



## PRIVACY STATEMENT

### **CLOSED AND DIVESTED RETAIL BANK OPERATIONS: Information regarding the processing of your personal data by Citibank Greece**

This Privacy Statement explains how Citibank Greece processes (for limited purposes) personal data from its former retail clients in respect of its closed or divested consumer banking, investment and other retail bank operations, providing the required information regarding the processing of your personal data by Citibank Greece, pursuant to the Regulation 2016/679/EU on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**General Data Protection Regulation**), widely known as “GDPR”, coming into effect as of 25 May 2018.

Divested retail banking operations mean deposits, loans, credit cards, wealth management and other retail bank products that Citibank Greece has transferred to other banks or financial institutions or other eligible transferees (e.g. securitisation SPVs). In this context, it is noted that effective from 1 October 2014, Citibank Greece transferred its retail banking business in Greece, including its branch network, deposits, wealth management business and lending products to Alpha Bank S.A. (**Alpha Bank**) and, as of the abovementioned date, has ceased its retail banking business in Greece. Closed retail banking operations mean deposits, loans, credit cards, wealth management and other retail bank products that had been closed prior to the 1<sup>st</sup> of October 2014, as well as any non-transferred deposit accounts, investment accounts and/or safe deposit boxes which remain outstanding and are still held with Citibank Greece.

To the extent that you held or continue to hold any products of above closed or divested retail bank operations of Citibank Greece (**Closed and Divested Products**, respectively), we may still be entitled to hold and process your relevant personal data.

Unless otherwise agreed with you or required by applicable law, the type of processing which Citibank Greece conducts with respect to your Closed or Divested Products, is limited to the storage of your personal data.

This Privacy Statement contains information on how we process your data and about exercising your data protection rights and becomes effective as of 25 May 2018.

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

**1.1** It applies if you are a Client (natural person) of the former retail banking business of Citibank Greece, or a person associated with a client (natural person or legal entity) of the former retail banking business of Citibank Greece (indicatively, shareholder, management member, legal representative, authorised signatory, employee, attorney, heir etc.) or with a Closed or Divested Product (indicatively, guarantor, grantor of any other security interest etc.).

Data Controller	Country
Citibank Europe plc (Greek Branch)	Greece

#### **1.2 Full details of Citibank Greece**



CITIBANK EUROPE PUBLIC LIMITED COMPANY (**Citibank Europe plc**) is a credit institution incorporated in accordance with the laws of Ireland as a public limited company (company registry number 132781) and licensed by the Central Bank of Ireland, under reference number C26553. Citibank Europe plc has its registered office in Dublin, Ireland (1 North Wall Quay, Dublin 1, Ireland) and is subject to supervision by the Central Bank of Ireland (New Wapping Street, North Wall Quay, Dublin 1, Ireland, PO Box 559, [www.centralbank.ie](http://www.centralbank.ie)).

Citibank Europe plc is the universal successor of Citibank International Limited (formerly Citibank International plc).

Citibank Europe plc is lawfully established in Greece through branch, duly registered with the General Commercial Registry (GEMI) under GEMI number 136957160001, with registered office in Athens (8 Othonos, 105 57 Athens) and tax registration number 997102039 of the Tax Authority FAE Athens. The Greek branch of Citibank Europe plc (**Citibank Greece**) is subject to supervision by the Central Bank of Ireland, while its activities in Greece are further subject to limited supervision by the Bank of Greece (21 Eleftheriou Venizelou, Athens) and the Capital Market Commission (1 Kolokotroni, Athens) exclusively with regard to the issues provided for by the applicable legislation.

## 2. How can you contact Citibank Greece?

### 2.1 Communication with Citibank Greece

Any communication between you and Citibank Greece, whether oral or written, will be made in the Greek language or any other language that has been agreed with you. You may contact Citibank Greece for any queries at the telephone number +30 210 3292025 or by writing to the address 8 Othonos, 105 57 Athens.

If you have any questions or requests in relation to your personal data, you may also contact the EMEA Chief Privacy Officer as follows:

#### **Data Protection Officer (Chief Data Privacy Officer - EMEA)**

33 Canada Square

London

E14 5LB

United Kingdom

Email: [Dataprotectionofficer@citi.com](mailto:Dataprotectionofficer@citi.com)

## 3. Why does Citibank Greece process your personal information?

Citibank Greece may process your personal data for the reasons set out below.

(a) Where the processing is necessary for us to perform a contract with you	i. To maintain and manage your Closed Products pursuant to that contract you contracted with Citibank Greece and to provide for closure or winding-down of transactions (that is, transactions that originated while you were still a client and have continued to date) related to a contract with us that was not transferred to Alpha Bank or any other transferee. This includes processing
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	<p>of instructions and generation of confirmations, advices and statements and the carrying out of instructions.</p> <ul style="list-style-type: none"> <li>ii. In compliance with instructions that we may receive from you (subject to any applicable blocking reason).</li> <li>iii. To allow Alpha Bank or any other transferee to whom your account or product was transferred to access your personal and transactional data records.</li> <li>iv. In compliance with instructions that we may receive from you through Alpha Bank or other transferees.</li> </ul>
<p>(b) Where we are required by Greek and EU law</p>	<ul style="list-style-type: none"> <li>i. To disclose information to governmental or regulatory authorities and entities, or other counterparties, courts or other parties (including those that imposed the blocking on your Closed Products).</li> <li>ii. To conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records in accordance with applicable regulations or from instructions from financial and prudential regulators, the prevention and prosecution of fraud, anti-money laundering (AML) and other forms of crime, prevention and measures relating to sanctions, anti-terrorism laws and regulations. This includes know your client screening (which involves identity checks and verifying address and contact details); screening of politically exposed persons (which involves screening client records against internal and external databases to establish connections to politically exposed persons or 'PEPs'); sanctions screening (which involves the screening of clients details against published sanctions lists).</li> <li>iii. For compliance with duties under any tax and other applicable laws, including under the Foreign Account Tax Compliance Act (FATCA) (including Greek Law 4493/2017 which ratified the Agreement between the government of the Hellenic Republic and the government of United States of America to improve international tax compliance and to implement FATCA) and the Common Reporting Standard (CRS) (including Greek Law 4378/2016 with respect to mandatory automatic exchange of information in the field of taxation adopting the use of CRS at European level and Greek Law 4428/2016 which ratified Greek participation in the Multilateral Competent Authority Agreement (MCAA) on automatic exchange of financial account information).</li> <li>iv. To retain record of telephone conversations and electronic communications with you, that resulted in transactions and to keep samples of your signature and handwriting.</li> </ul>

	<ul style="list-style-type: none"> <li>v. To process any claims in the United Kingdom for complaints on PPI (Payment Protection Insurance).</li> </ul>
<p>(c) Where necessary for our or a third party's legitimate interests (as listed here)</p>	<ul style="list-style-type: none"> <li>i. To monitor and analyse any use of Citibank Greece services, for risk assessment and control, for statistical and trend analysis, for compliance with IT policies and system administration, operation, testing and support, and to operate information storage systems, as the case may be.</li> <li>ii. To help detect, investigate, and prosecute fraud and other criminal activity, and share this data with Citigroup legal, compliance, risk and managerial staff to assess suspicious activities, as the case may be.</li> <li>iii. To manage our information technology and to ensure the security of our and third party storage systems.</li> <li>iv. To disclose information to and comply with instructions of relevant governmental, tax or regulatory bodies, financial markets, brokers or other intermediaries, counterparty, court, auditors or other third parties and to conduct compliance activities, in our, or someone else's interests, in connection with any transaction or instruction anywhere in the world (and specifically outside Greece) and to make such disclosures (even to the detriment of the client or its beneficiaries) to prudential regulators and other competent authorities in respect of US persons, including under the Foreign Account Tax Compliance Act, as well as pursuant to the Common Reporting Standard.</li> <li>v. To exercise or defend legal claims and in order to protect and enforce the rights, property, or safety of Citibank Greece, or to assist our clients or others to do this.</li> <li>vi. To investigate and respond to any complaints about us or our business or any incidents relating to us or our business (including Payment Protection Insurance claims in the United Kingdom) and to help maintain service quality and train staff, to deal with complaints and disputes.</li> </ul>
<p>(d) Where you consent to the processing of personal data</p>	<ul style="list-style-type: none"> <li>i. Under your directions to establish a relationship with a financial institution other than Citigroup, in which Citibank Greece or any related party may release all necessary personal data and execute all secrecy waivers and consents for disclosure and data processing required by that other financial institution.</li> <li>ii. Prior to making a distribution from the issuer of a security to shareholders, Citibank Greece may require that an interest holder provide authorization and consent.</li> <li>iii. For the purposes of providing and executing payments relating to your Closed Products.</li> </ul>

	<p>You can withdraw or revoke consents in this section (d) at any time. However, if we need your consent to process to carry out an activity, we will not be able to perform that activity or provide services and we will cease using your data for this purpose, but may continue to process your data for purposes where we have other lawful grounds to do so, such as where we are legally required to keep records of transactions. Withdrawing or revoking your consent will not affect any processing of your information which has already taken place by that date.</p>
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#### 4. Where does Citibank Greece obtain information about you?

We safeguard and store information provided to us directly by you and information learnt about you from our communications and dealings with you. We may also safeguard and store information about you obtained from others, as set out below.

(a) Our clients	<p>The individual, corporate or institutional client, you are associated with (if relevant). Our clients, who are responsible for your prior notification, may be based in the EU or outside the EU. We obtain your name, company, title and job description and contact details such as email address and telephone number or business address.</p>
(b) Public sources	<p>Sources both inside and outside the EU, such as credit reference agencies (including <a href="#">Tiresias</a>), fraud prevention agencies and outlets, professional background checking entities, international sanctions lists, any publically available databases or data sources. Data we may obtain may be shared with Citigroup Companies and include your name, gender (including any former gender), company, title and job description and contact details such as email address and telephone number or business address, details about your personal or business interests or activities.</p>
(c) Other sources	<p>Any research agencies that may have carried out research on our behalf both inside and outside the EU.</p>

#### 5. To whom does Citibank Greece disclose your personal information?

We disclose your personal information to others as follows:

- a. to Alpha Bank that acquired the former retail banking business of Citibank Greece or any other transferee that acquired former retail banking products of Citibank Greece, and with respect to your Divested Products, to the extent applicable;
- b. in case of threatened or filed litigation, Citibank Greece and Citigroup may process and exchange personal data with management and counsel;



- c. if false or inaccurate information is provided or in case of a criminal or money laundering investigation to cooperate with authorities and process and disclose personal data to any government, judicial body, or regulatory body of which your Citigroup entity is a member or is subject to that body's jurisdiction or rules;
- d. we will also disclose your information:
  - i. to our sub-contractors and persons acting as our agents who have agreed to keep your personal data strictly confidential (including those assigned with the storage of your personal data on our behalf);
  - ii. to any bank, financial institution or company to whom we may assign or transfer our rights and/or duties under our relationship (including any sub-custodian for your assets appointed by Citibank Greece); and
  - iii. if we are required or permitted to do so by applicable law, including to authorities;
- e. in case of substantial business risks and as permitted by applicable law, Citibank Greece and Citigroup may process and exchange personal data with the responsible Citigroup chief trust officer, senior risk officer, compliance officer, legal officer, tax officer, anti-money laundering officer, fraud officer, audit officer, data protection officer, control officer, Citi leadership team, and Citi managers;
- f. with management and counsel as required in order to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our clients and in order to protect the rights, property, or safety of us, our business, any Citi entities, our clients or others including to legal, tax or other professional advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
- g. to any competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction: (i) for or in connection with an examination of us by bank or other examiners; (ii) pursuant to subpoena or other legal process; (iii) at the express direction of any other authorised government agency; (iv) to our internal or external attorneys or auditors; (v) to others to whom we are required to make such disclosure by applicable law.

#### **6. Where does Citibank Greece store your personal information?**

We store your personal and financial data within our IT network, or where as and when authorized by local regulators, within secured IT virtual servers or private cloud networks and deep archive solutions, operated by Equiniti in the UK or IBM (in other European countries in respect of electronic files); and Iron Mountain (for paper files). Please note that only us, our counterparties, if applicable, and our and their financial and prudential regulators have a legal right to audit your personal or financial data.

#### **7. For how long does Citibank Greece store your personal information?**

Personal data processed in connection with your Closed or Divested Products are stored during the term in which that product remains outstanding, and also for a prudential term reflecting the statutory limitation period (20 years) or under the law governing your relevant contract.



Personal data processed in connection with a legal obligation (for example for AML purposes) shall be kept for as long as required under applicable law.

A copy of telephone recordings or electronic communications that have been kept in connection with your products will be also available to you from the date of that communication.

#### **8. What automated decision making does Citibank Greece carry out?**

There is no automated decision-making or profiling undertaken in connection with your Closed or Divested Products.

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

**9.1** You can ask us to: (a) provide a copy of your personal information; (b) correct errors or mistakes in your personal information; (c) erase your personal information after the statutory limitation period (if for error or omission we have not already disposed of your data at the end of that period); (d) transfer your personal information to other organizations; and (e) restrict processing of your personal information. These rights are limited by law.

**9.2** If you wish to exercise these rights or if you have any queries about your personal information, please contact the Data Protection Officer using the contact details in Section 2 above. If you have unresolved concerns, you have the right to complain to the relevant data protection authorities. You can bring the complaint in the Member State where you reside, where you work or where the alleged infringement of data protection law occurred.

#### **10. Changes to this Privacy Statement**

If we modify this Privacy Statement at any time we will place the modified versions on this website. We encourage you to regularly review this Privacy Statement to ensure that you are always aware of what personal information we collect and how we use, store and disclose.