse 201, 8005 Zurich, Switzerland. Telephone +41 58 750 5000
- Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. Telephone +44 20 7500 5000
- Citibank Europe plc, Spanish Branch, Calle Jose Ortega Y Gasset 29, 2nd Floor, 28006, Madrid, Spain. Telephone +34, 915384400
- Citibank Europe plc, Italy Branch, Milan, Via dei Mercanti number 12. Telephone +39 02 89061
- Citibank Europe plc, Luxembourg Branch, 31, Z.A. Bourmicht L-8070 Bertrange, Grand Duchy of Luxembourg. Telephone +352 45 14141

North America and Latin America

- Citibank, N.A., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559 -000
- Citigroup Global Markets Inc., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559-1000
- Citi Private Advisory LLC, 388 Greenwich Street, New York, NY 10013, United States. Telephone +1-212-559-1000
- Citicorp USA Inc., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1 212-559-1000
- Citicorp North America Inc., 388 Greenwich Street, New York, NY 10013, United States. Telephone +1 212-559-1000
- Citibank Canada, 123 Front Street West, Suite 2000, Toronto, Ontario, M5J 2M3. Telephone +1-416-947-5300
- Citibank Canada Investment Funds Limited, 123 Front Street West, Suite 2000, Toronto, Ontario, M5J 2M3. Telephone +1-416-947-5300

Asia Pacific

- Citibank, N.A., Hong Kong Branch, 30/F, Champion Tower, 3 Garden Road, Central, Hong Kong. Telephone +852 3419 8522
- Citibank, N.A., Singapore Branch, 8 Marina View, #20-01 Asia Square Tower One, Singapore 018960. Telephone +65 6595 7777
- Citibank, N.A., India Branch, FIFC, 14th Floor, Plot Nos. C-54 & C-55, Block G, Bandra Kurla Complex, Bandra (East), Mumbai, 400 098. Telephone +91 22 6175 9999