



**BINDING CORPORATE RULES:**

**CITI PRIVACY PROCEDURE FOR TRANSFERRED EUROPEAN WORKFORCE  
DATA**

This procedure should be read in conjunction with the 'Third Party Beneficiary Deed' which explains how you enforce your rights under this procedure. Both documents are published together on Citi's intranet

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# 1 INTRODUCTION

## 1.1 Objective

The purpose of this Procedure is to make arrangements for Workforce Data, in accordance with European Data Protection Law, defined at section 2.9 below, which will provide adequate protection when Workforce Data is transferred to Citi businesses in Relevant Countries.

## 1.2 Scope

This Procedure applies to Citigroup Inc. and its consolidated subsidiaries, including Citibank N.A. (all referred to herein as Citi) whenever they Transfer or Process Transferred Workforce Data. The entities required to comply with this Procedure are listed in Appendix 4.

Citi Processes a wide range of Workforce Data, which includes, but is not limited to: contact information, biographical information held in connection with compensation and benefits information, work, time management and reporting line information, education, talent, volunteer and training information and government-related information (such as tax data).

Citi Processes this information for business purposes such as communicating with its staff, maintaining continuity of business, expense management, administering compensation and benefits, and managing its workforce, business and operations. In addition, Citi may handle this information in connection with legal claims and/or for legal, compliance, internal audit, regulatory and investigative purposes (including disclosure of such information in response to, or in connection with, legal process or litigation).

Because Citi is a global organisation, Workforce Data may be handled by a range of Citi entities and suppliers worldwide – for example, where IT services are performed by one or more Citi entities on behalf of others. In addition, Citi may disclose information about Workers to third parties wherever Citi does business, for business or operational purposes or where required or permitted by law.

Participating Countries require Citi to ensure that there is adequate protection for Workforce Data before it is transferred to Relevant Countries. Citi has implemented this Procedure to meet this requirement and to facilitate the transfer of Workforce Data within Citi.

Further details regarding the Transfers carried out under this Procedure are set out in Appendix 5.

### 1.3 Target Audience

This Procedure applies generally throughout Citi. It has particular significance for Employees and Non-Employees with access to Workforce Data or who are involved in the development, procurement, or management of IT applications which process Workforce Data. It is also relevant to Workers, as it explains how Citi may Process Transferred Workforce Data.

### 1.4 Effective Date / Transition Period

This Procedure takes effect on [ • ] and supersedes the previous version of this Procedure.

### 1.5 Retired Policies / Related Policies

This is a Citi-wide procedure that applies to Transferred Workforce Data. It should be read in conjunction with any sector or business-level policies and procedures on this subject, which must be consistent with the requirements of this Procedure.

### 1.6 Exceptions

Deviation requests shall be made to and authorised by the HR Chief Data Officer.

Citi may deviate from this Procedure where such deviations are lawful under the law of the Participating Country, from which the Workforce Data was Transferred.

If an individual believes that local law prevents compliance with this Procedure and that local law has a substantial adverse effect on the requirements of this Procedure, they must promptly inform the Principal Contact, unless this is prohibited by law.

If a conflict between applicable local law and this Procedure is reported, this conflict shall be referred to the Principal Contact, who will be responsible for determining the action to take, in accordance with section 19 of this Procedure and applicable law.

## 2 DEFINITIONS

- 2.1 “Binding Corporate Rules” means this Procedure and the Third-Party Beneficiary Deed, which Citi uses to ensure that there is adequate protection for Transferred Workforce Data.
- 2.2 “Contracting Requirements for Contracts Relating to Transferred Workforce Data” means the requirements set out in Appendix 1 of this Procedure.
- 2.3 “Data Controller” means any legal entity, which alone or jointly with others, determines the purposes and means of processing of Workforce Data.
- 2.4 “Data Exporter” means any legal entity located in the European Economic Area,

Switzerland, Monaco or Jersey that Transfers Workforce Data to a Relevant Country pursuant to the Binding Corporate Rules.

- 2.5 “Data Importer” means any legal entity located in, or which processes Workforce Data in a Relevant Country.
- 2.6 “Data Processor” means any legal entity which processes Workforce Data on behalf of the Data Controller.
- 2.7 “Data Protection Authority” means:
- 2.7.1 the supervisory authority that is the lead authority for the Binding Corporate Rules, which is the Data Protection Commission in Ireland; or
  - 2.7.2 any other supervisory authority which is 'concerned' by the Processing of Workforce Data because:
    - a. Citi is established in the country or territory in which that supervisory authority is established,
    - b. Workers living in the country or territory of that supervisory authority are likely to be affected by the Transfer of Workforce Data, or
    - c. it has received a complaint from a Worker relating to processing of Transferred Workforce Data.
- 2.8 “E-Privacy Directive” means Directive 2002/58/EC, which introduces supplemental protections for personal data in the communications and on- line sectors and any amendment to, or replacements of, such Directive from time to time.
- 2.9 “European Data Protection Law” means, to the extent applicable, the GDPR, E-Privacy Directive, national laws in the European Economic Area that implement or supplement the foregoing, equivalent laws applicable in Switzerland, Monaco and Jersey including the Swiss Federal Data Protection Act, Monaco Law No 1.565 of 3 December 2024 on the Protection of Personal Data and the Data Protection (Jersey) Law 2018 and any replacements or amendments to any of the foregoing from time to time.
- 2.10 “GDPR” means the Regulation (EU) 2016/679 (the General Data Protection Regulation) and any amendment to, or replacements of such Regulation from time to time.
- 2.11 “HR Representative” means the HR Partner assigned to each Worker, other than Non-Employees which is easily found in each employee’s Citi Global Directory entry on Citi’s intranet.
- 2.12 “HR Self-Service System” means the electronic system used by Workers to input certain personal data about themselves, such as personal contact information, CV information and/or self-assessment of job performance.
- 2.13 “In-Business Privacy Officer” more commonly referred to as an “IBPO” means Privacy Officer assigned to a business and/or function within Citi, a complete list of these officers is accessible on Citi’s intranet.
- 2.14 “Information Security Standards” means the latest available version of Citi’s Cyber and Information Security Policy.
- 2.15 “Internal Audit” means the Citi Internal Audit division.

- 2.16 “Non-Employee” means any individual entered into Citi’s Non-Employee Management System (NEMS), or any replacement system. NEMS contains information about persons that require access to Citi premises and/or systems and includes, but is not limited to, contractors, agency workers, consultants, external service providers, and agents that have access to premises and/or systems.
- 2.17 “Non-Employee Staffing Office” means the global non-employee utility that provides qualified recruitment through utilization of third-party suppliers, and on/off-boarding to ensure all non-employees are screened and cleared based on local country due diligence requirements. For time and material/staff augmentation, the Citi business contact is responsible for worker activities and approval of timesheets and invoices. For all other work, the Citi business activity owner is responsible for the management (in accordance with the Third-Party Management Policy and Standard) of the supplier relationship and/or agreement associated with that non-employee and to whom the non-employee should raise any queries or complaints with respect to this Procedure.
- 2.18 “Participating Countries” means the countries identified in Appendix 3.
- 2.19 “Principal Contact” means the HR Privacy Compliance Manager.
- 2.20 “Procedure” means this privacy procedure for Transferred Workforce Data.
- 2.21 “Processing” means any action that is performed on Workforce Data, such as obtaining, recording, organising, storing, modifying, using, disclosing, deleting, or transferring such data, and “Process” or “Processes” shall be construed accordingly.
- 2.22 “Relevant Countries” means:
- 2.22.1 as regards Transfers from the European Economic Area or Jersey, all countries other than any country within the European Economic Area or any country or territory in respect of which the European Commission, in accordance with Directive 95/46/EC, or the GDPR, has declared there is an adequate level of protection for personal data, provided and only for so long as such decision of the European Commission remains in force and the recipient of the personal data satisfies any conditions relevant to the applicability of that decision;
  - 2.22.2 as regards Transfers from Switzerland, all countries other than any country within the European Economic Area or any other country or territory with laws that provide an adequate level of data protection either according to the list published by the Federal Data Protection and Information Commissioner or, after the coming into force of the revised Federal Act on Data Protection, according to a binding adequacy decision by the Federal Council. For the avoidance of doubt, ‘Relevant Countries’ for the purpose of Transfers from the European Economic Area or Jersey or for the purpose of Transfers from Monaco may differ for Transfers from Switzerland. For example, as of the effective date of this Procedure Japan and the Republic of Korea are not ‘Relevant Countries’ for the purpose of Transfers from the European Economic Area or Jersey since the European Commission has declared there is an adequate level of protection for personal data in Japan and the Republic of Korea by Implementing Decisions (EU) 2019/419 and C(2021) 9316 of the European Commission, but Japan and the Republic of

Korea currently are both to be considered 'Relevant Countries' for Transfers from Switzerland;

- 2.22.3 as regards Transfers from Monaco, all countries other than any country within the European Economic Area or any other country or territory with laws that provide an adequate level of data protection according to the list published by the Monaco government in a ministerial order. For the avoidance of doubt, 'Relevant Countries' for the purpose of Transfers from the European Economic Area or Jersey or for the purpose of Transfers from Switzerland may differ for Transfers from Monaco.
- 2.23 "Relevant Inquiry" means an investigation or inquiry by a Data Protection Authority in relation to Workforce Data, which has been transferred by a Citi entity that is subject to that Data Protection Authority's jurisdiction.
- 2.24 "Third-Party Management Policy" means Citi's policy for the selection and management of suppliers to Citi entities.
- 2.25 "Third Party" has the meaning set out in Citi's Information Security Standards.
- 2.26 "Transfer" and its cognates, means transferring, or making available, Workforce Data to another Citi entity located in a Relevant Country by any means in reliance on the Binding Corporate Rules.
- 2.27 "Vendor Manager" means the business contact of a Non-employee, which person is responsible for the management (in accordance with the Third-Party Management Policy) of the supplier relationship and/or agreement associated with that Non-employee and to whom the Non-employee should raise any queries or complaints with respect to this Procedure. This is sometimes referred to as the "Non-employee Staffing Office".
- 2.28 "Worker" means any current or former employee, officer, director, or Non-employee engaged by Citi and any individual applying to become a Worker and any dependents or other individuals, whose details have been given to Citi for workforce management reasons (for example, for emergency contact purposes) and in respect of whom Citi processes Transferred Workforce Data. For the avoidance of doubt, the use of the term "Worker" in this Procedure will not be construed to imply or create an employment or contractual relationship with Citi where one does not already exist either as a result of an employment contract or as a matter of law.
- 2.29 "Workforce Data" means any personal data (as that term is defined under European Data Protection Law) relating to a Worker, unless the data is rendered anonymous so that an individual is unidentifiable.

### **3 USES OF TRANSFERRED EUROPEAN WORKFORCE DATA**

- 3.1 Citi may Process information about Workers in connection with their employment, obtaining or providing services or for day-to-day business activities. These activities include among other things communicating with Workers, maintaining continuity of business, administering compensation, benefits, talent and expenses, and managing its workforce, business and operations (for example, by allocating work,

providing IT, and ensuring a safe and secure place to work) and in connection with legal compliance, regulatory and investigative purposes (including disclosure of such information in response to, or in connection with, legal process or litigation).

- 3.2 Because Citi is a global organisation, Workforce Data may be Transferred to and Processed by other Citi entities, for example where IT services are performed by one or more Citi entities on behalf of others. In addition, Citi may disclose Transferred Workforce Data to third parties in accordance with this Procedure, for example for business or operational purposes, where required or permitted by law, or in connection with corporate activity, including mergers, sales or reorganisations.
- 3.3 Citi will Process Transferred Workforce Data for specific, explicit and legitimate purposes. Citi will not Process Transferred Workforce Data in a way that is incompatible with these purposes.
- 3.4 Citi will ensure that transfers of Transferred Workforce Data to any public authority are not massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

<b>4 DATA MANAGEMENT</b>
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- 4.1 Citi will:
  - 4.1.1 Process Transferred Workforce Data, which is accurate, up to date, adequate and relevant, all based on information provided by the Worker and all as may be necessary for the purposes for which the data is Processed; and
  - 4.1.2 Only Process Transferred Workforce Data and retain Transferred Workforce Data in a form which permits the identification of the Workers to which the Transferred Workforce Data relate for as long as is reasonably necessary for the purposes for which such data are Processed.

<b>5 LEGAL BASIS FOR PROCESSING TRANSFERRED EUROPEAN WORKFORCE DATA</b>
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- 5.1 Citi will Process Transferred Workforce Data in accordance with one of the conditions for Processing personal data set out in the GDPR (or in a similar European Data Protection Law, as applicable), and in particular, those conditions set out at section 5.3 below. In the case of Transferred Workforce Data that is also a Special Category of Personal Data, it will also Process such data in accordance with the additional conditions for processing Special Categories of Personal Data set out in the GDPR (or in a similar European Data Protection Law, as applicable), and in particular, those conditions set out at section 5.4 below. In the case of Transferred Workforce Data that relates to criminal convictions and offences or related security measures, it will Process such data in accordance with the additional conditions for processing such personal data set out in the GDPR (or in

a similar European Data Protection Law, as applicable).

- 5.2 “Special Categories of Personal Data” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation, as well as other sensitive data according to European Data Protection Law, as applicable.
- 5.3 Citi relies on the following legal bases to Process Transferred Workforce Data under the GDPR:
- 5.3.1 Consent – Workers have given consent to the Processing;
  - 5.3.2 Contract Necessity – The Processing is necessary for the performance of Workers’ employment contracts, or to take steps at the request of Workers prior to entering into a contract with Workers;
  - 5.3.3 Legal Obligations – the Processing is necessary to comply with Citi’s legal obligations;
  - 5.3.4 Legitimate Interests – The Processing is necessary for the purposes of legitimate interests pursued by Citi or by a third party, where those interests are not outweighed by the interests or fundamental rights and freedoms of the relevant Workers. The legitimate interests pursued by Citi are:
    - a) conducting Citi’s business in a responsible and commercially prudent manner;
    - b) protecting Citi’s business, reputation, resources and equipment;
    - c) operating a content monitoring program to detect proprietary or confidential information or personal data that is being sent out in breach of applicable policies and requirements and or applicable laws and regulations from time to time;
    - d) pursuing Citi’s corporate and social responsibility objectives;
    - e) measuring, monitoring and improving operational performance;
    - f) implementing and maintaining responsible employment practices;
    - g) operating in a global model of designated hubs and centres of excellence and engaging professional third parties to perform certain activities on behalf of Citi;
    - h) identifying and managing risks;
    - i) understanding the effectiveness of work attendance and whether employees are meeting office attendance expectations and contractual obligations; and
    - j) enabling managers, particularly those who are not in the same location (site or country) as all their direct and matrix reports, to use building entry data as an efficient, accurate and reliable basis to start discussions around office attendance; and prompting and informing discussions with employees about office attendance, reinforcing expectations and would support any subsequent performance/attendance management

process as appropriate, up to and including termination.

- 5.4 Citi relies on the following additional conditions to Process Transferred Workforce Data that is also a Special Category of Personal Data under the GDPR:
- 5.4.1 Explicit Consent - Workers have given explicit consent to the Processing;
  - 5.4.2 Employment or Social Security Law Necessity – The Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Citi or of a Worker in the field of employment and social security and social protection law;
  - 5.4.3 Legal Claims Necessity – The Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; and
  - 5.4.4 Preventative or Occupational Medicine Necessity – The Processing is necessary for the purposes of preventive or occupational medicine and for the assessment of the working capacity of the Worker.

## **6 NOTICE**

- 6.1 Citi will provide Workers with information about the way Citi processes Transferred Workforce Data. This information may be provided by a variety of means, such as in this Procedure, employment handbooks, contracts, privacy guidelines and on Citi's intranet.
- 6.2 In some situations, it may not be possible or would involve a disproportionate effort to tell the Worker about specific processing activities carried out by Citi. These instances are rare. Unless prohibited by law, or involving a disproportionate effort to do so, Citi will always endeavor to provide information to the Worker on the processing of Transferred Workforce Data using the methods described in 6.1 above.
- 6.3 Subject to 6.2 above, Citi will provide such information to Workers as is necessary so that Citi's Processing is compliant with this Procedure. Notice provided by Citi will include information as required by transparency requirements set out in the GDPR (or in a similar European Data Protection Law, as applicable).

## **7 RIGHTS IN RELATION TO TRANSFERRED EUROPEAN WORKFORCE DATA**

- 7.1 A Worker may obtain confirmation as to whether or not Transferred Workforce Data concerning them are being processed, and where that is the case, access to the Transferred Workforce Data, including a copy of the Transferred Workforce Data concerning them undergoing Processing, and the following information:
- the purposes of the Processing;
  - the categories of the Transferred Workforce Data concerned;
  - the recipients or categories of recipients to whom the Transferred Workforce

Data have been or will be disclosed, in particular recipients in Relevant Countries;

- where possible, the envisaged period for which the Transferred Workforce Data will be stored, or if not possible, the criteria used to determine that period;
- the existence of the right to request from Citi rectification or erasure of Transferred Workforce Data or restriction of Processing of Transferred Workforce Data concerning the Worker or to object to such Processing;
- the right to lodge a complaint with a supervisory authority;
- where Transferred Workforce Data is not collected from the Worker, any available information as to their source; and
- the existence of decision making based solely on Automated Processing, including profiling, which produces legal effects or otherwise similarly affects the relevant Worker (commonly referred to as 'automated decision-making') and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Worker.

7.2 Where requests for access are manifestly unfounded or excessive, in particular because of their repetitive character, Citi may either (a) charge a reasonable fee taking into account the administrative costs of providing the access; or (b) refuse to act on the request. Citi bears the burden of demonstrating the manifestly unfounded or excessive character of such requests. Requests for access should be made by raising a ticket on The HR Help Centre (in the case of current Workers) or email (in the case of former Workers or individuals who applied/are applying to become a Worker) or email (in case of Non-employees). Concerns from Non-employees should be directed to their employer. Inquiries from suppliers should be directed to the Non-employee Staffing Office at [Supplier\\_Care@citi.com](mailto:Supplier_Care@citi.com).

7.3 Each Worker has a responsibility to provide accurate Workforce Data about themselves and to inform Citi of any changes to their personal information (e.g., new home address, telephone and/or email contact information or change of name) using the HR Self-Service System or other tools that may be made available. Each Worker may request that Citi correct, erase, block or suppress Transferred Workforce Data that relates to themselves and which is inaccurate or incomplete. Such requests should be made by raising a ticket on The HR Help Centre (in the case of current Workers) or email (in the case of former Workers or individuals who applied/are applying to become a Worker) or email (in case of non employees\_ . Concerns from Non-employee should be directed to their employer. Inquiries from suppliers should be directed to the Non-employee Staffing Office at [Supplier\\_Care@citi.com](mailto:Supplier_Care@citi.com).

7.4 Workers may exercise the following rights in relation to Transferred Workforce Data relating to them subject to any relevant exemptions provided for under European Data Protection Law, by contacting their HR Representative or Non-employee Staffing Office/ Vendor Manager. Workers may make a request to confirm details of their HR Representative via the Citi HR Help Centre or Non-employee Staffing Office (in the case of Non-employees), as applicable by clicking on the hyperlinks embedded above:

- Right to rectification: the right to obtain without undue delay the rectification of

inaccurate Transferred Workforce Data concerning them. Taking into account the purposes of the Processing, Workers have the right to have incomplete Transferred Workforce Data completed, including by means of providing a supplementary statement.

- Right to erasure/deletion: the right to obtain the erasure/deletion of Transferred Workforce Data concerning them without undue delay where one of the following grounds applies:
  - Transferred Workforce Data are no longer necessary in relation to the purposes for which they were collected or otherwise Processed;
  - the Transferred Workforce Data was Processed based on the Worker's consent, the Worker withdraws their consent and there is no other legal ground for the Processing;
  - the Worker objects to Processing which is based on the Processing being necessary for the purposes of legitimate interests pursued by Citi or a third party and there are no overriding legitimate grounds for the Processing to continue;
  - the Worker objects to the Processing which involves the use of their Personal Data for direct marketing purposes;
  - the Transferred Workforce Data have been unlawfully Processed;
  - the Transferred Workforce Data must be erased for compliance with a legal obligation applicable to Citi.
- Right to restriction: the right to obtain the restriction of Processing where one of the following applies:
  - the accuracy of the Transferred Workforce Data is contested by the Worker, for a period enabling Citi to verify the accuracy of the Transferred Workforce Data;
  - the Processing is unlawful and the Worker opposes the erasure of the Transferred Workforce Data and requests the restriction of their use instead;
  - Citi no longer needs the Transferred Workforce Data for the purposes of the Processing, but they are required by the Worker for the establishment, exercise or defence of legal claims;
  - the Worker has objected to the Processing, pending the verification whether the legitimate grounds of Citi override the objection of the Worker.
- Right to portability: the right to receive the Transferred Workforce Data concerning them, which they provided to Citi, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Citi, where:
  - the Processing is based on the Worker's consent or that it is necessary for the performance of a contract with the Worker; and
  - the Processing is carried out by automated means.

- Right to object: the right to object, on grounds relating to the Worker's particular situation, at any time to Processing of Transferred Workforce Data concerning them which is based on such Processing being necessary for purposes of legitimate interests pursued by Citi or a third party, including profiling based on those provisions. In the event of such an objection, Citi will not continue to Process the Transferred Workforce Data unless Citi demonstrates compelling legitimate grounds for the Processing which override the interests, rights and freedoms of the Worker or where continued Processed is necessary for the establishment, exercise or defence of legal claims.
- Right to request note of contest: For Workforce Data protected by the Swiss Federal Act on Data Protection, Workers may additionally request that a note of contest is added in case neither the accuracy nor the inaccuracy of the Workforce Data in question can be established.

7.5 Citi shall communicate any rectification or erasure of Transferred Workforce Data or restriction of Processing carried out as a result of a Worker exercising their rights to rectification, erasure or restriction to each recipient to whom the Transferred Workforce Data have been disclosed, unless this proves impossible or involves disproportionate effort. Citi shall inform the Worker about those recipients if the Worker requests it.

## **8 AUTOMATED DECISIONS**

8.1 Citi will not take decisions about Workers solely on the basis of automated processing of Workforce Data (i.e. no human involvement in the decision), including profiling, which produce legal effects, or have similarly significant effects unless such decision taking is in accordance with European Data Protection Law.

## **9 DIRECT MARKETING COMMUNICATIONS**

9.1 Citi may choose to communicate with Workers in a number of different ways. Workers may object to Citi Processing Transferred Workforce Data relating to them for direct marketing purposes by contacting HR or the Non-employee Staffing Office (for Non-employees) as appropriate.

## **10 SECURITY**

10.1 Citi will implement appropriate technical and organisational measures to protect Transferred Workforce Data against unlawful forms of Processing, accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the Processing involves the transmission of data over a network.

10.2 These measures will provide a level of security that is appropriate to the nature of

the Transferred Workforce Data and the type of Processing (for example, information classified in Citi's Information Classification Standard as "Internal PII", "Confidential PII" or "Sensitive PII" that will attract higher protection), taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

- 10.3 Citi will notify any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Transferred Workforce Data transmitted, stored or otherwise Processed to the relevant supervisory authority without undue delay and within 72 hours where feasible after becoming aware of it and to Workers without undue delay where the breach is likely to result in a high risk to their rights and freedoms and also notify Citibank Europe plc, the relevant In-Business Privacy Officer and any other relevant Data Controller through the process set out in Citi's Security Incident Review process (SIRT) of such breach of security without undue delay.
- 10.4 Citi will document any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Transferred Workforce Data transmitted, stored or otherwise Processed (comprising the facts relating to the breach, its effects and the remedial action taken) and the documentation will be made available to Data Protection Authorities on request.
- 10.5 Further information about Citi's security incident reporting process and the Security Incident Response Team (SIRT) can be found on the Intranet.

## **11 TRANSFERS OF EUROPEAN WORKFORCE DATA OUTSIDE CITI**

- 11.1 Citi will comply with:
  - 11.1.1 Citi policies and standards that are also applicable to the transfer of Workforce Data to Third Parties (including but not limited to Citi's Third Party Management Policy, Information Security Standards); and
  - 11.1.2 the Citi Internal Third Party Management Standards to Transferred Workforce Data, set out in Appendix 1 to this Procedure.

## **12 TRAINING**

- 12.1 Citi will provide appropriate and up-to-date training on the obligations of this Procedure to all Human Resources Workers who have material or meaningful access to Transferred Workforce Data, in addition to Citi's Information Security and/or Global Confidentiality and Data Protection Policy Compliance Programme. Training will also be provided to individuals who handle complaints from Workers in relation to Transferred Workforce Data. Training has been approved by Citi's senior management. Training should cover, among other things, procedures of managing requests for access to personal data by public authorities.
- 12.2 Citi will also provide yearly global privacy and records management training. Citi will

require new Workers to undergo this training in accordance with the timelines of the Worker's onboarding plan.

## **13 ACCOUNTABILITY**

- 13.1 Each Citi entity will be responsible for, and demonstrate compliance with, the Binding Corporate Rules.
- 13.2 When acting as a Data Controller, Citi will implement technical and organisational measures to show that data compliance measures have been integrated into Transferred Workforce Data processing activities, (products and services) (data protection by design and by default).
- 13.3 A data privacy impact assessment ("DPIA") is a discrete audit conducted on a specific area of an organisation's operations to identify and minimise non-compliance risks. When acting as a Controller, Citi will run a DPIA on any "high risk" processing activity (measured by reference to the risk of infringing an individual's rights and freedoms) in relation to the Processing of Transferred Workforce Data before it is commenced in accordance with European Data Protection Law. DPIAs will include a description of the processing activities and their purpose and an assessment of the need for and proportionality of the processing, the risks arising and measures adopted to mitigate those risks, in particular safeguards and security measures to protect Transferred Workforce Data and comply with European Data Protection Law.
- 13.4 Where a DPIA in relation to Transferred Workforce Data indicates that the Processing would result in a high risk in the absence of measures taken by the Data Controller to mitigate the risk, the Data Protection Authority, prior to Processing, will be consulted in accordance with the requirements of European Data Protection Law.
- 13.5 Citi will keep a record of its Transferred Workforce Data processing activities (including the type of Workforce Data Processed and the purposes for which it is used) in accordance with the requirements of European Data Protection Law. In particular, the record shall contain all of the following information:
  - 13.5.1 the name and contact details of the Data Controller and, where applicable, the joint Data Controller, the Data Controller's representative and the GDPR DPO (as referred to below);
  - 13.5.2 the purposes of the Processing;
  - 13.5.3 the fact that the data subject is a Worker;
  - 13.5.4 the categories of the Transferred Workforce Data;
  - 13.5.5 the categories of recipients to whom the Transferred Workforce Data have been or will be disclosed including recipients in third countries or international organisations;
  - 13.5.6 the transfers of Transferred Workforce Data, including the identification of that third country or international organisation, and where the GDPR (or a similar European Data Protection Law, as applicable) requires specific suitable safeguards to be provided, the documentation of such suitable

safeguards;

13.5.7 where possible, the envisaged time limits for erasure of the different categories of Transferred Workforce Data; and

13.5.8 where possible, a general description of the technical and organisational security measures implemented to ensure a level of security appropriate to the risk for the rights and freedoms of the relevant Workers.

13.6 In line with the GDPR, Citi has appointed a Data Protection Officer pursuant to the GDPR (the GDPR DPO), selected by reference to their professional qualities and expert knowledge. The GDPR DPO is a part of Citi's Independent Compliance Risk Management and provides oversight on compliance with the Binding Corporate Rules. The GDPR DPO shall report to the highest management level. In addition, the GDPR DPO can inform the highest management level if any questions or problems arise during the performance of their duties. The GDPR DPO also checks and challenges internal functions, including Human Resources, on matters impacting the level of compliance with the Binding Corporate Rules. This is facilitated by various organizational measures, including a quarterly governance forum and privacy impact assessments. The DPO should not have any tasks that could result in conflict of interests. The DPO should not be in charge of carrying out data protection impact assessments, neither should they be in charge of carrying out the Binding Corporate Rules audits if such situations can result in a conflict of interests. However, the DPO can play a very important and useful role in assisting Data Exporters and Data Importers, and the advice of the DPO should be sought for such tasks.

13.7 The responsibility for this Procedure, including the management of the obligations set out in this Procedure, sits with the HR function as explained in Section 15.1 because the Binding Corporate Rules concern Workforce Data, for which the HR function has operational oversight. The GDPR DPO is responsible for monitoring the Binding Corporate Rules through Citi's existing compliance framework (as set out in section 13.7). The GDPR DPO may be directly contacted by emailing [GDPRDPO@citi.com](mailto:GDPRDPO@citi.com). [In addition, Citi has appointed a Swiss Data Protection Advisor for the purposes of the Swiss Federal Data Protection Act, who can be directly contacted by emailing to [swissdataprotectionadvisor@citi.com](mailto:swissdataprotectionadvisor@citi.com).]

13.8 For the purposes of complying with the obligations of this Procedure, Citi will use a combination of

13.8.1 the existing Citi compliance framework for Citi's European Data Protection Law compliance obligations where such obligations are common to those set out in this Procedure; and

13.8.2 Citi's Binding Corporate Rules-specific compliance procedure for such Citi's obligations in this Procedure which are in addition to Citi's European Data Protection Law obligations.

## **14 AUDIT PROVISIONS**

14.1 Internal Audit decides the audit programme. Internal Audit are guaranteed

independence as to the performance of their duties related to these audits. Compliance with all aspects of the Binding Corporate Rules (for instance, applications, IT systems, databases that process personal data, or onward transfers, decisions taken as regards mandatory requirements under national laws that conflict with the Binding Corporate Rules, review of the contractual terms used for the transfers out of the European Citi Entities to controllers or processors of data, corrective actions, etc.), will be subject to regular audits conducted in line with the annual risk assessment every 3 years, and if there are indications of non-compliance to ensure verification of compliance with the Binding Corporate Rules by Internal Audit. Where issues are identified by Internal Audit, Citi shall resolve these in a timely manner and any corrective actions taken will be reviewed by Internal Audit. In addition to the regular audits set out above, the GDPR DPO can request additional ad-hoc specific audits in respect of compliance with the Binding Corporate Rules.

- 14.2 It is not mandatory to monitor all aspects of the Binding Corporate Rules each time a Data Exporter or Data Importer is audited, as long as all aspects of the Binding Corporate Rules are monitored at appropriate regular intervals for that Data Exporter or Data Importer.
- 14.3 Rights for Data Protection Authorities in respect of audits are set out in Appendix 2.
- 14.4 Audit reports will be provided to the board of the relevant Data Exporter, to Citi's senior management, including where appropriate to the board of the ultimate parent company of the relevant Data Exporter, and to the GDPR DPO. Audit results and key issues will also be reported to the Risk and Audit Committee of the Citi Board of Directors and to the HR Chief Data Officer.

## **15 COMPLIANCE**

- 15.1 The HR Chief Data Officer is responsible for promoting compliance with this Procedure and will implement the Procedure, by training and making the Procedure available as described in this Procedure and otherwise so that the Procedure is applied throughout Citi. The HR Chief Data Officer will ensure that there is a nominated individual in the Participating Countries, who can act as an initial point of contact for Data Protection Authorities, in the event that they have Relevant Inquiries and who will assist in managing the obligations set out in this Procedure, including Section 17.
- 15.2 Citi's personnel (including employees and Non-employees) must take appropriate measures to observe the provisions of this Procedure. Non-compliance with this Procedure by a member of Citi's personnel may result, in the case of Citi employees, in disciplinary sanctions against the employee, including termination or dismissal, as permitted by local law or, in the case of Non-employees, in termination (in whole or in part) of the agreement relevant to the services provided by that Non-employee.
- 15.3 Any complaints that this Procedure may have been violated will be investigated by a person who has a suitable level of independence from the Worker. If a Worker has a concern that Citi has Processed Transferred Workforce Data relating to them in violation of this Procedure, or that this Procedure may have been violated in some other way, they may report this to HR via the [Citi HR Help Centre](#), [email](#) or to the 'HR

Privacy Compliance Manager' at Citi – Human Resource, 1 North Wall Quay, Dublin, D1, Ireland, or [Non-employee Staffing Office](#) (for Non-employees), as appropriate, who will then refer the complaint to an independent complaints team tasked with the responsibility of dealing with alleged violations of this Procedure. Workers can also use the escalation channels following the Global escalation Procedure. HR, the Principal Contact, or Non-employee Staffing Office will manage the investigation, obtaining input from relevant businesses or functions within Citi such as O&T, Compliance and Legal, and they will ensure that the Worker is kept informed of the progress of the investigation including providing them with details of the outcome of that investigation. Citi will provide information on actions taken to the Worker without undue delay and in any event within one month from the date the complaint is notified to Citi. Taking into account the complexity and number of the requests, that one month period may be extended at maximum by two further months, in which case the Worker should be informed accordingly. Where the complaint is considered as justified, Citi shall carry out a root cause analysis and appropriate remediation actions shall be completed. If Citi rejects a complaint for any reason, then a Worker may seek other remedies, as described in Section 15.4 below.

- 15.4 The rights that Workers have to enforce Citi's Binding Corporate Rules and to seek remedies in relation to Transferred Workforce Data, and the obligations that Citi has if Transferred Workforce Data is Processed in violation of this Procedure, are set out in the Third Party Beneficiary Deed, which Citi will make readily available, e.g. via the Citi intranet, or upon request. These include rights for Workers to complain to a competent Data Protection Authority and to bring an action before a competent court to enforce Citi's Binding Corporate Rules. As set out above Workers may contact their HR Representative via the Citi HR Help Centre or the 'HR Privacy Compliance Manager' at Citi – Human Resource, 1 North Wall Quay, Dublin, D1, Ireland, or alternatively for Non- employees their Non-employee Staffing Office/ Vendor Manager to make a complaint or submit privacy related queries under this Procedure. Nothing in the Third-Party Beneficiary Deed restricts rights that Workers would have under European Data Protection Law independently of the Third Party Beneficiary Deed.
- 15.5 The purpose of this Procedure is as stated in Section 1.1 above. This Procedure is not intended to create any rights for Workers that are not contemplated in European Data Protection Law. For example, this Procedure does not (expressly or impliedly) grant any rights of employment with a Citi entity to a Non-employee. Under no circumstances should this Procedure be interpreted as (i) conferring any rights or benefits on a Worker, which they would not otherwise have pursuant to European Data Protection Law; and/or (ii) creating any additional liability for Citi (whether in contract, tort (including negligence) or howsoever arising) to Workers other than as may be expressed in the Third Party Beneficiary Deed or as may be otherwise owed pursuant to European Data Protection Law.
- 15.6 Further, this Procedure is not intended to create any additional liability for Citi (whether in contract, tort (including negligence) or howsoever arising) to, or any additional rights for, employees and/or Non-employees who are not Workers.
- 15.7 No Transfer shall be made to a Citi entity unless such Citi entity is effectively bound by the Binding Corporate Rules and can deliver compliance with the Binding

## Corporate Rules.

- 15.8 Each Data Importer shall promptly inform the relevant Data Exporter if it is unable to comply with the Binding Corporate Rules, for whatever reason.
- 15.9 Where a Data Importer is in breach of the Binding Corporate Rules or unable to comply with them, the relevant Data Exporter shall suspend the Transfer.
- 15.10 Each Data Importer should, at the choice of the relevant Data Exporter, immediately return or delete the Transferred Workforce Data that has been transferred under the Binding Corporate Rules in its entirety, including any copies thereof, where:
- 15.10.1 the Data Exporter has suspended the transfer, and compliance with the Binding Corporate Rules is not restored within a reasonable time, and in any event within one month of suspension; or
  - 15.10.2 the Data Importer is in substantial or persistent breach of the Binding Corporate Rules; or
  - 15.10.3 the Data Importer fails to comply with a binding decision of a competent court or competent Data Protection Authority regarding its obligations under the Binding Corporate Rules.
- 15.11 A Data Importer shall, when it is required to return or delete Transferred Workforce Data pursuant to Section 15.10:
- 15.12 do so, except to the extent that local laws applicable to the Data Importer prohibit the return or deletion of the Transferred Workforce Data, in which case the Data Importer shall continue to ensure compliance with the Binding Corporate Rules in respect of such Transferred Workforce Data and only process it to the extent and for as long as required under that local law;
- 15.13 subject to Section 15.11.1, do so and:
- a) continue to process the Transferred Workforce Data in accordance with the Binding Corporate Rules until it has done so; and
  - b) certify in writing to the relevant Data Exporter when it has done so.

## **16 CO-OPERATION WITH REGULATORS**

- 16.1 All Citi entities will co-operate and assist each other to respond to any Relevant Inquiry from a Data Protection Authority and will comply with Appendix 2.

## **17 UPDATES TO AND AVAILABILITY OF THIS PROCEDURE**

- 17.1 Citi will make this Procedure and the Third Party Beneficiary Deed and any subsequent amendments to either of them readily available to Workers in written or soft copy form, e.g. via the Citi intranet and via a link within the European Addendum to the Citi Careers Privacy Notice For Job Applicants.
- 17.2 Citi will:
- 17.2.1 maintain an up-to-date list of all changes to this Procedure and of all Citi

entities that must comply with this Procedure and provide the necessary information to Workers, and, upon request, to Data Protection Authorities on a timely basis;

- 17.2.2 notify all Citi entities that must comply with this Procedure of any changes to this Procedure, including any changes to the list of Citi entities that must comply with this Procedure;
  - 17.2.3 notify Workers of any substantial changes to the Procedure without undue delay;
  - 17.2.4 communicate to the Data Protection Authorities in advance, via the lead Data Protection Authority, where a modification to the Binding Corporate Rules would possibly be detrimental to the level of protection offered by the Binding Corporate Rules or significantly affect the Binding Corporate Rules (i.e. changes to the binding character), together with a brief explanation of the reasons for the update;
  - 17.2.5 report any other changes to the Binding Corporate Rules, or to the Citi entities subject to the Binding Corporate Rules, without undue delay to the Data Protection Authorities (via the lead Data Protection Authority) once per year or on request, together with a brief explanation of the changes;
  - 17.2.6 notify the Data Protection Authorities once a year in instances where no changes have been made to the Binding Corporate Rules and each annual update or notification shall include a renewed confirmation that each Citi entity responsible for redress in the event of a breach of the Binding Corporate Rules has sufficient assets to pay compensation for damages.
- 17.3 Where a new Citi entity is established (for example, as a result of a merger or acquisition), Citi will not Transfer Workforce Data in reliance on this Procedure to that new entity until that entity is bound by this Procedure.

## **18 RELATIONSHIP WITH LOCAL LAWS**

- 18.1 Citi recognises that local laws may apply to Workforce Data. Where local law requires more protection for Workforce Data than is provided for by this Procedure, Citi will comply with local law, which will take precedence over this Procedure.

## **19 ASSESSMENT OF LEVEL OF PROTECTION AND OBLIGATIONS IN CASE OF GOVERNMENT ACCESS REQUESTS**

- 19.1 Citi recognizes that each Citi entity located in the European Economic Area, Switzerland, Monaco or Jersey that Transfers Workforce Data to a Relevant Country pursuant to the Binding Corporate Rules:
- 19.1.1 is obliged under European Data Protection Law to ensure that there are appropriate safeguards in place and that enforceable data subject rights and effective legal remedies for data subjects are available to Workers, so

that the level of protection for Workers in respect of their Transferred Workforce Data is essentially equivalent to that guaranteed by European Data Protection Law;

19.1.2 in connection with 19.1.1, is required to conduct a documented assessment in respect of the circumstances of such a Transfer, which takes into account among other things the provisions of the Binding Corporate Rules and the laws and practices of any Relevant Country to which the Workforce Data is Transferred, including those requiring the disclosure of data to public authorities or authorising access by such authorities, which are relevant to the Transfer, to determine the overall level of protection for Workers in respect of their Transferred Workforce Data. This is based on the understanding that laws and practices that respect the essence of the fundamental rights and freedoms, and do not exceed what is necessary and proportionate in a democratic society to safeguard one of the objectives recognized in the GDPR (or in a similar European Data Protection Law, as applicable), such as national security, defence or public security, are not in contradiction with the Binding Corporate Rules; and

19.1.3 if such assessment indicates that compliance by Citi with the Binding Corporate Rules cannot, in and of itself, ensure the level of protection required under European Data Protection Law due to any such laws or practices in a Relevant Country, is required either (a) to adopt supplementary measures that ensure compliance with that level of protection; or (b) to suspend, cease or not engage in the Transfer.

19.2 Citi will conduct appropriate documented assessments, review such assessments periodically and, where necessary, implement supplementary measures or suspend, cease or not engage in a Transfer, as applicable, to the extent necessary to comply with European Data Protection Law. Where applicable, Citi will inform the GDPR DPO of the requirement to implement supplementary measures, involve the GDPR DPO in their selection and document the supplementary measures selected and implemented.

19.3 In respect of any documented assessment referred to in this section 19:

19.3.1 any Citi entity(ies) located in the European Economic Area, Switzerland, Monaco or Jersey involved in the Transfer, will notify Citi's Operations and Technology Business Risk and Control (OTBRC) Cross Border Data Clearance (CBDC) Utility team, (collectively referred to as the "CBDC team"), through Citi's existing CBDC submission process. Citi entity(ies) have an obligation to engage the CBDC team in advance of all data transfer requests. The CBDC team supports Citi businesses to address compliance with country requirements relating to data transfers, privacy and outsourcing laws governing the transfer of data outside the country of collection, and will be informed of and involved in conducting the assessment;

19.3.2 the Citi entity which conducted the assessment will inform all other Citi entities required to comply with this Procedure (see Appendix 4) of the assessment and of its results, so that:

- a) if the assessment identifies any supplementary measures as being required in connection with the relevant Transfer, such supplementary measures can be implemented uniformly in respect of any other Transfer between Citi entities pursuant to the Binding Corporate Rules that is substantially the same as the Transfer which was the subject of the assessment; or
  - b) if the assessment indicates that the relevant Transfer should not take place or should be suspended or ceased, GDPR DPO will be informed and any other Transfer between Citi entities pursuant to the Binding Corporate Rules that is substantially the same as the Transfer which was the subject of the assessment may be suspended or ceased;
- 19.3.3 due account shall be taken, in particular, of the following elements when conducting the documented assessment:
- a) the specific circumstances of the Transfers or set of transfers, and of any envisaged onward Transfers within the same Relevant Country or to another Relevant Country, including:
    - purposes for which the Workforce Data are Transferred and Processed;
    - types of entities involved in the Processing;
    - economic sector in which the Transfer or set of Transfers occur;
    - categories and format of the Transferred Workforce Data;
    - location of the Processing, including storage; and
    - transmission channels used.
  - b) the laws and practices of the Relevant Country relevant in light of the circumstances of the Transfer, including those requiring to disclose to public authorities or authorizing access by such authorities and those providing for access to the Transferred Workforce Data during the transit between the Participating Country and the Relevant Country, as well as the applicable limitations and safeguards.
  - c) any relevant contractual, technical or organizational safeguards put in place to supplement the safeguards under the Binding Corporate Rules during the transmission and to the Processing of the Transferred Workforce Data in the Relevant Country.
- 19.3.4 Citi will make the documented assessment and, where applicable, the supplementary measures selected and implemented, available to a Data Protection Authority on request.
- 19.3.5 Each Data Importer will promptly notify the relevant Data Exporter (which is referred to as the 'Relevant Exporting Entity' in the Third Party Beneficiary Deed) and the GDPR DPO if it has reasons to believe that it is or has become subject to laws or practices that would prevent it from fulfilling its obligations under the Binding Corporate Rules, including following a change in the laws of the Relevant Country or a

measure (such as a disclosure request). Upon verification of such notification and where the Data Exporter has reasons to believe that a Data Importer can no longer fulfil its obligations under the Binding Corporate Rules, the Data Exporter will promptly identify supplementary measures to be adopted by the Data Exporter and/or the Data Importer, in order to enable them to fulfil their obligations under the Binding Corporate Rules.

- 19.3.6 Following a suspension of a Transfer under this section 19, the Data Exporter will end the Transfer or set of Transfers if the Binding Corporate Rules cannot be complied with and compliance with the Binding Corporate Rules is not restored within one month of suspension. In these circumstances, the Workforce Data Transferred prior to the suspension, and any copies thereof, should at the choice of the Data Exporter, be returned to it or destroyed in their entirety.
- 19.3.7 Data Exporters will monitor, on an ongoing basis, and where appropriate in collaboration with Data Importers, developments in the Relevant Countries to which the Data Exporters have Transferred the Workforce Data that could affect the initial assessment of the level of protection and the decisions taken accordingly on such Transfers.
- 19.3.8 Without prejudice to the obligations of the Data Importer set out at section 19.3.5 above,
- a) each Data Importer will promptly notify the Data Exporter and, where possible the Worker (if necessary with the help of the Data Exporter) if it:
    - receives a legally binding request by a public authority under the laws of the Relevant Country, or of another Relevant Country, for disclosure of the Workforce Data Transferred pursuant to the Binding Corporate Rules, and such notification will include information about the Transferred Workforce Data requested, the requesting authority, the legal basis for the request and the response provided;
    - becomes aware of any direct access by public authorities to Workforce Data Transferred pursuant to the Binding Corporate Rules in accordance with the laws of the Relevant Country, and such notification will include all information available to the Data Importer.
  - b) if prohibited from notifying the Data Exporter and/or the Worker, the Data Importer will use its best efforts to obtain a waiver of such prohibition, with a view to communicate as much information as possible and as soon as possible, and will document its best efforts in order to be able to demonstrate them upon request of the Data Exporter.
  - c) the Data Importer will provide the Data Exporter, at regular intervals, with as much relevant information as possible on the requests received (in particular, number of requests, type of data requested, requesting authority(ies), whether requests have been challenged and the outcome of such challenges, etc.). If the Data Importer is or becomes partially or completely prohibited from providing the Data Exporter with the aforementioned information, it will, without undue delay, inform the Data

Exporter accordingly.

- d) the Data Importer will preserve the abovementioned information for as long as the Transferred Workforce Data are subject to the safeguards provided by the Binding Corporate Rules, and shall make it available to the competent Data Protection Authority upon request.
- e) the Data Importer will review the legality of the request for disclosure, in particular whether it remains within the powers granted to the requesting public authority, and will challenge the request if, after careful assessment, it concludes that there are reasonable grounds to consider that the request is unlawful under the laws of the Relevant Country, applicable obligations under international law, and principles of international comity. The Data Importer will also, under the same conditions, pursue possibilities of appeal. When challenging a request, the Data Importer will seek interim measures with a view to suspending the effects of the request until the competent judicial authority has decided on its merits. The Data Importer will not disclose the requested Transferred Workforce Data until required to do so under the applicable procedural rules.
- f) The Data Importer will document its legal assessment and any challenge to the request for disclosure and, to the extent permissible under the laws of the Relevant Country, make the documentation available to the Data Exporter. The Data Importer will also make it available to the competent Data Protection Authority upon request.
- g) The Data Importer will provide the minimum amount of information permissible when responding to a request for disclosure, based on a reasonable interpretation of the request.

## **20 TERMINATION PROVISIONS**

- 20.1 Subject to section 20.2, Citi recognizes that where a Citi entity which has previously Processed Transferred Workforce Data ceases to be bound by the Binding Corporate Rules, that Citi entity may keep, return or delete the Transferred Workforce Data received under the Binding Corporate Rules.
- 20.2 A Citi entity which has previously Processed Transferred Workforce Data and ceases to be bound by the Binding Corporate Rules may only keep such Transferred Workforce Data where the conditions of Part C of Appendix 1 are satisfied.

## **APPENDIX 1: CONTRACTING REQUIREMENTS FOR CONTRACTS RELATING TO TRANSFERRED EUROPEAN WORKFORCE DATA**

Citi must comply with:

- Part A of this Appendix for all contracts where Citi engages or takes on Non-employees; and
- Part B of this Appendix when Workforce Data is Transferred to a Data Processor which is not bound by this Procedure; or
- Part C of this Appendix when Transferred Workforce Data is Transferred to a Data Controller which is not bound by this Procedure.

Further guidance on Transfers of Workforce Data is available in the FAQs.

### **PART A**

A1. Before Citi engages or takes on Non-employees who will Process Transferred Workforce Data, the relevant contract must:

- A1.1 provide that such Non-employees will comply with Citi's policies; and
- A1.2 contain clear sanctions for breach of these policies, such as a right for Citi to terminate the contract, or to require that responsible Non-employees no longer Process Transferred Workforce Data.

### **PART B**

This section applies in addition to Part A where Citi transfers or makes available Workforce Data to a Data Processor (internal or external), which is not bound by this Procedure.

(Please refer to the FAQs for more information about Data Processors).

- B1. Citi will comply with the following provisions when transferring or making available Workforce Data to Data Processors.
  - B1.1 Citi must choose a Data Processor that can provide sufficient guarantees to implement appropriate technical and organisational security measures for the Processing that meet the requirements of European Data Protection Law and Citi must take reasonable steps to confirm compliance with those measures (considering the nature of the data being transferred).
  - B1.2 There must be a written contract with the Data Processor, which meets the requirements regarding engaging a Data Processor to Process personal data which are set out in the GDPR (or in a similar European Data Protection Law, as applicable). The written contract must:

- (a) be binding on the Data Processor with regard to Citi;
- (b) set out the subject matter and duration of the Processing, the nature and purpose of the Processing, the type of Workforce Data and categories of data subjects and the obligations and rights of the Data Controller;
- (c) stipulate that the Data Processor processes the Workforce Data only on documented instructions from the Data Controller, including with regard to transfers of Workforce Data to a Relevant Country or an international organisation, unless required to do so by applicable law to which the Data Processor is subject. In such a case, the Data Processor shall inform the Data Controller of that legal requirement before Processing, unless that law prohibits such information on important grounds of public interest;
- (d) stipulate that the Data Processor ensures that persons authorized to process the Workforce Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- (e) stipulate that the Data Processor takes all measures required pursuant to implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks to the rights and freedoms of the relevant Workers);
- (f) stipulate that the Data Processor must respect the conditions for engaging another Data Processor to Process personal data which are set out in the GDPR (or in a similar European Data Protection Law, as applicable);
- (g) stipulate that the Data Processor, taking into account the nature of the Processing, must assist the Data Controller by appropriate technical and organizational measures, insofar as this is possible, for fulfilment of the Data Controller's obligation to respond to requests for exercising a data subject's rights laid down in the GDPR (or in a similar European Data Protection Law, as applicable);
- (h) stipulate that the Data Processor must assist the Data Controller in ensuring compliance with the obligations regarding security, personal data breaches and data protection impact assessments which are set out in the GDPR (or in a similar European Data Protection Law, as applicable) taking into account the nature of Processing and the information available to the Data Processor;
- (i) stipulate that the Data Processor, at the choice of the Data Controller, must delete or return all the Workforce Data to the Data Controller at the end of the provision of the services relating to the Processing, and must delete existing copies unless European Union law or European Union

Member State law (or Jersey, Monaco or Swiss law as applicable) requires storage of the Workforce Data;

- (j) stipulate that the Data Processor must make available to the Data Controller all information necessary to demonstrate compliance with the obligations regarding Processing of Workforce Data and allow for and contribute to audits, including inspections, conducted by the Data Controller or another auditor mandated by the Data Controller; and
- (k) stipulate that the Data Processor must immediately inform the Data Controller if, in its opinion, an instruction from the Data Controller infringes European Data Protection Law.

B1.3 When transferring or making available Workforce Data to Data Processors in Relevant Countries, Citi will ensure that adequate protection is provided in accordance with European Data Protection Law.

## **PART C**

This section applies in addition to Part A when, in certain limited circumstances, Citi transfers or makes available Transferred Workforce Data to a Data Controller, which is not bound by this Procedure.

(Please refer to the FAQs for more information about Data Controllers.)

C1. In respect of Transfers from the EEA, Jersey, Monaco or Switzerland, Citi may transfer or make available Transferred Workforce Data to a Data Controller:

- C1.1.a In regard to Transfer from EEA or Jersey, where the Data Controller is located in a Member State of the EEA or a country or territory in respect of which the European Commission, in accordance with Directive 95/46/EC, or the GDPR, has declared there is an adequate level of protection for personal data, provided and only for so long as such decision of the European Commission remains in force and the recipient of the personal data satisfies any conditions relevant to the applicability of that decision; or
- C.1.1.b In regards to Transfers from Switzerland, where the Data Controller is located within a Member State of the EEA or any other country or territory with laws that provide an adequate level of data protection either according to the list published by the Federal Data Protection and Information Commissioner or, after the coming into force of the revised Federal Act on Data Protection, according to a binding adequacy decision by the Federal Council for as long as such country is in that list;
- C.1.1.c In regards to Transfers from Monaco, where the Data Controller is located within a Member State of the EEA or any other country or territory with laws that provide an adequate level of data protection

according to the list published by the Monaco government in a ministerial order for as long as such country is listed in the ministerial order;

or

- C1.2 Where the adequate protection is provided on the basis of (a) an adequacy decision, (b) the existence of appropriate safeguards or (c) binding corporate rules in accordance with the requirements of the GDPR (or a similar European Data Protection Law, as applicable) or a derogation set out in the GDPR (or a similar European Data Protection Law, as applicable) that permits transfers in the absence of an adequacy decision, appropriate safeguards or binding corporate rules applies.

## APPENDIX 2: RIGHTS FOR DATA PROTECTION AUTHORITIES

This Appendix 2 is without prejudice to, and does not restrict, existing investigative powers of any competent Data Protection Authority. Each Citi entity acknowledges and agrees that it may be audited by a competent Data Protection Authority in accordance with this Appendix or to the extent otherwise provided for under European Data Protection Law.

1. In this Appendix 2, "Audit" means an audit or inspection (including where necessary, on-site) conducted in accordance with this Appendix.
2. Each Citi entity shall take into account the advice of a competent Data Protection Authority on any issue related to Citi's Binding Corporate Rules as part of a Relevant Inquiry.
3. Each Citi entity will abide by any decision, which is final and against which no further appeal is possible, that a competent Data Protection Authority makes on any issue related to Citi's Binding Corporate Rules as part of a Relevant Inquiry.
4. Each Citi entity agrees to respond promptly to queries from competent Data Protection Authorities, to co-operate in good faith in relation to such queries, upon request to provide access to the results of an audit conducted under Section 14.4 of the Procedure and upon request provide the competent Data Protection Authorities with any information about the Processing covered by the Binding Corporate Rules.
5. Each Citi entity agrees that its compliance with all aspects of the Binding Corporate Rules may be audited by one or more competent Data Protection Authorities in accordance with this Appendix 2. Any audits carried out in accordance with this Appendix 2 may, at the relevant competent Data Protection Authority's discretion, either be conducted by the competent Data Protection Authority(ies), or, if Citi and the competent Data Protection Authority(ies) so agree, by a third party auditor, appointed by the competent Data Protection Authority(ies).
6. Any competent Data Protection Authority(ies) may conduct Audits on reasonable prior written notice to Citi's GDPR DPO and may conduct those Audits with such frequency as may be reasonable in the circumstances.
7. Any competent Data Protection Authority(ies) may also conduct Audits where the competent Data Protection Authority(ies) has/have reasonable grounds to suspect that a material breach of the Binding Corporate Rules has occurred.
8. The duty to co-operate and the obligation to submit to Audits shall, as regards

each competent Data Protection Authority, be limited to verifying that relevant Transferred Workforce Data is being Processed as described in these Binding Corporate Rules. Each competent Data Protection Authority shall only be entitled to conduct such Audits in circumstances where the Transfer of such Transferred Workforce Data is within its competence under European Data Protection Law.

9. Each competent Data Protection Authority will bear its own costs in relation to any Audit.
10. Any Citi entity subject to an Audit will co-operate in the Audit, however, there will be no requirement to make available information that is held by the relevant Citi entity subject to any regulation or law that would prohibit disclosure.
11. The relevant Citi entity will promptly be provided with a copy of the draft Audit report and shall be given an opportunity to discuss its findings with the relevant competent Data Protection Authority(ies) before the report is finalised.
12. All information obtained by any competent Data Protection Authority(ies) in the course of any Audit or a request under paragraph 4 above, as well as the Audit report, shall be treated as confidential information in accordance with that Data Protection Authority's obligations under the GDPR.
13. Any dispute related to a competent Data Protection Authority's exercise of supervision of compliance with the Binding Corporate Rules shall be resolved by the courts of the country of that competent Data Protection Authority in accordance with the laws of the country of that competent Data Protection Authority. Each Citi entity agrees to submit to the jurisdiction of such courts in such circumstances.

### **APPENDIX 3: PARTICIPATING COUNTRIES**

The following countries will be Participating Countries for the purposes of this Procedure:

- All countries in the European Economic Area;
- Switzerland;
- Monaco; and
- Jersey.

## **APPENDIX 4: LIST OF ENTITIES**

The list of Citi legal entities and the country in which they are located and their contact details are set out in Tables A and B below.

## A) European Citi Entities

Country	Citi Employing Legal Entity	Address Line 1	Address Line 2	Address Line 3	Company Number	Contact Details
<b>Austria</b>	Citibank Europe plc, Austria	Kärntner Ring 11-13/7/2/3	Wien 1010	Austria	FN443741k	Susan Dean (Legal Representative)
<b>Belgium</b>	Citibank Europe PLC Belgium Branch	Rue des Colonies 56	Bruxelles 1000	Belgium	0643.865.313	Nicolas de Callatay +32 2 641 94 59
<b>Bulgaria</b>	Citibank Europe plc, Bulgaria Branch Kcht	48 Sitnyakovo blvd., Oborishte Distr., fl. 10,	Sofia Stolichna 1505	Bulgaria	202861597	( 359 ) 02 917 5100
<b>Czechia</b>	Citibank Europe plc Czech Republic	Bucharova 2641/14, Praha 5 - Stodůlky	Hlavní město Praha 158 00	Czech Republic	281 98 131	Michael Nebesky (Branch Manager), ( 420 ) 233 062 330
<b>Denmark</b>	Citibank Europe plc Denmark	Vesterbrogade 1L, 5. tv.	1620 København V	Denmark	37208779	
<b>Finland</b>	Citibank Europe plc, sivuliike Suomessa	Aleksanterinkatu 48 A	00100 Helsinki	Finland	2716388-9	( 358 ) 09 34887101
<b>France</b>	Citibank Europe plc, France	Citibank Europe Plc 21 25, 21 Rue Balzac,	75406 Paris cedex 08	France	814 664 892 RCS Paris	Cécile Ratcliffe, branch manager <a href="mailto:Cecile.ratcliffe@cit.com">Cecile.ratcliffe@cit.com</a> +33 1 70 75 50 00
<b>France</b>	Citigroup Global Markets Europe AG France	21 25, 21 Rue Balzac,	75008 Paris 8e Arrondissement	France	847 887 270 RCS Paris	Cécile Ratcliffe, branch manager <a href="mailto:Cecile.ratcliffe@cit.com">Cecile.ratcliffe@cit.com</a> +33 1 70 75 50 00
<b>Germany</b>	Citibank Europe plc Germany	Reuterweg 16, 60323	Frankfurt am Main	Germany	60313B110882	( 49 ) 069 13660
<b>Germany</b>	Citibank N.A. Germany (Citibank, N.A. in New York, Filiale Frankfurt/Main)	Reuterweg 16, 60323	Frankfurt am Main	Germany	60313B10244	( 49 ) 069 13660
<b>Germany</b>	Citigroup Global Markets Europe AG	Boersenplatz 9	60313 Frankfurt am Main	Germany	60313B88301	( 49 ) 069 13660
<b>Germany</b>	Citigroup Global Markets Finance Corporation & Co. beschränkt haftende KG	Reuterweg 16	60323 Frankfurt am Main	Germany	60313A45670	( 49 ) 069 13660
<b>Greece</b>	Citibank Europe plc Greece	8 Othonos	Athens 10557	Greece	136957160001	( 30 ) 21 0329 2000
<b>Hungary</b>	Citibank Europe plc Hungary Magyarországi Fióktelepe	Váci út 80.	Budapest 1133	Hungary	01-17-000560	Kovács Gábor (CEO) ( 36 ) (1) 374 5000
<b>Ireland</b>	Citi Depositary Services Ireland Designated Activity Company	1 North Wall Quay	Dublin 1	Ireland	193453	David Morrison +353 16376300
<b>Ireland</b>	Citibank Europe plc	1 North Wall Quay	Dublin 1	Ireland	132781	+353 1 622 2000

	Country	Citi Employing Legal Entity	Address Line 1	Address Line 2	Address Line 3	Company Number	Contact Details
	Ireland	Citibank N.A. Ireland	1 North Wall Quay	Dublin 1	Ireland	903951	+353 1 622 2000
	Italy	Citibank Europe plc Italy	Piazzetta Bossi, 3	Milan, MI 20121	Italy	MI2077097	Matteo Perfetti (Branch Manager) +39 02 8906 4461
	Italy	Citibank N.A. Italy	Piazzetta Bossi, 3	Milan, MI 20121	Italy	MI600769	Matteo Perfetti (Branch Manager) +39 02 8906 4461 <sup>1</sup>
	Italy	Citigroup Global Markets Europe AG, Italy	Piazzetta Bossi, 3	Milan, MI 20121	Italy	MI2545583	Valentina Cicerone (Branch Manager) - +39 02 8906 8215
	Jersey	Citigroup (Channel Islands) Limited	38 Esplanade	St Helier JE4 8QB	Jersey	JE3466	+44 (0) 1534 608 000
	Luxembourg	Citibank Europe plc, Luxembourg Branch	31, Z.A. Bourmicht	L-8070 Bertrange	Luxembourg	B200204	Alberta Brusi +352 4514141
	Monaco	Citi Global Wealth Management S.A.M.	9, Boulevard des Moulins, Monte Carlo Palace	Monaco, 98000	Monaco	08S04740	General Phone Number: +377 97 97 5010 Alastair Thorpe-Beeston (General Manager): +377 97 97 5012
	The Netherlands	Citibank Europe plc Netherlands Branch	Schiphol Boulevard 257 WTC Building-Tower D, Floor 8 1118BH	Luchthaven Schiphol	Netherlands	64729206	Auke Leenstra 020-6514211
	Norway	Citibank Europe plc Norway Branch	Bolette Brygge 1	0252, Oslo	Norway	916074174	Rokke Pål
	Poland	Bank Handlowy w Warszawie S.A.	Ul. Senatorska 16	Warszawa, Mazowieckie, 00-923	Poland	000013037	+48.22.6577200
	Poland	Citibank Europe plc (Publiczna S A) Oddzial W Polsce	36 Ul. Prosta	Warszawa 00-838	Poland	140225259	( 48 ) 22 690 44 00
	Poland	Dom Maklerski Banku Handlowego S.A.	Ul. Senatorska 16	Warszawa, Mazowieckie, 00-923	Poland	010738608	+48-48226903944
	Portugal	Citibank Europe plc Sucursal em Portugal	Rua Barata Salgueiro, 30 5º 1269-056,	Edificio Fundacyo Lisboa,	Portugal	980542790	Leslie Rubio +34 915 384 100
	Romania	Citibank Europe plc Dublin sucursala Romania	145 Calea Victoriei, 1st District,	Bucharest, 010072	Romania	24882493	N/A
	Slovakia	Citibank Europe plc pobočka zahraničnej banky	Dvořákovo nábřežie, 7571/8	Bratislava-Staré Mesto, 811 02	Slovakia	36861260	Michal Nebeský ( 421 ) 02/582 304 00
	Spain	Citibank Europe plc Sucursal en Espana	Calle Jose Ortega Y Gasset, 29 - 2 28006	Madrid	Spain	W0073078H	Pedro López-Quesada +34 915 38 41 00

	Country	Citi Employing Legal Entity	Address Line 1	Address Line 2	Address Line 3	Company Number	Contact Details
							Miguel Trueba (Branch Manager)
	Spain	Citigroup Global Markets Europe AG Sucursal en Espana	Calle Jose Ortega Y Gasset, 29 - 2 28006	Madrid	Spain	W2765666I	Pedro López-Quesada +34 915 384 100
	Spain	Citispain S.A.	Calle Jose Ortega Gasset (- Edif. Beatriz) 29, 28006	Madrid	Spain	A28142081	Pedro López-Quesada +34 915 38 41 00
	Sweden	Citibank Europe plc Sverige filial	Birger Jarlsgatan 6	114, 84 Stockholm	Sweden	SE516406099701	( 46 ) 08-723 34 00
	Switzerland	Citibank, N.A., , Sioux Falls, Zurich Branch	Prime Tower, Hardstrasse 201,	Zurich, 8005	Switzerland	CHE-112.805.152	General Phone-Number: +41 58 750 70 00 Nicholas Ditchfield (General Manager): +41 58 750 73 78
	Switzerland	Citibank, N.A., Sioux Falls, succursale de Genève	Quai de la Poste 2	Geneva, 1204	Switzerland	CHE-105.823.328	General Phone-Number: +41 58 750 70 00 Nicholas Ditchfield (General Manager): +41 58 750 73 78
	Switzerland	Citigroup Global Markets Limited, London, Zweigniederlassung Zürich	Hardstrasse 201	Zurich, 8005	Switzerland	CHE-107.486.319	General Phone-Number: +41 58 750 60 00 Alex Neumann (General Manager): +41 58 750 60 60
	Switzerland	Citibank (Switzerland) AG	Hardstrasse 201	Zurich, 8005	Switzerland	CHE-105.818.184	General Phone-Number: +41 58 750 50 00 Nina Grainger (General Manager): +41 58 750 77 52

## B) Non-European Citi Entities in Relevant Countries Processing European Workforce Data

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
1.	USA	Citibank N.A.	388 Greenwich Street,	New York, NY 10013	US	OCC Charter # 1461	1-212 559-1000
2.	USA	Citigroup Global Markets Inc.	388 Greenwich Street,	New York, NY 10013	US	Federal Tax Identification Number:112418191	( 1 ) (212) 816-6000
3.	USA	Citigroup Technology Inc	388 Greenwich Street,	New York, NY 10013	US	Federal Tax Identification Number:13-3108991	( 1 ) (201) 319-0604
4.	USA	Citigroup Washington Inc.	1101 Pennsylvania Avenue N.W.	Washington District of Columbia 20004	US	Federal Tax Identification Number:13-3467406	202-879-6853
5.	USA	Citigroup Energy Inc.	388 Greenwich Street	New York, NY 10013	US	Federal Tax Identification Number:27-0069674	(713) 752-5200
6.	USA	Citi Fund Services Ohio Inc.	4400 Easton Commons	Columbus, Ohio 43219	US	Federal Tax Identification Number:31-1249295	(813) 604-9013
7.	USA	Citigroup Corporate Holdings Inc.	388 Greenwich Street,	New York, NY 10013	US	Federal Tax Identification Number:13-3070495	( 1 ) (221) 559-1000
8.	USA	Citi Ventures Inc.	388 Greenwich Street,	New York, NY 10013	US	Federal Tax Identification Number:13-3096320	N/A
9.	Algeria	Citibank N.A. Algeria	Immeuble Le Ksar,	34/35 Quartier d'affaires Bab Ezzouar	16311 Alger	RC (Numéro d'immatriculation): 98B0003432	+213 21 98 19 00
10.	Australia	Citigroup Pty Limited	26th Floor, Citigroup, 2 Park Street	Sydney NSW 2000	Australia	004325080	+61 (2) 8225 1000
11.	Australia	Citibank N.A. Australia	Level 23 2 Park Street	Sydney NSW 2000	Australia	ARBN 072 814 058 ABN 34 072 814 058	+61 (2) 8225 1000
12.	Australia	Citigroup Global Markets Australia Pty Limited	Level 23 2 Park Street	Sydney NSW 2000	Australia	Federal Tax Identification Number:98-0188763	+61 (2) 8225 1000
13.	Bahrain	Citibank, N.A. Bahrain Branch	Citibank House, Building 1133, Road 2819	Al Seef District Block 428, Manama	Bahrain	11081 & 5332 -1	( 973 ) 1758 8588

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
14.	Bahrain	Citi Islamic Investment Bank E.C.	Citibank House, Building 1133, Road 2819	Al Seef District Block 428, Manama	Bahrain	35731-1	( 973 ) 1758 8588
15.	Bangladesh	Citibank N.A. Bangladesh	8 Gulshan Avenue, Gulshan-1	Dhaka - 1212	Bangladesh	Parent entity: OCC Charter # 1461	+880 966 699 1000 bangladesh.citiservice@citi.com
16.	Chile	Citigroup Chile International SPA	El Bosque Norte 500 7th Floor Las Condes	Santiago Región Metropolitana de Santiago 7550092,	Chile	79774670-3	-224309472
17.	Chile	Citigroup Services Chile SPA	El Bosque Norte 500 7th Floor Las Condes	Santiago Región Metropolitana de Santiago 7550092	Chile	RUT 77.486.356-7	-224309472
18.	China	Citigroup Services and Technology (China) Limited	8F (nominal floor 8F and actual floor being 7F), No.258 Jin Kang Road China (Shanghai) Pilot Free Trade Zone	Shanghai, 201203	China	3.10115E+14	+86 2168604588
19.	China	Citibank (China) Co. Ltd	Unit 01A & 04 of 28F, 29F, 30F, Units 1 of 33F, 34F and 35F, Citigroup Tower, No.33 Hua Yuan Shi Qiao Road, Lu Jia Zui Finance and Trade Zone,	Shanghai, 200120	China	USCC 913100007989811341 (统一社会信用代码)	+86 21-28966000
20.	Colombia	Citibank-Colombia S.A.	Carrera 9A No. 99-02 Piso 3	BOGOTA Distrito Capital de Bogotá	Colombia	Nit:860.051.135-4	Elizabeth.Rey@citi.com
21.	Colombia	Colrepfin Ltda	Carrera 9A No. 99-02 Piso 3	BOGOTA Distrito Capital de Bogotá	Colombia	Nit:900.213.856-7	Aroldo.Penagos@citi.com
22.	Costa Rica	Citi Business Services Costa Rica SRL	La Ribera de Belén, Building A Centro Corporativo El Cafetal, Building A	La Ribera Heredia	Costa Rica	3-102-516459	( 506 ) 4051 7417
23.	Dominican Republic	Citibank N.A. Dominican Republic	Av. Winston Churchill No. 1099, Torre Citi en Acropolis Center,	Ens. Piantini, Santo Domingo, Distrito Nacional,	Dominican Republic	RNC 1-01-01169-6	(809) 566-5611 citiservicedominicana@citi.com

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
			Pisos 24 y 26,				
24.	Ecuador	Citibank N.A. Ecuador Branch	Avenida Republica de El Salvador	N36-230 y Naciones Unidas, QUITO	Ecuador	1790033295001	Marcelo.Montenegro@citi.com
25.	Egypt	Citibank N.A. Egypt Branch	Citibank Building - Boomerang Branch	Plot 46, Zone J, 1st District, Town Center Cairo 11511	Egypt	204-891-450	002 1006600230
26.	El Salvador	Inversiones Integrales IFC, LTDA De C.V.	Edificio PALIC, Alameda Dr. Manuel E. Araujo y Calle Nueva No. 1,	C.A. San Salvador	El Salvador	0511-260202-101-8 (Registro de Comercio / NIT)	+(503) 2211 – 2855
27.	Guatemala	Administradora de Valores de Guatemala, S.A	3a. Avenida 13-78 Zona 10, Torre Citi , Nivel 16	Guatemala City, 01010	Guatemala	7101333	(502) 2336 8001
28.	Honduras	Banco de Honduras S.A.	Tegucigalpa Torre Agalta, Level 15, Boulevard Morazan,	Tegucigalpa, M.D.C.	Honduras	68811	deroli.nunez@citi.com
29.	Hong Kong	Citibank N.A. Hong Kong Branch	50/F, Champion Tower, Three Garden Road	Hong Kong	Hong Kong	CR No: F0000042	( 852 ) 2868 8888
30.	Hong Kong	Citigroup Technology Infrastructure (Hong Kong) Limited	Citi Tower, One Bay East, 83 Hoi Bun Road	Kwun Tong, Kowloon	Hong Kong	93479	( 852 ) 2868 8888
31.	Hong Kong	Citibank (Hong Kong) Limited	Citi Tower, One Bay East, 83 Hoi Bun Road	Kwun Tong, Kowloon	Hong Kong	Federal Tax Identification Number:98-0435511	( 852 ) 2868 8888
32.	Hong Kong	Citigroup Global Markets Asia Limited	50/F, Champion Tower, Three Garden Road	Hong Kong	Hong Kong	215168	( 852 ) 2501 2000
33.	Hong Kong	Citicorp International Limited	50/F, Champion Tower, Three Garden Road	Hong Kong	Hong Kong	Federal Tax Identification Number:98-0473482	+852 2868 6666
34.	India	Citibank N.A. India Branch	Plot C61 Bandra Kurla Complex,	Mumbai 400070 Maharashtra,	India	FCRN / Company No. F00471	91-22-4955-2425
35.	India	Citicorp Services India Private Limited	B7, 5th Floor, Nirlon Knowledge Park, Goregaon (East),	Mumbai 400063 Maharashtra,	India	U72900MH2009FTC192938	csiplsecretarial@citi.com

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
36.	Indonesia	Citibank N.A. Indonesia Branch	Pacific Century Place, 8th - 10th Floor, SCBD Lot 10,	Jl. Jend. Sudirman Kav. 52-53, Jakarta Selatan 12190	Indonesia	0220303752293	+62 21 29961700/1500983
37.	Kazakhstan	Citibank Kazakhstan JSC	Park Palace, Bldg. A 26/41 Zenkova street	Almaty Almaty oblysy A25T0A1	Kazakhstan	Federal Tax Identification Number:98-0657341	citibank.kazakhstan@citi.com +7(727)3321400
38.	Kenya	Citibank N.A. Kenya Branch	Citibank House, Upper Hill Road	P.O. Box 3071100100, Nairobi	Kenya	A-1560	(020) 275 4000 or (020) 275 4444
39.	Malaysia	Citigroup Transaction Services (M) Sdn. Bhd.	Level 47, Menara Citibank, 165 Jalan Ampang ~	10050 Penang Kuala Lumpur Wilayah Persekutuan Kuala Lumpur	Malaysia	203959W	( 60 ) 04-200 6009
40.	Mexico	Citi-Info, S. de R.L. de C.V.	Prolongación Reforma 1196, Piso 24, Col. Santa Fe Cuajimalpa, Cuajimalpa de Morelos,	C.P. 05348	Mexico	CIN850529AH4	( 52 ) 01 55 2262 1068
41.	Mexico	Banco Citi Mexico Sociedad Anonima Institucion de Banca Multiple Grupo Financiero Citi Mexico	Moras 850 Acacias , Benito Juarez	Mexico City 03240	Mexico	LEI 529900H31AYI6WA1J 534	52 800 248 2484 contacto@citi.com.mx
42.	Nigeria	Citibank Nigeria Limited	Charles S. Sankey House No. 27 Kofo Abayomi Street	Lagos 6391	Nigeria	RC-62430	+234 (0)201 277 4700   +234 (0)201 279 8477-8
43.	Pakistan	Citibank N.A. Pakistan Branch	15th Floor, The Harbour Front	Dolmen Citi, Block 4, Scheme 5, Clifton	Karachi Pakistan	0700253-0	+92 (0) 21 111 999 999
44.	Panama	Citibank N.A. Panama Branch	Edificio Torre de las Americas,	Torre B Piso 12	Panama City, Panama	39-35-5021DV79	+ (507) 3019400
45.	Paraguay	Citibank N.A. Paraguay Branch	Citibank Center	Avda. Mariscal Lopez 3794 y Cruz del Chaco, Central, Asuncion	Paraguay	80001906-7	<a href="mailto:cecilio.alberto.centurion@citi.com">cecilio.alberto.centurion@citi.com</a>
46.	Peru	Citibank del Peru S.A.	Av. Canaval y Moreyra #480,	Piso 3 San Isidro Lima	Peru L27	RUC 20100116635	+51 215-2000 +51 215-2204

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
							+51 215-2208 +51 440-9044
47.	Philippines	Citibank N.A. Philippines Branch	34th Street	Bonifacio Global City, Makati 1200	Philippines	F000000009	( 63 ) 289959999
48.	Philippines	Citibank N.A – Regional Operating Headquarters	Citi Plaza, 34 <sup>th</sup> Street,	Bonifacio Global City, Taguig, Philippines	Philippines	F000000009	(63) 9778235378.
49.	Singapore	Citibank N.A. Singapore Branch	8 Marina View, No 21-00 Asia Square Tower 1,	018960, Singapore	Singapore	S27FC0556D	( 65 ) 6225 5221
50.	Singapore	Citicorp Investment Bank (Singapore) Limited	8 Marina View, No 21-00 Asia Square Tower 1,	018960, Singapore	Singapore	UEN 197200204M	(62) 255225
51.	South Africa	Citibank N.A. South Africa Branch	145 West Street Sandown	Sandton 2196, South Africa	South Africa	199500739610	( 27 ) 011 944 0219
52.	South Africa	Citigroup Global Markets (Proprietary) Limited	145 West Street Sandown	Sandton 2196, South Africa	South Africa	Reg. No. 2000/025866/07	( 27 ) 011 944 0219
53.	Taiwan	Citibank Taiwan Ltd. TWDFCY	12/13/14/15/16F, No. 1, Songzhi Rd. Xinyi District	Taipei 110	Taiwan	98-0570112	886-2-8725-5777
54.	Thailand	Citibank N.A. Thailand Branch	399 Interchange 21 Building, Sukhumvit Road,	Klongtoey Nua Sub-district, Wattana District, Bangkok	Thailand	0100528000127	dpo.officethailand@citi.com
55.	Turkey	Citibank Anonim Sirketi	Eski Buyukdere Caddesi, Tekfen Tower No. 209	Levent, Istanbul 34394	Turkey	512211	+90 212 319 44 01
56.	Ukraine	Joint Stock Company Citibank	16-G Dilova str.	Kiev, 03150	Ukraine	EDRPOU code - 21685485	citibank.ukraine@citi.com +38 044 490-10-00
57.	United Arab Emirates	Citibank N.A. – United Arab Emirates	Oud Metha Tower, PO Box 749, Opposite WAFI City, Sheik Rashid Road,	Dubai,	United Arab Emirates	202563	+9714 5099790
58.	United Arab Emirates	Citigroup Global Markets Limited Dubai	Unit Office-1, Level 7, Gate Precinct Building 2	Dubai International Financial Centre, Dubai	United Arab Emirates	221	+9714 5099790
59.	United Arab	Citibank N.A. UAE – DIFC	Unit Office-1, Level 7,	Dubai International	United Arab	1948	+9714 5099790

No.	Country	Legal Vehicle Entity Name	Address Line 1	Address Line 2	Address Line 3	Company number	Contact details
	Emirates	Branch	Gate Precinct Building 2	Financial Centre, Dubai	Emirates		
60.	United Arab Emirates	Citibank N.A. UAE - GCB Multiple Ledger	Al Wasl Branch PO Box 749	Dubai	United Arab Emirates	202563	+9714 5099790
61.	United Arab Emirates	Citibank N.A. UAE – ADGM Branch	5th Floor, Al Sila Tower, Abu Dhabi Global Market Square	Al Maryah Island, Abu Dhabi	United Arab Emirates	180011	+971 2 502 4050
62.	Vietnam	Citibank N.A. Vietnam Branch	Floor 15, Sunwah Tower, 115 Nguyen Hue,	Sai Gon Ward, Ho Chi Minh City,	Vietnam	1299369	(84 28) 3521 1118

## APPENDIX 5: DESCRIPTION OF TRANSFERS

### Human Resources:

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<i>Benefits</i>	<i>Manage and Deliver Employee Benefits Programs  Manage Medical and Well-Being Services</i>	<i>Employees, Prospective employees, Former employees, Employee family members and emergency contacts</i>	<i>Personal Identifiers. Protected Personal Identifiers. Employee Benefits data. Calendar, attendance and leave data (including sick leave and vacations) Health and Medical Data. Demographic data (*in relation to benefits) End of Contract Data Travel, Expense Accident Insurance Data. Emergency Contact Data.</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Australia, China, Hong Kong, Kenya, Malaysia, Mexico, Singapore, Taiwan, Thailand, Turkey</i>
<i>Compensation</i>	<i>Manage Employees Compensation Manage Employee Deferred Compensation Manage Employee Recognition Programs and Administration Manage Compensation Framework</i>	<i>Employees, Prospective employees, Former employees</i>	<i>Personal Identifiers. Financial Data from Persons subject to the SM regime. Payroll, Compensation, Employee Benefits and Taxation Data. Calendar, attendance and leave data (including sick leave and vacations). End of Contract Data</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Australia, China, Hong Kong, Malaysia, Mexico, Singapore, Taiwan, Thailand, Turkey</i>
<i>Employee Performance Management</i>	<i>Manage and Assess Employee Performance Administer Feedback</i>	<i>Employees, former employees</i>	<i>Personal Identifiers Professional, Employment and Educational History Data Learning and Professional Development Occupational Survey Data Calendar, attendance and leave data (including sick leave and vacations) Employee and Industrial Relations Data Building Access and Security Data</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Colombia, Mexico, Singapore</i>
<i>Employment Relations</i>	<i>Discipline Employees</i>	<i>Employees, former employees</i>	<i>Personal Identifiers. Payroll, Compensation, Employee Benefits and Taxation Data. Professional, Employment and Educational History Data. Learning and Professional</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Colombia, El Salvador, Hong Kong, Mexico, Singapore</i>

			<p>Development Data. Occupational Survey Data. Calendar, attendance and leave data (including sick leave and vacations). Employment and Industrial Relations Data. Health and Medical Data End of Contract Data</p>	
Learning	<p>Learning Framework Development Manage Employee Learning</p>	<p>Employees, Former employees</p>	<p>Personal Identifiers Professional, Employment and Educational History Data Employee and Industrial Relationship Data</p>	<p>HR main service locations: Costa Rica, India Philippines, UAE, US</p> <p>HR additional service locations: Australia, China, Hong Kong, Indonesia, Mexico, Singapore, Taiwan,</p>
Manage Core HR	<p>Manage Employee Offboarding Manage Employee Changes Discipline Employees Manage Workplace Support Manage Medical and Well-Being Services</p>	<p>Employees, Prospective employees, Former employees, Employee family members and emergency contacts</p>	<p>Personal Identifiers Protected Personal Identifiers. Payroll, Compensation, Employee Benefits and Taxation Data Professional, Employment and Educational History Data Calendar, daily attendance, leave data (including vacations and sick leave). Vehicle Data Employee and Industrial Relationship Data. End of Contract Data Building Access and Security Data. Demographic Data. Health and Medical Data. Emergency Contact Data.</p>	<p>HR main service locations: Costa Rica, India, Philippines, UAE, US</p> <p>HR additional service locations: Bahrain, China, Colombia, Honduras, Hong Kong, Indonesia, Mexico, Nigeria, Pakistan, Panama, Singapore, South Africa, Taiwan, Turkey, Vietnam</p>
Manage Employee Mobility and Immigration	<p>Manage Employee Immigration Manage Employee Mobility</p>	<p>Employees, Prospective employees, Employee family members and emergency contacts</p>	<p>Personal Identifiers Protected Personal Identifiers (in relation to travel assistant) Financial and Payroll Data Health and Medical Data</p>	<p>HR main service locations: Costa Rica, Philippines, India, US</p> <p>HR additional service locations: China, Mexico</p>
Perform Workforce Management	<p>Manage Organization Design Manage Skills Planning Manage Resource Planning Manage Capacity Planning Manage Operational Excellence Capability Risk Management</p>	<p>Employees, Prospective employees, Former employees</p>	<p>Personal Identifiers Professional, Employment and Educational History Data Learning and Professional Development Data Occupational Survey Data Calendar, attendance and leave data (including sick leave and vacations) Employment and Industrial Relations Data End of Contract Data</p>	<p>HR main service locations: Costa Rica, India, Philippines</p> <p>HR additional locations: China, Guatemala, Indonesia, Mexico, Paraguay, Singapore</p>

<i>Talent Acquisition</i>	<i>Administer Onboarding Perform Candidate Sourcing and Selection Create and Administer Pre-hire Offer/Employment agreements Conduct Pre-hire and Employee (Re)Screening</i>	<i>Employees, Prospective employees</i>	<i>Personal Identifiers Protected Personal Identifiers Financial Data from persons subject to the Senior Managers regime. Professional, Employment and Educational History. Payroll, Compensation, Employee Benefits and Taxation Data. Health and Medical data</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Australia, Bahrain, Chile, China, Colombia, El Salvador, Guatemala, Hong Kong, Indonesia, Kenya, Malaysia, Mexico, Pakistan, Singapore, South Africa, Taiwan, Thailand, Turkey, Vietnam.</i>
<i>Talent and Engagement</i>	<i>Manage Employee Engagement Assess and Manage Talent</i>	<i>Employees, Former employees</i>	<i>Personal Identifiers. Protected Personal Identifiers Demographic Data (* with consent) Professional, Employment and Educational History Learning and Professional Development Data Occupational Survey Data Behavioural Data (* with consent)</i>	<i>HR main service locations: Costa Rica, India, Philippines, UAE, US  HR additional service locations: Australia, Colombia, Mexico Singapore</i>
<i>Time and Absence</i>	<i>Manage Time at Work Manage Time Away from Work</i>	<i>Employees</i>	<i>Personal Identifiers Protected Personal Identifiers (in relation to special categories of personal data in connection with leave requests) Payroll, Compensation, Employee Benefits and Taxation Data Calendar, attendance and leave data (including sick leave and vacations). Health and Medical Data Emergency contact data</i>	<i>HR main service locations: India, Philippines, UAE, US  HR additional service location: Australia, China, Hong Kong, Indonesia, Kenya, Malaysia, Mexico, Singapore, Taiwan, Thailand, Turkey</i>
<i>Global Directory</i>	<i>Work contact details made available within Citi</i>	<i>Employees Former employees</i>	<i>Name Work related identifiers (GEID, SOEID) Work contact details Work information, Position, management line Work location information</i>	<i>All Citi entities globally</i>

### COO and Technology

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destinations</b>
<i>Shared Services/ Business Shared Services (BSS)</i>	<i>Provide Report Distribution and Archiving Services</i>	<i>Current Employees</i>	<i>– Email Address</i>	<i>China; Singapore</i>

<i>Tax Information Reporting</i>	<p><i>Ireland - SMB&amp;IC Operations - Tax Information Reporting and Indirect Tax</i></p> <p><i>Mumbai - SMB&amp;IC Operations - Tax Information Reporting and Indirect Tax</i></p> <p><i>Switzerland – SMB&amp;IC Operations – Tax Information Reporting</i></p> <p><i>UK - SMB&amp;IC Operations - Tax Information Reporting and Indirect Tax</i></p>	<i>Current Employees</i>	<ul style="list-style-type: none"> <li>– SOEID, GEID, RITS, Employee ID (Authentication Credentials)</li> <li>– Employment History</li> <li>– License or Vehicle Identifiers</li> <li>– SSN (Social Security #) or other Government ID</li> <li>– Email Address</li> <li>– Personal Telephone #, Fax #, Mobile #</li> <li>– Place of Birth</li> <li>– Name or Initial</li> <li>– Date of Birth</li> <li>– Personal Mailing Address</li> <li>– Citizenship Status</li> <li>– Work Telephone #, Fax #, Mobile #</li> <li>– Account Holder Name</li> </ul>	<i>India</i>
<i>End User Services</i>	<i>Provide Engineering Technology Life Cycle (ETLC) Virtual Assistance</i>	<i>Current Employees</i>	– SOEID, GEID, RITS, Employee ID (Authentication Credentials)	<i>Singapore; US</i>
	<i>Provide Manager Desktop &amp; Process Analytics</i>	<i>Current Employees</i>	– Device Identifiers	<i>India; Singapore; US</i>

**Services, Markets, Banking & Client (SMBC):**

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destinations</b>
<i>Voice of Client</i>	<i>Annual BCMA &amp; TTS led programme to collect client feedback/satisfaction levels. The audience is Treasurers &amp; Assistant Treasurers (for BCMA). Essentially, pre-existing PII data is leveraged for a client survey.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>BCMA Referrals</i>	<i>In the course of general BCMA activity, there may be cause to refer a client or a counterparty to another business line who is better suited to meet their needs/due to a cross-selling opportunity. This may result in the passing of PII from BCMA to other groups. (e.g. Citi Private Bank through the BCMA Business Development Group process)</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Routine client Contact &amp; Client Business Cards Arranging Roadshows</i>	<i>As a coverage organization, there may be situations (in the course of day-to-day client interaction over e-mail) when client PII is collected inadvertently or where existing PII is</i>	<i>The transfer of workforce data is ancillary and incidental to the general</i>	<i>Name, work email address SOEID, GEID, RITS,</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India,</i>

	<i>used for targeted communication or calling specific clients.</i>	<i>business communication for carrying out business as usual.</i>	<i>(Authentication Credentials)</i>	<i>Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Marketing/prospecting database maintenance</i>	<i>Marketing of Citi products / services to existing customers / database of potential clients - contact details / preliminary client files - includes PII data processing of individual counterparties, their employees.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Commodities - Pre-Transaction, Execution, Post-Transaction</i>	<i>Transaction, Trade and Service Execution The processes related to the execution of a trade, transaction or service before the post trade, transaction or service activities are performed.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Credit Origination / Underwriting / Lending Management</i>	<i>Credit analyses of prospective and existing credit customers, including its management / individual owners and credit docs preparation / maintenance. PII data included in the contractual documentation / due diligence.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Customer On-boarding - Account Opening &amp; Approval, Application Processing, Product Feature Implementation, Program and Product Setup, Account opening &amp; maintenance, Customer Relationship Management, Customer Screening, Customer</i>	<i>The processes supporting the opening of a new account for a new or existing Customer.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>FX - Customer Onboarding, Account Servicing, Marketing &amp; Sales</i>	<i>The processes initiated within the overall client onboarding lifecycle including account opening, product permissions.</i>	<i>The transfer of workforce data is ancillary and incidental to the general</i>	<i>Name, work email address SOEID, GEID, RITS,</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India,</i>

		<i>business communication for carrying out business as usual.</i>	<i>(Authentication Credentials)</i>	<i>Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>ICM Underwriting / IRAU, Counterparty Exposure, Collateral Management &amp; Portfolio Management, Credit Risk Management Services, Transaction Management, Product Development</i>	<i>Activities include: Prospecting &amp; Onboarding Originations, Underwriting &amp; Credit Approval Loan Closing Booking &amp; Funding Loan Servicing &amp; Credit Monitoring Portfolio Monitoring &amp; Limits Reporting &amp; Analytics</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Mkts Treasury - Pre-Transaction, Execution, Post-Transaction, Customer Onboarding, Marketing &amp; Sales</i>	<i>Pre-Transaction, Pre-Trade and Pre-Service Execution  Post-Transaction, Post-Trade and Post-Service Execution</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Money Movement - Deposit Transaction Processing, - Domestic Payment / Instant Payment / Cross Border/Cross Currency Payment / Spring - C2B , Maturity and Repayment , Optimize Client Liquidity - Optimize Client Liquidity - Internal/External, Payment Initiation , Payment Processing &amp; Interest, Principal, and Escrow Payments, Rebates Processing, Refunds Management, Wire Transfer</i>	<i>1) Event Creation 2) Income and Corporate Actions Entitlement Calculation and Notification 3) Customer Elections Management and Processing 4) Customer Notification Management - 5) Corporate Actions 6) Event Eligibility Management - 7) Income and Corporate Actions Entitlement Completion -</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>New Deal Signing</i>	<i>The process provides ability to external and internal users to originate payments through various digital channels (CitiDirect, CitiConnect SWIFT, COSMOS etc.) for a variety of payment mode (Wire, Cash, Low value clearing/ACH, Real Time Payments). The process encompasses various steps from setting up the client instructions to payment , authorization and finally payment generation.</i>	<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Portfolio Management - Asset Distribution</i>		<i>The transfer of workforce data is ancillary and incidental</i>	<i>Name, work email address SOEID, GEID,</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala,</i>

		<i>to the general business communication for carrying out business as usual.</i>	<i>RITS, (Authentication Credentials)</i>	<i>Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Pre and Post-Transaction, Post-Trade and Post-Service Execution - Accounting and Valuation , Client Performance and Activity Statements, Product Custody, Profit and Loss, Profit Attribution Analysis and Risk Generation, Collateral and Margin Management, Client Invoice Processing, Fund Performance Reporting, Lifecycle Modification, Activities, Announcements and Election Processing, Product Agency lending</i>		<i>The transfer of workforce data is ancillary and incidental to the general business communication for carrying out business as usual.</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>

### Finance

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<i>Tax Form Validation: validation of CRS and US tax forms including but not limited to, Forms W9, W8 series, and CRS self-certifications; maintenance of client and account tax status and classifications in relevant systems; monitoring and/or curing of changes in circumstance; annual due diligence for expiring tax forms; ongoing monitoring of client and account tax information; handling client queries related to new account due diligence and pre-existing account due diligence; project management and business analysis support for related projects.</i>	<i>Tax forms</i>	<i>Employees</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Access Location: India, US</i>
<i>Tax Form Validation: validation of CRS and US tax forms including but not limited to, Forms W9, W8 series, and CRS self-certifications; maintenance of client and account tax status and classifications in relevant systems; monitoring and/or curing of changes in circumstance; annual due diligence for expiring tax forms; ongoing monitoring of client and account tax information; handling client queries related to new account due diligence and pre-existing account due diligence; project management and business analysis support for related projects.</i>	<i>Tax forms</i>	<i>Employees</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Access Location: India, US</i>
<i>Information Reporting: including, but not limited to, FATCA reporting (IRS Form 8966 or Model 1 IGA submission); IRS reporting (1099, 1098, &amp; 1042-S); CRS reporting; other regulatory reporting under these regimes. Identification of reportable accounts; consolidation and validation of the reportable data; creation and submission of the transmittal file; handling client queries; project management and business analysis support for related projects.</i>	<i>Tax forms</i>	<i>Employees</i>	<i>Name, work email address SOEID, GEID, RITS, (Authentication Credentials)</i>	<i>Access Location: India, US</i>

### Real Estate Services

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<i>Citi Workplace App (Modo)</i>	<i>Mobile workplace application for employees to include features such as: Building &amp; amenities information, seat and conference room booking and local events information</i>	<i>Employees</i>	<i>Name, SOEID, work address</i>	<i>Main Service locations: US</i>

QBIQ.AI	Layout planning tool to develop test fits in support of new projects and provides consistent space plan layouts and metrics/analytics reports.	Employees	SOEID	Singapore, US
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### Enterprise Services & Public Affairs (ESPA)

Processing Activity	Purposes of the processing	Categories of data subjects	Categories of personal data (not limited to)	International Transfer Destination
Manage Corporate Hospitality Services (VEMS)	Create and manage user profile in order to facilitate conference facility booking	Employees	Name, SOEID, email address, business address, work telephone number, GOC code, managed segment	Main Service Locations: Hong Kong, US
Citi Events Management	Event registration and management platform	Employees	Name, email address, company name, telephone number, dietary requirements.	Main Service locations: Hong Kong, Philippines, US
Citi Alumni Network	Networking platform for former employees to stay connected to the organisation and foster professional collaboration through events.	Former employees	Name, email address, physical address, Citi ID, professional/employment history	Main Service locations: Hong Kong, Philippines, US

### Legal

Processing Activity	Purposes of the processing	Categories of data subjects	Categories of personal data (not limited to)	International Transfer Destination
Manage Regulatory Change	The process to manage regulatory change including activities, such as 1) identify applicable regulatory requirements, b) monitor the regulatory environment for changing or emerging regulations, and c) maintain a repository of applicable laws, rules, and regulations. This process is not applicable to activities related to financial regulatory reporting.	Employees/Non-Employees	Name, employee ID	Transfer via CRC, and access by Legal Reg Change team from: US  Access by Legal Reg Change team members: Australia, Columbia, Costa Rica, Hong Kong, India, Indonesia, Malaysia, Mexico, Pakistan, Panama, Philippines, Singapore, Thailand, Vietnam
Provide Corporate Governance Support Services	Includes services provided in support of Citi corporate governance including i) maintenance of records for certain legal vehicles, including issuance of certificates, resolutions, and signing authorities, ii) coordinate preparation of Citi's annual proxy statement, iii) receive and process shareholder proposals, iv) coordination of the annual general meeting of stockholders, (v) coordinate investor engagement for proxy statement and esg matters, vi) coordination of board director policy and regulatory compliance), (vii) develop and update guidance for materials and presentations and manage all processes required therein, viii) board meeting support functions, (ix) drafting, updating and approval of corporate	Employees/non-employees	Name, employee ID	US

	<i>governance constituent documents and policies (charters, by-laws, etc.), (x) determine board independence and recommend for approval; evaluate board relationships for conflicts of interest and address as necessary; and (xi) coordinate board and committee self assessment process.</i>			
<i>Provide Legal Advice (General)</i>	<i>Provide legal advice to protect the firm's well-being and reputation as well as assist internal stakeholders in executing and evaluating risks associated with their functions, including completing transactions, delivering products and services, representation of the bank's interests in litigation and regulatory matters, and other activities requiring legal advice.</i>	<i>Employees/non-employees</i>	<i>Name, employee ID</i>	<i>India, US</i>
<i>Provide Legal Advice (Litigation and Employment)</i>	<i>Provide legal advice to protect the firm's well-being and reputation as well as assist internal stakeholders in executing and evaluating risks associated with their functions, including completing transactions, delivering products and services, representation of the bank's interests in litigation and regulatory matters, and other activities requiring legal advice.</i>	<i>Current, Prospective, former Employees/Non-Employees</i>	<i>Name, employee ID, Education History, Employment History, Gender, Gender Identity, Racial or Ethnic Origin, Religious or Philosophical Beliefs, Sex Life or Sexual Orientation, data concerning health, performance data, disciplinary data</i>	<i>Singapore, US</i>
<i>Provide Litigation Management</i>	<i>Provide non-advisory legal support related to litigation and regulatory matters.</i>	<i>Current, Prospective, former Employees/Non-Employees</i>	<i>Name, employee ID, address, e-mail and telephone number</i>	<i>India, US</i>
<i>Manage Employee Complaints</i>	<i>The process of managing employee complaints includes implementation of the Employee Complaints Policy, administration of the Citi Ethics Hotline, oversight of the investigation of employee complaints, and tracking and reporting of Employee Complaints.</i>	<i>Current, Prospective, former Employees/Non-Employees</i>	<i>Name, employee ID, Education History, Employment History, Gender, Gender Identity, Racial or Ethnic Origin, Religious or Philosophical Beliefs, Sex Life or Sexual Orientation, data concerning health, performance data, disciplinary data</i>	<i>US</i>
<i>Provide External Counsel and Legal Support Supplier Management</i>	<i>Provide non-advisory legal support related to the management of external counsel and other legal support suppliers.</i>	<i>Employees/non-employees</i>	<i>Name, employee ID</i>	<i>India, US</i>

<i>Manage Corporate Governance and External Relations</i>	<i>The processes related to developing strategy and managing relationships with external stakeholders, including investors, regulators, communities, and external auditors. Parent Processes (L2) under this Process Group (L1) include Investor Relations (Equity and Fixed Income), Shareholder Relationship Management, Sustainability &amp; ESG Management, Corporate Strategy Development, Community Relations Investing Development and Management, Regulatory and Government Relations Management, External Audit Support and Management, and Internal Audit Execution Management and Support.</i>	<i>Employees/non-employees</i>	<i>Name, employee ID</i>	<i>Philippines, US</i>
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**Internal Audit**

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<b>Assurance</b>	<i>The role of Internal Audit is to provide independent, objective, reliable, valued and timely assurance to the Boards of Directors of Citigroup and Citibank, the Audit Committees, senior management and regulators regarding the effectiveness of governance, risk management, and controls that mitigate current and evolving risks and enhance the control culture within Citigroup and Citibank. The scope of Internal Audit's work is focused on evaluating and contributing to the improvement of governance, risk management, and control processes using a systematic and disciplined approach. When required, Internal Audit may perform special investigations and reviews, and undertake work required by Citigroup's and/or Citibank's regulators. IA provides additional services to support its assurance activities, including Quality Assurance (independent assurance that IA has achieved and is maintaining appropriate standards of delivery when measured against its own and industry standards), as well as the necessary tools, processes, information and audit analytics required to complete assurance work</i>	<i>Citi Workers; Prospective Employees</i>	<i>Name;- Mother's Maiden Name;- Business Mailing Address;- Personal Mailing Address;- Date of Birth;- Date of Death;- Marital Status;- Place of Birth;- Citizenship Status;- Education History;- Work Telephone #, Fax #, Mobile #;- Personal Telephone #, Fax #, Mobile #;- Email Address;- URLs or IP Address;- License or Vehicle Identifiers;- SSN (Social Security #) or other Government ID # (If other, please specify in comments);- Authentication Credentials (e.g., SOEID, GUID, Employee ID);- Employment History;- Age;- Gender;- Credit or Debit Card Number or Data Transactions;- Electronic Signature;- Financial Information or Transactions;- Account Identifiers Used in Funds Transfer (e.g. Bank Identifier Code [BIC/SWIFT], CHIPS);- ATM history;- Authorized user information;- Payment history</i>	<i>My Audit main service location in United States.  Countries with IA staff with access to My Audit: Australia, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US</i>

**Wealth**

<b>Processing Activity</b>	<b>Process Description</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<i>Account Maintenance</i>	<i>The processes involved in making any modifications in the account details including account type changes, account owner details changes, account transfers, credit line adjustments, fee changes or freezes and account package conversions. In addition, the processes also cover the monitoring</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>India, Singapore US</i>

	<i>of account activity and reporting any pre-defined key metrics at the account level as applicable</i>			
<i>Account Opening and Set Up</i>	<i>The processes supporting the opening of a new account for a new or existing Customer. These processes include ensuring all critical documents and requirements are accurately requested, received and processed, all established governance controls are passed prior to account activation and the existing relationship of customers are holistically recognized and logged</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>India, Singapore US</i>
<i>Account, Portfolio Monitoring and Reporting</i>	<i>The processes supporting the continuous monitoring of account activity and the entire portfolio for risk related triggers with respect to account portfolio concentration and the risk profile</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>India, Singapore US</i>
<i>Collateral and Margin Management</i>	<i>The processes involved in granting, verifying, managing and monitoring collateral in order to reduce credit risk in financial transactions. In addition, the processes cover the calculation, resolution and management of margin calls</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>Singapore, US</i>
<i>Customer and Account Record Management</i>	<i>The processes supporting the management of client and account records to ensure accuracy, completeness and consistency of the information maintained</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>Singapore, US</i>
<i>Liquidity Risk</i>	<i>The risk that Citi will not be able to efficiently meet both expected and unexpected current and future cash flows and collateral needs without adversely affecting either daily operations or financial condition of Citi.</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>Singapore, US</i>
<i>Perform Financial Reporting</i>	<i>Processes related to the generation of financial statement reports (statutory financial reports) and regulatory financial reports</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>India, Singapore, US</i>
<i>Product Management</i>	<i>The processes related to the management and oversight of products such as product onboarding, the management of benefits, rewards, and promotions, vendor discounts procedures, claims processing etc.</i>	<i>Employees</i>	<i>SOEID, name,</i>	<i>Singapore, US</i>

### Security Services

<b>Processing Activity</b>	<b>Purposes of the processing</b>	<b>Categories of data subjects</b>	<b>Categories of personal data (not limited to)</b>	<b>International Transfer Destination</b>
<i>Investigations and Investigations Intake</i>	<i>CSIS conduct independent global investigations with the aim to identify fraud and related wrongdoing, recover lost or stolen assets, identify underlying control failures and root causes, enforce the policies of the firm or in support of Law Enforcement requests.</i>	<i>Employees, non-employees, former Workers</i>	<i>Advertising identifiers (e.g. IDFA, Android Advertising ID [GAID]) Alias Cookie identifier Device make/model Device serial number IP Address International Mobile Equipment Identity (IMEI) Media Access Control (MAC) Address Check-in data Clickstream/web browsing data (e.g. browsing history, time spent on website, cross-site tracking) Inferences based on personal information Likes and interests</i>	<i>South Africa</i>

		<p> <i>Location derived from IP address</i>  <i>Loyalty program membership</i>  <i>Network location</i>  <i>Precise GPS location</i>  <i>Social media account information (e.g. account name, account handle, URL)</i>  <i>Transactional data (e.g. Purchase history)</i>  <i>Web beacon</i>  <i>Zip code or postal code</i>  <i>ATM history</i>  <i>Account Identifiers Used in Funds Transfer (e.g. Bank Identifier Code [BIC/SWIFT], CHIPS)</i>  <i>Alternative family member information</i>  <i>Authorized user information</i>  <i>Beneficiary information</i>  <i>Checking, Savings, Retirement or other Financial Account Numbers</i>  <i>Credit Reports, Credit Scores, Fraud Alerts</i>  <i>Credit or Debit Card Number or Data Transactions</i>  <i>Details of Personal Assets (e.g. property)</i>  <i>Electronic Signature</i>  <i>Financial Information or Transactions</i>  <i>Guarantor information</i>  <i>Payment history</i>  <i>Personal Income</i>  <i>Security word</i>  <i>Unique identifier</i>  <i>Virtual Currency holdings (e.g. Cryptocurrency)</i>  <i>Claims Data or Records</i>  <i>Dates related to an individual (i.e., birth, death, admission, discharge, ages over 89)</i>  <i>Full-face Photographic Images or any Comparable Images</i>  <i>Health Plan or Beneficiary Data</i>  <i>License or Certificate Data</i> </p>	
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			Records or Account #s Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID) Business Mailing Address Citizenship Status Date of Birth Date of Death Education History Email Address Employment History Name or Initial Gender Gender Identity License or Vehicle Identifiers Marital Status Military History Mother's Maiden Name Personal Mailing Address Personal Telephone #, Fax #, Mobile # Place of Birth SSN (Social Security #) or other Government ID # (If other, please specify in comments) URLs or IP Address Work Telephone#, Fax#, Mobile#, Background Check Data Data Concerning Health	
<i>Crisis Management</i>	<i>Crisis management is the process of preparing for, responding to, and recovering from sudden events that threaten an organization's operations or survival. It involves identifying potential threats, mounting effective responses, and planning how to deal with crises to minimize impact. These events can include e.g. war, natural disasters or cyberattacks.</i>	<i>Employees Non-Employees, former Workers</i>	Device make/model Device serial number Full-face Photographic Images or any Comparable Images Name or Initial Mother's Maiden Name URLs or IP Address	<i>Costa Rica, India, Singapore, US</i>
<i>Physical Security - CCTV</i>	<i>Closed-circuit television (CCTV), also known as video surveillance, is the use of closed-circuit television cameras to transmit a signal to a specific place on a limited set of monitors. The system consists of a digital recorder (DVR) and cameras that are installed in different critical building areas e.g. entrances and vault areas. The purpose is to comply with local regulations and observe the facility for protecting the Citi properties and workers from crime, crisis situations.</i>	<i>Employees, Non-Employees, former Workers</i>	Device make/model Device serial number Full-face Photographic Images or any Comparable Images Name or Initial	<i>Costa Rica, India, US</i>

**Risk**

Processing Activity	Purposes of the processing	Categories of data	Categories of personal data (not	International Transfer
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		<b>subjects</b>	<b>limited to)</b>	<b>Destination</b>
Perform Contingency Funding Plan Approval	To review Risk staff location for COB and needed funding approval	Employees	Name, employee ID, Work location	US

### Independent Compliance Risk Management (ICRM)

Processing Activity	Purposes of Processing	Categories of Data Subjects	Categories of Personal Data (not limited to)	International Transfer Destination
Design and Manage Electronic Communications	Provide severity assessments for confirmed off-channel violations, validate communication strategy and authorization for internal lines of business, oversee off-channel quarterly attestation and reporting, prepare off-channel disciplinary reporting, and manage the Electronic Communications Governance Forum.	Employees, Non-Employees	Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address; Email Address; Name or Initial; Work Telephone #, Fax #, Mobile #; Social Media Account; Unapproved Communication Channels	US
Design and Manage Mandatory Absence Framework for Sensitive Positions	The process to develop mandatory absence framework and minimum standards for persons in sensitive positions in accordance with regulatory requirements.	Employees, Non-Employees	Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address; Email Address; Name or Initial;	Costa Rica; Hong Kong; India; Mexico; Singapore
Design and Manage Personal Trading and Investments Framework	The process to set a framework of minimum standards within which covered persons and Citi access persons must conduct their personal investment and trading activities, to review preclearance trade requests, and to monitor covered person's brokerage or trading accounts.	Employees, Non-Employees; Former Employees	Account Holder Name; Brokerage statements; Checking, Savings, Retirement or other Financial Account Numbers; Details of Personal Assets (e.g. property); Financial Information or Transactions; Transactional data - Brokerage accounts; Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Name or Initial; Marital Status; Personal Mailing Address	Costa Rica; Hong Kong; India; Mexico; Philippines; Singapore
Execute eCommunication Surveillance	The process to review employee written electronic and voice communications (internal and external) to detect, escalate, and mitigate potential market abuse and anti-competitive behavior, improper use of material non-public information, and improper sharing of client information.	Employees, Non-Employees;	Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address; Email Address; Name or Initial; Work Telephone #, Fax #, Mobile #	Australia; China; Costa Rica; Hong Kong; India; Malaysia; Mexico; Philippines; Singapore; Vietnam
Manage Individual Registrations and Licensing	The process to measure, monitor, control, report and obtain regulatory approval for roles and certifications to comply with regulatory requirements of the applicable regulatory body and in accordance with the enterprise risk management framework, to permit Citi personnel to engage in specified business activities.	Employees	Age; Alias; Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address; Citizenship Status; Date of Birth; Education History; Email Address; Employment History; Name or Initial; Gender; Personal Mailing Address; Personal Telephone #, Fax #, Mobile #; Place of Birth; SSN (Social Security #) or other Government ID # (If other, please specify in comments); Work Telephone #, Fax #, Mobile #; Credit Reports, Credit Scores, Fraud Alerts; Electronic Signature; Transactional data - Brokerage accounts; Biometric Identifiers; Background Check Data;	Hong Kong; India; Mexico; Singapore
Manage Trade Surveillance	The process of sampling and reviewing trade orders and trade executions to deter potential aberrant activities and deviations from Citi policies, standards,	Employees, Non-Employees	Financial Information or Transactions; Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address;	Australia; China; Costa Rica; Hong Kong; India; Malaysia; Mexico; Philippines; Singapore;

	<i>procedures, or applicable laws, rules, and regulations. The aim of trade surveillance is to detect, prevent, and deter; market abuse, client abuse, inappropriate sales practices, and suitability misconduct arising from employees, Citi, or client activities. The potential risk when identified is measured and escalated.</i>		<i>Email Address; Name or Initial; Personal Telephone #, Fax #, Mobile #; Work Telephone #, Fax #, Mobile #</i>	<i>Vietnam</i>
<i>Manage Money Laundering Risk</i>	<i>The process includes applying risk management practices, frameworks, and guidance across Citi's business lines and geographies to identify, mitigate and escalate money laundering risk in accordance with Citi's Global AML Policy and Standards.</i>	<i>Employees, Non-Employees</i>	<i>All PII categories as per data classification policy</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mexico, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Compliance Training Program Development and Implementation</i>	<i>This process consists of the below key activities: a. Identify and document training needs and an annual training plan that incorporates relevant U.S. State and Federal laws and regulations, b. Development of content for training courses referencing relevant U.S. State and Federal laws and regulations and develop a plan for deployment, c. Provide oversight of the training courses referencing U.S. State and Federal laws and regulations, including criteria and methodology for the evaluation of effectiveness of select courses, d. Identification of changes required to training courses based on impending publicly-announced changes to state and federal laws and regulations, e. Training of relevant staff on the Compliance Risk Appetite Statement and framework.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Costa Rica, India, Malaysia, Mexico, Philippines, US</i>
<i>Design and Manage Policy Governance Framework</i>	<i>The process to define and oversee policy governance minimum standards including pre-vetting, review, and approval of policy documents as well as analysis and reporting of policy waivers, dispensations, and breaches to senior management.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Costa Rica, India, Malaysia, Mexico, Philippines, US</i>
<i>Implement Policy Governance Framework</i>	<i>The process to implement policy governance minimum standards including socialization, periodic review, waivers, dispensations, and breach remediation.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mauritius, Mexico, Monaco, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>
<i>Compliance Risk Assessment</i>	<i>Compliance Risk Assessments are the evaluation of inherent compliance risk, which is the risk that an activity would pose if no controls or mitigating factors were in place, and the determination of residual risk, which is the level of risk after controls are considered.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>India, US</i>

	<i>Compliance Risk Assessments are a mechanism to enable management to identify, measure, monitor, and control key compliance risks facing the Firm and drive management decisions to operate within the Firm's Compliance Risk Appetite. Compliance Risk Assessments are integrated with Compliance Testing, Monitoring, and Risk Appetite such that the outputs from each program inform the actions and/or improvements in the others. Compliance risk assessments align enterprise-wide Compliance Monitoring, Compliance Testing and Surveillance and inform scope and frequency of these assessment activities.</i>			
<i>Financial Crimes Compliance Risk Assessments</i>	<i>Compliance Risk Assessments are the evaluation of inherent compliance risk, which is the risk that an activity would pose if no controls or mitigating factors were in place, and the determination of residual risk, which is the level of risk after controls are considered. Compliance Risk Assessments are a mechanism to enable management to identify, measure, monitor, and control key compliance risks facing the Firm and drive management decisions to operate within the Firm's Compliance Risk Appetite. Compliance Risk Assessments are integrated with Compliance Testing, Monitoring, and Risk Appetite such that the outputs from each program inform the actions and/or improvements in the others. Compliance risk assessments align enterprise-wide Compliance Monitoring, Compliance Testing and Surveillance and inform scope and frequency of these assessment activities.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>India, US</i>
<i>Compliance Risk Metrics Identification and Threshold Development</i>	<i>This process consists of the following key activities: a. Process of selecting quantitative data sets for use in measuring compliance risk, b. Process of determining a specific value within a compliance risk metrics data set for use in comparing metric behavior relative to that specific value, c. Process of comparing and adjusting thresholds to ensure standardized measurements in compliance risk metrics.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>India, US</i>
<i>Execute Compliance Independent Assessments</i>	<i>The process to assess, monitor and test significant compliance risk as detailed in the compliance independent assessment procedure, to evaluate compliance with applicable laws, rules, and regulations as well as associated internal policies.</i>	<i>Employees, Non-Employees; Former Employees</i>	<i>Employee National ID Number, Social Security Number, Direct Manager Name/Role/Department/Phone, Account Code, Age, Alien Registration Number, Base Pay, Business Title, Category/Local Grade, Citibank MO Code, Citizenship Status/Nationality, Classification, Compensation Frequency, Compensation Rate Amount, Continuity of Business Related Data (e.g. how to contact individuals in case of an emergency), Contract Type, Credit Card Expiration Date, Credit Card</i>	<i>Australia, Bahrain, Chile, China, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Hong Kong, India, Indonesia, Kenya, Malaysia, Mauritius, Mexico, Monaco, Nigeria, Pakistan, Panama, Paraguay, Philippines, Singapore, South Africa, Taiwan, Thailand, Turkey, UAE, US, Vietnam</i>

		<p><i>Holder Name, Credit Card Service Code, Credit History, Currency Code, Date Hire, Date of Birth, Department Entry Date, Department ID, Dependent/Beneficiary Address, Dependent/Beneficiary Date Of Birth, Dependent/Beneficiary Entitlement to Medicare, Dependent/Beneficiary Gender, Dependent/Beneficiary ID, Dependent/Beneficiary Marital Status, Dependent/Beneficiary Name, Dependent/Beneficiary National ID, Dependent/Beneficiary Relationship, Dependent/Beneficiary Telephone Number, Device ID, Device IP Address, Digitized or Electronic Signature, Driver's License or Non-Driver Identification Number, Earning Distribution Type, Education History, Effective Date, Emergency Contact Information, Employment Begin Date, Employment End Date, Identification Card, Gender, Global Employee ID, Grade Entry Date, Home Facsimile Number, Home Postal Address, Home Telephone Number, Insurance Claim History, Job Action, Job Code, Job Entry Date, Labor Agreement, Leave of Absence, List of Benefits Plans, Local Department ID, Marital Status, Mobile Telephone Number, Mother's Maiden Name, Name, Officer Code, Other Government-Issued Identification Number (e.g. country-identification), Overtime Eligibility, Parents/Other Family Members, Passport/Visa Number, Pay Grade, Pay Group, Personal E-Mail Address, Photographs, Place of Birth, Political Opinions, Primary Credit Card Account Number, Prior Employer, Prior Employment Compensation Rate Code, Prior Employment Country, Prior Employment Currency Code, Prior Employment End Date, Prior Employment Other Pay, Prior Employment Pay Frequency, Prior Employment Sequence Number, Prior Employment Start Date, Professional License/Certification Number, Reason Code, Record, Regular Shift, Regulator Region, Religious Beliefs, Review Date, Review Period From, Review Period To, Review Period To, Review Rating, Salary Administration Plan, Salary History, Signature Date, Signature Date, Standard Hours, Standard Work Period, Status (Reg/Temp/FullTime/PartTime), Tax Location Code, Tipped, Type, Vacation Days, Video Recording, Voice Print, Voice Recording, Volunteer Activities and Citigroup Related Charitable Gift Giving, Work E-Mail Address, Work</i></p>	
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<p><i>Design and Manage Compliance Independent Assessment Program</i></p>	<p><i>The process to develop and maintain compliance independent Assessment risk-based procedure, training, technology, reporting, analysis, and oversight, in conformance with applicable laws, rules, regulations, and internal policies, to support consistent execution of compliance independent assessment activities.</i></p>	<p><i>Employees, Non-Employees; Former Employees</i></p>	<p><i>Employee</i>  <i>National ID Number, Social Security Number, Direct Manager Name/Role/Department/Phone, Account Code, Age, Alien Registration Number, Base Pay, Business Title, Category/Local Grade, Citibank MO Code, Citizenship Status/Nationality, Classification, Compensation Frequency, Compensation Rate Amount, Continuity of Business Related Data (e.g. how to contact individuals in case of an emergency), Contract Type, Credit Card Expiration Date, Credit Card Holder Name, Credit Card Service Code, Credit History, Currency Code, Date Hire, Date of Birth, Department Entry Date, Department ID, Dependent/Beneficiary Address, Dependent/Beneficiary Date Of Birth, Dependent/Beneficiary Entitlement to Medicare, Dependent/Beneficiary Gender, Dependent/Beneficiary ID, Dependent/Beneficiary Marital Status, Dependent/Beneficiary Name, Dependent/Beneficiary National ID, Dependent/Beneficiary Relationship, Dependent/Beneficiary Telephone Number, Device ID, Device IP Address, Digitized or Electronic Signature, Driver's License or Non-Driver Identification Number, Earning Distribution Type, Education History, Effective Date, Emergency Contact Information, Employment Begin Date, Employment End Date, Identification Card,</i></p>	<p><i>India, Mexico, US</i></p>
<p><i>Design and Manage Compliance Independent Assessment Program - Risk</i></p>				

		<p><i>Gender, Global Employee ID, Grade Entry Date, Home Facsimile Number, Home Postal Address, Home Telephone Number, Insurance Claim History, Job Action, Job Code, Job Entry Date, Labor Agreement, Leave of Absence, List of Benefits Plans, Local Department ID, Marital Status, Mobile Telephone Number, Mother's Maiden Name, Name, Officer Code, Other Government-Issued Identification Number (e.g. country-identification), Overtime Eligibility, Parents/Other Family Members, Passport/Visa Number, Pay Grade, Pay Group, Personal E-Mail Address, Photographs, Place of Birth, Political Opinions, Primary Credit Card Account Number, Prior Employer, Prior Employment Compensation Rate Code, Prior Employment Country, Prior Employment Currency Code, Prior Employment End Date, Prior Employment Other Pay, Prior Employment Pay Frequency, Prior Employment Sequence Number, Prior Employment Start Date, Professional License/Certification Number, Reason Code, Record, Regular Shift, Regulator Region, Religious Beliefs, Review Date, Review Period From, Review Period To, Review Period To, Review Rating, Salary Administration Plan, Salary History, Signature Date, Signature Date, Standard Hours, Standard Work Period, Status (Reg/Temp/FullTime/PartTime), Tax Location Code, Tipped, Type, Vacation Days, Video Recording, Voice Print, Voice Recording, Volunteer Activities and Citigroup Related Charitable Gift Giving, Work E-Mail Address, Work Facsimile Number, Work Location, Work Postal Address, Work Schedule, Work Telephone Number, Facility Guarantor's GFCID, GFCID, Imaged Documentation - Employee's signature on receipts, Last 4 Digits Employee Social Security</i></p> <p><i>Vendor Employee National ID Number, Social Security Number, Age, Alien Registration Number, Citizenship Status/Nationality, Digitized or Electronic Signature, Driver's License or Non-Driver Identification Number, Gender, Home Facsimile Number, Home Postal Address, Home Telephone Number, Marital Status, Mobile Telephone, Mother's Maiden Name, Name, Passport/Visa Number, Personal E-Mail Address, Place of Birth, Work E-Mail Address, Work Facsimile Number, Work Postal Address, Work Telephone Number,</i></p>	
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			Images of Citi Contracts with Vendor, Last 4 Digits Social Security Number, Vendor Company Name, Vendor Corporate Address	
Design and implement Regulatory Management Framework	The process to design the Regulatory Management Framework in compliance with the Regulations, and implement minimum standards including impact assessment of regulatory changes, and mapping applicable laws, rules, and regulations to impacted product lines, and functional areas within Citi for implementation of activities governed by regulations. This process is not applicable to activities related to financial regulatory reporting.	Employees, Non-Employees; Former Employees	Name, Citi Email, SOEID, GEID	Singapore, South Africa, US
Design and Manage Outside Directorships and Business Interests Framework	The process to set a framework for disclosure of employee outside business activities and to review approval requests.	Employees, Non-Employees	Employee (FTE/TEMP) Work Telephone Number; Work E-Mail Address; Global Employee ID; Date Hire; Business Title; Department ID; Classification; Category/Local Grade; Work Location; Citibank MO Code; Account Code; Contract Type; Direct Manager Name/Role/Department/Phone; RITS ID	Costa Rica, Hong Kong, India, Philippines
Design and Manage Public-Private Information Barriers Framework	The process to establish a framework and minimum standards for the appropriate handling of material, nonpublic information, and, where applicable, inside information, to establish information barriers for the protection of client sensitive data and adherence to securities or market abuse laws.	Employees, Non-Employees	Financial Information or Transactions; Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID); Business Mailing Address; Date of Birth; Email Address; Name or Initial; Personal Mailing Address; Personal Telephone #, Fax #, Mobile #; SSN (Social Security #) or other Government ID # (If other, please specify in comments); Work Telephone #, Fax #, Mobile #	Australia; Hong Kong; India; Mexico; Singapore
Implement Conflicts of Interest Mitigation Program	The process to implement and embed the global conflicts of interest standards related to Citi's products, services, and operations to meet regulatory expectations.	Employees, Non-Employees	Employee (FTE, TEMP) Name; RITS ID	US
Implement Legal Entity Regulated Activities	The process to identify, measure, monitor, control, and report adherence to the minimum standards for Legal Entity Regulated Activities (LERA), including but not limited to bank affiliate transactions, insider lending, debts previously contracted assets, by implementing firm-wide tracking of key risk indicators, control performance exceptions/failures, policy breaches, violations of law, and remediations thereof, for timely and effective management actions to manage prudential and regulatory risks and to comply with applicable laws, rules, and regulations.	Employees, Non-Employees	Account Holder Name Alternative family member information Authorized user information Checking, Savings, Retirement or other Financial Account Numbers Credit or Debit Card Number or Data Transactions Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID) Business Mailing Address Citizenship Status Date of Birth Name or Initial Personal Mailing Address SSN (Social Security #) or other Government ID # (If other, please specify in comments) Details of financial interests of family members, to the extent required under local laws in the relevant jurisdictions	Hong Kong, India, Singapore, UAE

<p><i>Design and Manage Legal Entity Regulated Activities Compliance Program</i></p>	<p><i>The process to define and document accountability and minimum standards for Legal Entity Regulated Activities (LERA) including but not limited to identifying potential prudential and regulatory risks, controlling the risks associated with transactions between Banks and Affiliates, and insider loans, and overseeing assets acquired or owned in connection with lease financial transactions and swaps security-based swaps activities to prevent and detect policy breaches and/or violations of law, and aggregated reporting to regulators.</i></p>	<p><i>Employees, Non-Employees</i></p>	<p><i>Account Holder Name Alternative family member information Authorized user information Checking, Savings, Retirement or other Financial Account Numbers Credit or Debit Card Number or Data Transactions Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID) Business Mailing Address Citizenship Status Date of Birth Name or Initial Personal Mailing Address SSN (Social Security #) or other Government ID # (If other, please specify in comments) Details of financial interests of family members, to the extent required under local laws in the relevant jurisdictions</i></p>	<p><i>Hong Kong, India, Singapore, UAE</i></p>
<p><i>Design and Manage Conflicts of interest Mitigation Program</i></p>	<p><i>The process to design and manage the Conflicts of Interest Framework and establish minimum standards to manage conflicts that may exist or arise with and among Citi, its employees, third parties, clients, and counterparties to meet regulatory obligations.</i></p>	<p><i>Employees, Non-Employees</i></p>	<p><i>Employee (FTE, TEMP) Name; RITS ID</i></p>	<p><i>US</i></p>
<p><i>Provide Regulatory Advice</i></p>	<p><i>The process to provide Compliance advice, and when needed, credible challenge of business and functions activities including risk and control self-assessment, issue management, assessment of Compliance Risk, escalations, new activities, and third-party engagement, to stay compliant with applicable laws, rules, and regulations and to mitigate risk.</i></p>	<p><i>Employees, Non-Employees</i></p>	<p><i>Applicant / Non-Employee Background Check Data Applicant / Non-Employee Personal E-Mail Address Employee Home Telephone Number Infrastructure Related Details Notes to Approver Notes to Buyers Applicant / Non-Employee Name Applicant Name Client Name of a Corporate Customer Company Name Contractor Company Name Contractor Name Contractor Prior Employer Corporate Customer Account Name Corporate Customer Bank Account Name Corporate Customer Bank Account Type Customer Bank Account Name Customer Citizenship Status/Nationality Customer Name Customer Reference Tables (e.g., GFCIDs, Name, Address, Account) Data collected contains corporate financial information that is available publicly and does not identify a natural person in any capacity Direct Manager Name/Role/Department/Phone Director/Beneficial Owner Information</i></p>	<p><i>Australia; China; Hong Kong; India; Mexico; Philippines</i></p>

			<p> <i>Employee Base Pay</i>  <i>Employee Business Title</i>  <i>Employee Category/Local Grade</i>  <i>Employee Classification</i>  <i>Employee Compensation Frequency</i>  <i>Employee Compensation Rate Amount</i>  <i>Employee Continuity of Business Related Data (e.g. how to contact individuals in case of an emergency)</i>  <i>Employee Contract Type</i> </p> <p> <i>Employee Currency Code</i>  <i>Employee Date Hire</i>  <i>Employee Department Entry Date</i>  <i>Employee Department ID</i>  <i>Employee Earning Distribution Type</i>  <i>Employee Effective Date</i>  <i>Employee Emergency Contact Information</i>  <i>Employee Employment Begin Date</i>  <i>Employee Employment End Date</i>  <i>Employee Global Employee ID</i>  <i>Employee Grade Entry Date</i>  <i>Employee Highest Education Level</i>  <i>Employee Job Action</i>  <i>Employee Job Code</i>  <i>Employee Job Entry Date</i>  <i>Employee Leave of Absence</i>  <i>Employee Local Department ID</i>  <i>Employee Mobile Telephone Number</i>  <i>Employee Name</i>  <i>Employee Officer Code</i>  <i>Employee Overtime Eligibility</i>  <i>Employee Pay Grade</i>  <i>Employee Pay Group</i>  <i>Employee Photographs</i>  <i>Employee Prior Employer</i>  <i>Employee Reason Code</i>  <i>Employee Record</i>  <i>Employee Regular Shift</i>  <i>Employee Regulator Region</i>  <i>Employee Review Date</i>  <i>Employee Review Period From</i>  <i>Employee Review Period To</i>  <i>Employee Review Rating</i>  <i>Employee Salary Administration Plan</i>  <i>Employee Salary History</i>  <i>Employee Standard Hours</i>  <i>Employee Standard Work Period</i>  <i>Employee Status (Reg/Temp/FullTime/PartTime)</i> </p>	
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			<p>Employee Type  Employee Vacation Days  Employee Work E-Mail Address  Employee Work Location  Employee Work Postal Address  Employee Work Postal Address of a Vendor  Employee Work Schedule  Employee Work Telephone Number  Facility Guarantor's GFCID  GFCID  Imaged Documentation - Approver's signature, name and title  Imaged documentation - employee's signature  Imaged Documentation - Employee's signature on receipts  Main E-Mail Address of a Corporate Client  Main Telephone Number of a Corporate Client  Number of AML Alerts &lt; 30 days  Number of AML Alerts &gt; 30 days  Number of Investigations Closed  Number of Investigations Open  Obligor City  Obligor GFCID  Obligor GFCID Name  Obligor GFCID Number  Obligor Guarantor's GFCID  Obligor Guarantor's TIN  Obligor Name/Counterparty  Obligor Postal Code  Obligor State  Obligor Street Address  Postal Address of a Corporate Client  Postal Address of a Corporate Customer  Vendor Company Name  Vendor Corporate Address</p>	
Compliance Risk Reporting	This is a periodic reporting process, where key existing and emerging enterprise wide risk intelligence, at a global level, is communicated to Citi Board and Senior Management for the purposes of executive governance, oversight and risk management. E.g. the quarterly State of Compliance report to the Citi Board or to the Senior Management at Country/Region/Business/Function Management level for the purposes of BAU governance, oversight and risk management. E.g. the BRCC reports at Country/Region/Business/Function levels.	Employees, Non-Employees	SOEID, Citi email address, Name, passport details, trade activity, outside business interests,	ICRM CAO Service Provider Locations: Australia; Costa Rica; Hong Kong; India; Malaysia; Mexico; Philippines; Singapore; US  Coverage and service recipients ICRM Global

<i>Compliance Risk Reporting Oversight</i>	<i>This is a periodic reporting process, where key existing and emerging enterprise wide risk intelligence, at a global level, is communicated to Citi Board and Senior Management for the purposes of executive governance, oversight and risk management. E.g. the quarterly State of Compliance report to the Citi Board or to the Senior Management at Country/Region/Business/Function Management level for the purposes of BAU governance, oversight and risk management. E.g. the BRCC reports at Country/Region/Business/Function levels.</i>	<i>Employees, Non-Employees</i>	<i>SOEID, Citi email address, Name, passport details, trade activity, outside business interests,</i>	<i>ICRM CAO Service Provider Locations: Australia; Costa Rica; Hong Kong; India; Malaysia; Mexico; Philippines; Singapore; US  Coverage and service recipients ICRM Global</i>
<i>Develop and Manage Master Records Catalog and Country Retention Schedules</i>	<i>This process consists of managing Citi's retention schedules, oversight of impact assessment monitoring related to retention schedule changes, and also includes regulations mapping of applicable LRRs to Citi's retention schedules.</i>	<i>Current, Prospective and Former Employees, Non-Employees, Workers</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Columbia, Costa Rica, Nigeria, Philippines, Kenya, Singapore, South Africa, Thailand, UAE, US</i>
<i>Design and Manage Fair Lending Program</i>	<i>The process to design and manage the Fair Lending and Fairness enterprise compliance program to prohibit discrimination in Citi's credit transactions including residential real-estate loans through stakeholder training, defining the methodology, templates and tools used to manage the risk, evaluation of model compliance, and ongoing monitoring and assessments of the program to comply with laws, rules, and regulations.</i>	<i>Current, Prospective and Former Employees, Non-Employees, Workers</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Columbia, Costa Rica, Nigeria, Philippines, Kenya, Singapore, South Africa, Thailand, UAE, US</i>
<i>Design and Manage Privacy Compliance Risk Management Program</i>	<i>The process to design and Manage enterprise privacy compliance risk management program, including defining expectations for privacy and responsible handling of data to enable compliance with privacy laws, rules, and regulations and to manage privacy risk across the lines of defense.</i>	<i>Current, Prospective and Former Employees, Non-Employees, Workers</i>	<i>Name, Citi Email, SOEID, GEID</i>	<i>Columbia, Costa Rica, Nigeria, Philippines, Kenya, Singapore, South Africa, Thailand, UAE, US</i>
<i>Manage Bribery Risk</i>	<i>The process to identify, measure, monitor and report on bribery risk across the firm in accordance with Citi's risk management practices and the Citi Anti-Bribery &amp; Corruption Policy.</i>	<i>Current, Prospective and Former Employees, Non-Employees, Workers</i>	<i>Authentication Credentials (e.g., SOEID, GEID, RITS, Employee ID) Name or Initial</i>	<i>India, Malaysia, Mexico, Singapore, US</i>