



DATA PRIVACY STATEMENT

Former Employees, Dependents and Emergency Contacts

The purpose of this Privacy Statement is to describe how Citi collects, uses and otherwise processes personal information about former Citi employees who have finished their working relationship with us in accordance with the General Data Protection Regulation ('GDPR'), UK Data protection Act and other applicable laws. In addition, it describes how we process information concerning third parties whose information we may have collected from our new hires and employees, such as dependents and emergency contacts.

This Privacy Statement applies to all former Citi employees to the extent that their personal information has been collected or is used and otherwise processed in European countries¹ and the UK. When we refer to "Citi", "we" or "us" in this Privacy Statement, we are referring to entities within our group now and in the future. This includes the entities that can be found in the links on [this webpage](#).²

This Privacy Statement is non-contractual and may be amended or withdrawn at any time. We encourage you to regularly review this Privacy Statement to ensure that you are always aware of how we use and otherwise process your personal information.

What Personal Information Does Citi Process

Your "Personal Information" means any information about you as an individual that Citi collected, created, used or otherwise processed during or after your employment from which you are able to be identified. Citi normally obtains your Personal Information during the course of your employment (mostly during onboarding and on or about the time that you commence your employment with us, but also throughout the duration of your employment). In some cases, this Personal Information may also be obtained from third parties such as from references or certain background screening information. In addition, we will receive Personal Information about you from your manager and other Citi employees as well as our vendors and suppliers where relevant. During your employment with Citi there is a range of personal information that we collect, use, and create, subject to any applicable local legal requirements, and we have set out this information in Appendix 3.

¹ Europe includes: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Ireland, Jersey, Luxembourg, Monaco, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden and Switzerland.

² For the avoidance of doubt, Citi legal entities that are not incorporated in Europe are not subject to this Privacy Statement, but are subject to Citi's Binding Corporate Rules.

How Citi Will Use Your Personal Information

We will collect, receive, use, store and otherwise process your Personal Information (manually and electronically) during the course of your employment and afterwards to comply with legal obligations or to otherwise carry out our legitimate business interests as an employer and to fulfil our business interests and strategy connected with your employment in accordance with our Code of Conduct and Mission and Values Proposition and in order to meet our regulatory requirements.

For former employees it may be necessary for your Personal Information to be processed after you leave employment with Citi for a range of different purposes, in particular: to answer requests from prospective

employers for references; to handle, request or provide information relevant to pension and benefits which extend beyond your employment; in connection with your employment or the cessation of your employment; for statistical purposes or looking at trends in our workforce, such as headcount or costs or for Government or regulatory reporting; in order to assess your eligibility to be rehired by Citi; to respond to requests from tax or other regulatory authorities who make enquiries or conduct audits or investigations that relate to your employment with us; for the purpose of distribution of shares, options or company share plans; or to handle or defend current or prospective legal claims or disputes that may be brought by you or which you may be connected to.

In addition, we may need to process your Personal Information for administrative tasks, such as to manage the information that we hold about you, as part of testing, upgrading or maintaining our IT and electronic systems or physical storage, or for other administrative purposes. We may also need to access your Personal Information in order to conduct investigations, undertake other HR processes, or to action requests made by other employees that concern information that identifies you after you have left employment with us.

We have sought to be precise in providing the detailed list above. However, in an organisation as complex as Citi you will appreciate that this list may not be exhaustive, and Citi may undertake additional processing of Personal Information in line with the purposes set out above.

Citi may also process information in connection with lawsuits or for regulatory purposes and for investigations, audits or for the purposes of our Code of Conduct, limited to the relevant information strictly necessary for the purpose at hand.

In certain countries Citi may hold information concerning your family members or dependents either for the purposes of providing benefits and insurance, for example, health insurance, social benefits or allowances or for contacting them in the case of an emergency. These details will be kept solely for those purposes and will be held and retained for these reasons. To the extent applicable, this Privacy Statement applies to your family members and dependents, so please inform them about the content herein.

Where We Send Your Personal Information

First and foremost, your Personal Information was received and is stored by the legal entity within Citi that was your employer. Your employer decides the means and purpose for processing certain Personal Information about you and is therefore a data controller. However, as outlined above, we will use your Personal Information for many reasons connected with the work that you completed and our business, and in addition, because different businesses and functions work across multiple countries around the globe, your employer is not the only Citi data controller that will have access to your Personal Information. We have set out the details of Citi's main data controllers in Appendix 1.

Who Has Access to Your Personal Information

In order to provide you with the best possible visibility of who may receive your Personal Information, we have created a list below of persons who may have access to your Personal Information, aside from the legal entity that was your employer. All recipients will only have access to the relevant information that is necessary for performing their tasks (for example: benefits companies have access only to information that is strictly necessary for providing benefits and not information about work calendars or performance, etc).

The recipients of Personal Information concerning you are limited. Subject to information transferred outside of Europe (see below), they are:

- Citi's Human Resources department, including Human Resources Shared Services to the extent relevant for particular personnel to carry out their activities in connection with the processing and utilisation of Personal Information outlined in this Privacy Statement;
- Pension/provident entities, trustees, mutual benefit/insurance agents and other benefits providers to the extent this is required for the administration/provision of benefits;
- social welfare entities for taxation purposes or where such information is requested in order for you to receive benefits;
- competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction or markets, domestic or foreign, upon their request or in accordance with or as desirable in respect of any applicable law or court/tribunal decision (for example, the immigration department or tax authority);
- Citi's finance department where this is necessary for budgeting, forecasting or funding in respect of particular activities;
- immediate supervisors, line managers, senior leadership and designated people in order for them to carry out their activities;
- authorised persons of accounting, financial and technical departments or information systems teams managing the telephone or information systems for the purposes outlined above, but only to the extent necessary in order to perform their duties and tasks and to any other accountants or professional advisers in order to perform their duties and tasks;

- authorised persons or departments within Citi that handle anti-fraud measures, ethics concerns, compliance, legal and regulatory affairs, risk and audit and security of premises and persons or information, but only to the extent necessary in order to perform their duties and tasks and to any other accountants or professional advisers;
- to third parties to 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 our business, our employees, any Citi company, our clients or others, including to legal advisors, our Regulators, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
- service providers that provide hosting services and technology service providers, business process outsourcing service providers, to the extent necessary to provide these services.

Citi may have reason to send information to third parties with whom Citi has business relationships or is bound by service contracts (IT service providers, etc.). Additionally, Citi may send information to local regulatory authorities when required in order to comply with local law or reporting requirements. We only disclose information that is strictly necessary to enable us to manage or administer our business and employees. For our former employees this means we may provide your Personal Information to third parties to enable us to use their services or when required or permitted by laws and regulations. This includes for example, services relevant to the insurances and health benefits we provide, actuarial benefits or disclosures required for us to use third party software and applications or to obtain advice relevant to former employees and for the processing set out about, to the extent we outsource any of these activities or use third party systems or technology to administer them. Where we provide your Personal Information to third parties, this is on the basis that they agree to comply with the provisions of the General Data Protection Regulation, UK Data Protection Act and/or any other applicable laws.

Transfer of information outside of Europe and the United Kingdom

Citi is a truly global financial services company operating with 200 million customer accounts in more than 100 countries. Given our global reach some information about our employees may be processed by or on behalf of group entities anywhere in the world – for example, payroll or IT services may be performed by one or more group entities acting on behalf of other entities in different locations. Therefore, the work that you performed and our business processes may involve transferring your Personal Information to countries outside of Europe/UK which have different data protection standards to those which apply in Europe/UK.

In making such transfers, Citi conforms to its [Privacy Policy for Transferred European Workforce Data](#) (also known as Citi Workforce “Binding Corporate Rules” (BCR)). Please refer to the provisions of Citi’s BCR for information on how Citi may transfer personal data in compliance with EU law.

Citi may also transfer Personal Information to Citi franchises in jurisdictions which have been deemed equivalent to Europe for data protection purposes in accordance with decisions of the European Commission, or on the basis of further appropriate safeguards, including but not limited to

entry by Citi companies into “Model Contracts” for the purposes of Europe and the UK data protection laws.

In addition, data can be accessed only by group entities that are legally bound to the group’s “processor” BCR and have implemented the commitments made under those BCR, pursuant to the CITI group “processor” BCR and their appendices.

While information about our employees may be processed by or on behalf of group entities anywhere in the world, please note that we have support teams or have data centres that host information located in: the United States, United Kingdom, Poland, Hungary, United Arab Emirates, Costa Rica, China, Singapore, Philippines, Russia, India, Hong Kong and Mexico, which may change time from time. Some of these countries are subject to a European Commission adequacy decision. For other countries, we have put in place European Commission-approved standard contractual clauses (or similar) within Citi or with the relevant third party to protect this Personal Information. We also rely on other permitted data transfer mechanisms such as relying on third party corporate rules (approved by relevant data protection authorities and put in place to protect your Personal Information). You have a right to ask us for a copy of the safeguard used by contacting [HR Shared Services](#).

Sensitive Personal Information

Sensitive Personal Information includes information that reveals: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. It also includes genetic data or 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. Please note that Citi does not ask employees for information concerning political opinions, a person’s sex life, religious or philosophical beliefs or genetic/biometric data (that could be used to identify you) in European countries, unless required by law to do so.

Subject to any applicable local legal requirements/restrictions, we may process your sensitive Personal Information if it is necessary:

- by asking you to provide your consent to the particular type of processing that we wish to complete;
- in circumstances where we need to process your Personal Information to exercise rights or obligations in relation to your employment or social security and social protection laws in so far as this is authorised by law or collective agreement;
- where we consider the use of your Personal Information to be in your vital interests or the vital interests of another person and you are unable to provide consent;
- for the establishment, exercise or defence of legal rights or claims;
- in respect of health information, to the extent that this is relevant for Citi or our vendors, to provide or administer health services, for you and where relevant, your dependents. For

example, private medical, health or life insurance and/or payments during absences due to illness;

- for reasons of substantial public interest, on the basis of laws in the country where you normally work, such as the investigation of ethical or regulatory matters that may concern discriminatory or other conduct that involves the processing of sensitive Personal Information about you or to protect employees who have raised ethical or other concerns;
- in respect of diversity information (race, ethnicity or sexual orientation), where we ask you to provide this information it is on a voluntary basis and provided that you give your consent. Such data is normally only processed for the purpose of monitoring, statistical analysis or in order for Citi to further our equal opportunities and diversity policies or as required by law in countries where it is mandated by law that Citi must collect and report on such information. However, as outlined above, we may also process this information to investigate complaints about discrimination or other conduct.
- In addition, from time to time Citi may also offer you the opportunity to voluntarily participate in initiatives which involve the processing of sensitive Personal Information. Where Citi does so, this will be done on the basis of your consent to participate in such initiatives.

Security

We implement technical and organisational measures that are appropriate to relevant risks to protect the Personal Information that we process about you. This may include:

1. implementing protocols and procedures to protect Personal Information according to the sensitivity of the information;
2. establishing procedures to receive and respond to complaints and inquiries (as detailed in this Privacy Statement);
3. educating staff about Citi's policies and practices and undertaking training to aid in compliance with such policies;
4. developing and disseminating clear communications that explain Citi's policies and procedures;
5. entering into written agreements with third parties which include appropriate security measures to protect Personal Information in line with this Privacy Statement and our obligations.

Specifically, Personal Information may be protected by technical and organizational security measures appropriate to the sensitivity of the information and how it is stored. Such measures may include encryption, password protection, contractual confidentiality and data protection obligations, locked storage facilities, and/or restricted and recorded access, as applicable.

Data Storage and Retention Periods

In general your Personal Information will be held and managed in accordance with the record retention periods specified in accordance with Citi's Records Management Policy.

Personal Information is kept for the period of time that it is needed by Citi in connection with employment. This includes for the duration of, and following, your employment with us, until the relevant retention period expires. Appendix 2 sets out Citi's general storage periods for personnel records. Citi applies the following considerations to its retention periods:

- Personal Information collected that is necessary for exercising a right in court is kept for the applicable statute-of-limitations period. At the end of that statute-of-limitations period, it will be deleted, unless it is connected to any current or prospective litigation or subject to a hold notice.
- Personal Information collected that is necessary to meet a statutory or regulatory obligation is kept for the time necessary to fulfil the obligation in question. It is deleted when there is no further reason to justify its storage.

Your Rights in Respect of Your Personal Information

Under certain circumstances, you have the right to:

- Request access to your Personal Information (commonly known as making a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your Personal Information in certain circumstances. Importantly, the information held on personnel files is required by us to carry out a range of activities as your former employer (set out above) and in such circumstances we would be unable to delete your Personal Information. You also have the right to ask us to delete or remove your Personal Information where you have exercised your right to object to processing and your request is upheld (see below).
- Object to the processing of your Personal Information, to the extent that we are relying on a legitimate interest (or those of a third party) to process your Personal Information, and there is something about your particular situation which makes you want to object to processing on this ground, subject always to our compelling legitimate grounds to continue to process your Personal Information.
- Request the restriction of the processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information. We will only agree to stop



processing your Personal Information in limited circumstances such as where ongoing processing is unlawful, or if you have objected to your Personal Information being processed and pending verification of Citi's assertion that its legitimate grounds in processing your Personal Information override your own.

Limitations can apply to your ability to exercise some of these rights. For example, under the General Data Protection Regulation, UK Data Protection Act or other applicable laws, if you request erasure of your Personal Information, Citi can keep the Personal Information if processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (in addition to other grounds).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the Personal Information concerning you that we hold (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it and otherwise to assist us to process your request in a timely manner.

If you want to review, verify, correct or request erasure of your Personal Information, or object to the processing of your Personal Information, please contact [HR Shared Services team](#) . Please note that Citi will not transfer employee data to a third party at the request of an employee, save as required by the General Data Protection Regulation or any other applicable laws.

No fee usually required

Normally you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee based on administrative costs, if we consider your request for access to be unfounded, excessive or repetitive. Alternatively, we may refuse to comply with the request in such circumstances. In that event, we will explain to you why we have made that decision.

Who Can I Contact About How Citi Processes My Personal Information?

If you wish to review, verify, correct, erase or object to the processing of your Personal Information, please contact the [HR Shared Services team](#) .We would always encourage you to raise issues to Citi in the first instance. In the event that you have any concerns or complaints related to our processing of your Personal Information, please contact the [HR Shared Services team](#).

You can also contact Citi's Group Data Protection Officer who oversees Citi's compliance with privacy requirements including the General Data Protection Regulation. You can write to them by addressing your letter to:

EU/EEA	UK
EU/EEA Data Protection Officer Citi 1 North Wall Quay Dublin D01 T8Y1 Ireland Email: dataprotectionofficer@citi.com	UK Data Protection Officer Citi Citigroup Centre 25 Canada Square London E14 5LB United Kingdom Email: dataprotectionofficer@citi.com

We appreciate that you may not feel that it is possible to raise your concerns with us directly. As such, you may make a complaint at any time to the relevant Supervisory Authority in the location where you normally work.

United Kingdom	The Information Commissioner's Office (ICO)	Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Website- https://ico.org.uk/global/contact-us/ Phone: +44 1625 545 700
Europe	The Data Protection Commission Ireland (DPC)	Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland Website- https://dataprotection.ie/en/contact/how-contact-us Phone: +353 (0)761 104 800

APPENDIX 1: CITI DATA CONTROLLERS AND REGULATORS

Further information about Citi's Data Controllers is available on this [webpage](#), which includes links to information about the Citi entities below:

Country	Data Controllers
Austria	Citibank Europe plc Austria
Belgium	Citibank Europe plc Belgium
Bulgaria	Citibank Europe plc Bulgaria
Czech Republic	Citibank Europe plc Czech Republic
Denmark	Citibank Europe plc Denmark
Finland	Citibank Europe plc Finland
France	Citibank Europe plc France Citigroup Global Markets Europe AG France
Germany	Citigroup Global Markets Europe AG Citibank N.A. Germany Citigroup Global Markets Finance Corporation & Co. beschränkt haftende Citibank Europe plc, Germany branch
Greece	Citibank Europe plc Greece
Hungary	Citibank Europe plc Hungary
Ireland	Citibank Europe plc Ireland Citibank N.A. Ireland Citi Depository Services Ireland Designated Activity Company Citigroup Global Markets Limited
Italy	Citibank N.A. Italy Citigroup Global Markets Limited Citibank Europe plc Italy Citigroup Global Markets Europe AG, Italy
Jersey	Citigroup Channel Islands Limited
Luxembourg	Citibank Europe plc Luxembourg Citigroup Global Markets Luxembourg S.a r.l
Monaco	Citi Global Wealth Management S.A.M
Netherlands	Citibank Europe plc Netherlands
Norway	Citibank Europe plc Norway
Poland	Citibank Europe plc Poland
Portugal	Citibank Europe plc Portugal
Romania	Citibank Europe plc Romania
Slovakia	Citibank Europe plc Slovak Republic
Spain	Citibank Europe plc Sucursal en Espana Citigroup Global Markets Europe AG Sucursal en Espana Citispain S.A. Citifin, S.A.
Sweden	Citibank Europe plc Sweden
Switzerland	Citibank, N.A., Switzerland, Sioux Falls, Zurich Branch Citibank, N.A., Switzerland, Sioux Falls, succursale de Genève Cititrust (Switzerland) Limited Citigroup Global Markets Limited, London, Zweigniederlassung Zürich Citigroup Global Markets Switzerland Holding GmbH
United Kingdom	Canada Square Operations Limited Citibank Europe plc UK Citibank N.A. UK Branch Citibank UK Limited Citigroup Global Markets Europe AG United Kingdom Citigroup Global Markets Limited Citigroup Global Markets Inc Citigroup Technology Inc. United Kingdom
All	Citibank N.A.

APPENDIX 2: STORAGE PERIODS

The following is a list of Citi's general retention periods for personnel records for each of our European locations, which are subject to any Citi hold notices being in place.

A Citi hold notice requires us to continue to store records for particular purposes until that notice is removed. This may extend beyond the retention periods below. The most common situation where Citi hold notices are issued is where the record is connected to actual or prospective litigation.

Country	Retention Period for Personal Records
Austria	30 years after termination of employment
Belgium	15 years after termination of employment
Bulgaria	51 years after termination of employment
Czech Republic	30 years after termination of employment
Denmark	6 years after termination of employment
Finland	6 years after termination of employment
France	6 years after termination of employment
Germany	3 years after termination of employment
Greece	20 years after termination of employment
Hungary	6 years after termination of employment
Ireland	6 years After termination of employment
Italy	10 years After termination of employment
Jersey	10 years After termination of employment
Luxembourg	6 years After termination of employment
Monaco	5 years after termination of employment
Netherlands	7 years After termination of employment
Norway	6 years After termination of employment
Poland	3 years After termination of employment
Portugal	6 years After termination of employment
Romania	50 years After termination of employment
Slovakia	70 years After termination of employment
Spain	6 years After termination of employment
Sweden	5 years After termination of employment
Switzerland	6 years After termination of employment
United Kingdom	6 years After termination of employment

APPENDIX 3: CATEGORIES OF PERSONAL INFORMATION PROCESSED BY CITI

Please see below a list of the categories (or type) of personal information collected by Citi, subject always to local legal requirements:

- identification and administrative information, such as identity, name, surname, date and place of birth, national identification numbers (tax and social security), Citi identification numbers, nationality, citizenship, gender, marital status (and spouse/dependents details where relevant), home address, mother's maiden name, personal telephone/mobile number and personal e-mail address;
- passport or identity card to confirm right to work, or for employees who have reasons to travel or employees who are foreign nationals, work permits or visas;
- if there is access to a car park, vehicle license plate number and parking space number and driver's license for employees who have a company car;
- certain financial information such as bank or other financial account number (for direct deposit of pay), company credit card activity, event registrations and business expenses and reimbursement information;
- information on work qualifications, such as competencies, education, history of previous work experience or career at Citigroup, job appraisals and performance reviews, job succession and talent management, service anniversaries, gratitude programs, performance, professional and personal development, promotions, skills and information relevant to our learning and development offerings and platforms, and employee network membership and events;
- information on the job held, such as date and terms of employment, employment status or type of contract, employer, business unit, management/reporting structure, probation and probation periods, business sector, work address and telephone number, position, job title, function, level, user login ID and the nature of your obligations/duties;
- the history of the employment relationship, such as history of job evaluations, history of positions held, seniority, past sanctions or other actions that have been taken against you;
- if permitted in the country where you work, and provided that you volunteer to provide it, certain demographic information, including gender, ethnicity, sexual orientation and disability;
- information concerning your performance, conduct, disciplinary issues, grievances or ethics complaints (except anonymous complaints);
- voluntary responses to engagement surveys, voice-of-the-employee, voice-of-the-client, demographic information or other reporting avenues (where not submitted anonymously);
- absences (specifically vacations, authorised absences, family friendly leave, days of reduced work hours, work exemptions and other absences, including: reasons, rights to be absent and the duration of absences);
- work hours, rotas and work schedules, building access badges, badge number and validity date, times of entry and building access points; photographs for ID or building access cards where applicable and photos of employees for the directory posted on the Intranet and used in other applications (e.g. Citi For You and email);

- business calendars, which can particularly indicate the dates, places and times of work, meetings, the topics or the persons present;
- general information that we learn about you during your employment and about your employment relationship with us;
- information concerning your behavioural characteristics should you participate in personality or behavioural tests as part of team building, learning, development, coaching or leadership programmes, such information is only used for the purposes of such initiatives;
- information about work email/voicemail (such as address books, email addresses, individual account information) and the company Intranet (internal administrative forms, organisational flowcharts, chartrooms, information forums), including information within any emails or other communications that you or our clients send to us or that you send to other employees, which use Citi IT systems;
- connection data and information about usage of various information systems or hardware made available by Citi or to which Citi provides access and information on entitlements to software, applications or hardware;
- when using telephone services provided by Citi, the telephone numbers called, the service used, the operator called, the nature of the call (in the form: local, regional, national, international), its duration, the date and time the call started and ended, any billing information (number of units, volume and nature of the information exchanged but excluding its content, and the cost of the service used, except where we are required to monitor the content of telephone calls, for example, to meet our regulatory requirements under the Market Abuse Regime, or for security or disciplinary purposes);
- information about doctor's appointments (date of appointments, medical record of fitness or examination issued by the company doctor), but not other details of those appointments, unless we specifically ask you to share this information and you consent to sharing it with us;
- information about your health, including any medical condition, health and sickness records, but only to the extent necessary to assess fitness for work or to process sickness related benefits/entitlements or dietary requirements for events organised by Citi;
- for particular individuals certain personal and financial information including but not limited to personal trading accounts or personal transactions (where you are covered by Citi's policies that restrict personal trading) and outside business activities, outside directorships, advisory board memberships, investor's councils and industry trade association memberships;
- information about compensation and compensation history, information about participation in employee savings plans (which can include health protection, income maintenance and supplemental pension plans), participation of all or some beneficiaries in social security benefits, participation in share-based compensation programs;
- contact information of persons to be called in case of emergency and continuity of business situations, such as next of kin;
- work accident and commuting accident claims as well as occupational illness claims made by employees;

- information about illness/sick leave (primarily date stopped work, date returned to work and fitness for work to the extent legally permissible);
- data recorded by video/telephone surveillance devices for security or disciplinary purposes;
- recordings of trading room conversations pursuant to local regulatory requirements and/or any applicable internal Citi policy;
- information concerning you or other employees that is relevant to the safety and security of Citi, our employees or third parties;
- for those countries that have unions, staff delegations, works councils or other employee representative bodies, the following information, but only to the extent permitted by local laws or regulations: information on employee representative institutions and particularly information on election results (list of persons elected, trade-union positions held, number and percentage of votes obtained, identity of employees elected and trade-union membership), record of hours of work connected with such activities, information on meetings (meeting notices, preparatory documents, minutes of meetings), information on electoral rolls (identity, age, seniority, board, nature of position sought, trade-union membership) or to collect any fees where this must be managed by Citi;
- information concerning any future employment collected as part of exit interview processes and reasons for leaving Citi; and
- regarding food services, information for managing any amounts paid for by Citi or to determine such amounts.

While the above list is detailed, it may not be an exhaustive list of all of the Personal Information that Citi collects, uses or otherwise processes in the context of the employment relationship which may change from time to time.