



## Enterprise Supply Chain (ESC) / Third Party Management (TPM) Group EU GDPR SUPPLIER PRIVACY STATEMENT

### 1. SCOPE

1.1 This Privacy Statement ("**Statement**") explains to Citi's suppliers' directors, personnel, suppliers, sub-contractors or other contacts or persons ("**you**") how certain Citi data controllers referenced below ("**we**", "**Citi**", "**us**") process personal data about you. This Statement applies to the processing of personal data by the data controllers identified in Section 1.3 below where the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") applies. This Statement includes a description of your data protection rights, including a right to object to some of the processing which we carry out.

1.2 We obtain and record your personal data from our suppliers, from you or from our dealings with you or in certain instances from third parties, in each case as further specified below in this Statement. References to 'our suppliers' refers to, depending on who you are, your employer or the company you are associated with as a director, officer, or other contact or association that has an agreement with us or where such agreement is contemplated. Our suppliers are based within the European Economic Area and outside the European Economic Area.

1.3 The relevant data controllers of such personal data are the Citi entities that receive or benefit from services being provided by our suppliers pursuant to a contractual relationship (or a contemplated contractual relationship) between Citi and our suppliers. The contact details for the data controllers on this Statement are Citibank Europe PLC, 1 North Wall Quay, Dublin, 1 Ireland. Information in relation to other Citi Companies who receive or benefit from services being provided by our suppliers can be found using the following web link and clicking on the relevant region and country in order to locate entity and contact information: <https://www.citigroup.com/citi/about/countries-and-jurisdictions/>.

1.4 When we refer to a "**Citi Company**" or "**Citi Companies**" we mean another part of our group now or in the future including officers, directors, employees, agents, representatives, professional advisers. This includes the entities that can be found in the link provided in Section 1.3.

1.5 For more details you can contact our Data Protection Officer at [dataprotectionofficer@citi.com](mailto:dataprotectionofficer@citi.com) or Citigroup Centre, 33 Canada Square, Canary Wharf, London E14 5LB, United Kingdom.

### 2. PERSONAL DATA WE PROCESS

2.1 We process the following personal data about you:

- (i) information that you provide us directly (this may include name, company, title and job description and contact details such as email address and telephone number and business address and bank details such as account number and bank name);
- (ii) information about you provided by our suppliers (this may include your name, company, title and job description, contact details such as email address and telephone number and business address and bank details such as account number and bank name);
- (iii) information within any emails, other communications you or our suppliers send to us or your or our suppliers use of our systems;
- (iv) information we learn or obtain about you from our dealings with you;
- (v) information we obtain from any government issued documents you provide to us (including passport and identification cards);
- (vi) information we learn about you from public sources (such as global news databases or open source searches);
- (vii) information we learn about you from economic or trade sanctions lists and

(viii) any other information about your relationship with us (including length of relationship).

### 3. LEGAL BASIS AND USES OF PERSONAL DATA

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

<p><i>(a) Where we are required by EU laws to do this</i></p>	<ul style="list-style-type: none"> <li>(i) To disclose information to government or regulatory bodies, courts or other parties.</li> <li>(ii) To conduct compliance activities such as assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. If you are unwilling to provide your personal data in these circumstances, then we may be unable to receive (or continue receiving) the relevant service from you, your employer, the company or other contact you are associated with.</li> </ul>
<p><i>(b) Where necessary for our or a third party's legitimate interests (listed here) and where your interests do not override these interests</i></p>	<ul style="list-style-type: none"> <li>(i) To enable us to receive services from our suppliers and to enable any service to our clients to be provided.</li> <li>(ii) To manage and administer Citi's business, and to manage and relationships with you and our suppliers.</li> <li>(iii) To facilitate supplier risk management activities in order to comply with applicable legal, regulatory and compliance requirements (including conducting sanctions screening and reputational checks).</li> <li>(iv) To communicate with credit reference and information agencies.</li> <li>(v) To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity.</li> <li>(vi) To manage our information technology and to ensure the security of our systems;</li> <li>(vii) To disclose information to a governmental or regulatory body, court or other third party, when we think this is in our, or someone else's interests, but where EU law does not require us to make this disclosure.</li> <li>(viii) To establish, exercise or defend legal claims and in order to protect and enforce Citi's rights, property, or safety, or to assist our clients, suppliers or others to do this.</li> </ul>

### 4. WHEN WE DISCLOSE PERSONAL DATA

4.1 We, any Citi Company (or any third party on our behalf) may transfer personal data to others as follows:

- (i) to any other Citi Company for the purpose of managing our and their relationship with you, our suppliers and other purposes identified in this Statement. In addition, you should be aware that



your (or your employer's) interactions with other Citi businesses and functions other than ESC and TPM may mean that those functions are provided with and processing personal data in connection with receipt of services, relationship management or other reasons;

- (ii) to our suppliers in connection to the services provided to us, and other purposes set out in this Statement;
- (iii) as required in order to establish, exercise or defend or to protect legal claims, including in relation to our contracts with our suppliers and in order to protect the rights, property, or safety of us, our business, any Citi Company, our suppliers or others including to legal advisors, government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings;
- (iv) to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction or, domestic or foreign, upon their request or in accordance with or as desirable in respect of any applicable law;
- (v) to communicate with credit reference and information agencies;
- (vi) to any other third parties to the extent such disclosure is required under applicable law or to enable us to receive services from our suppliers;
- (vii) in case of threatened or filed litigation, Citi and any Citi Company may process and exchange personal data with management and counsel;
- (viii) in case of substantial business risks and for compliance with laws, risk criteria, procedures, and policies, we and any Citi Company may process and exchange personal data with the responsible 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;
- (ix) 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 Company, 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;
- (x) 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; and
- (xi) to prospective sellers or buyers as part of a sale or merger of our or any Citi Company's business or assets.

## 5. WHERE WE TRANSFER PERSONAL DATA

5.1 We transfer your personal data to Citi Companies or third parties (e.g. other suppliers) overseas, which involves the transfer of personal data to countries outside the European Economic Area that have different data protection standards from those which apply in the European Economic Area. For a list of the countries in which we operate, please see <https://www.citigroup.com/citi/about/countries-and-jurisdictions/>.

5.2 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 within our group or with the relevant third party to protect this personal data. We also rely on other permitted data transfer mechanisms such as relying on the relevant third party's Privacy Shield certification or third party's corporate rules, which are approved by EU data protection authorities and put in place to



protect your personal data. You have a right to ask us for a copy of the safeguard used by contacting us as set out in Section 1.

## **6. HOW LONG WE KEEP YOUR PERSONAL DATA**

We keep your personal data for as long as is necessary for the purposes of our relationship with you or our supplier or in connection with performing an agreement with our supplier or complying with a legal or regulatory obligation, and Citi records retention policy requirements.

Where we process personal data in connection with performing an agreement we have with you or our client, we keep your personal data for as long as is required in order to fulfil our contractual obligations to you or our suppliers.

Where we process personal data in connection with a legal obligation such personal data will be kept for as long as is required under applicable law.

## **7. YOUR RIGHTS**

7.1 You may ask us for a copy of your personal data and you may ask us to correct it. In certain circumstances, you have the right to require us to erase your personal data or to transfer it to other organisations. You also have rights to object to some processing of your personal data and, where we have asked for your consent to process your personal data, to withdraw this consent. Where we process your personal data because we have a legitimate interest in doing so (as explained above), you also have a right to object to this. You also have the right to restrict processing of your personal data in certain circumstances. These rights may be limited in some situations; for example, where it would infringe the rights of a third party (including our rights), (if you ask us to delete information) where we are required to process your personal data by EU or EU Member State law or where the information is required for the establishment, exercise or defence of legal claims, (if you object to our processing) where we can demonstrate that we have legitimate grounds to continue processing your personal data or where we are not in a position to identify the personal data that relates to you. Relevant exemptions and restrictions on your rights are included in both the GDPR and in relevant local data protection laws. Where required, we may inform you of relevant exemptions we rely upon when responding to any request you make. We may ask you to verify your identity and to provide other details to help us to respond to your request.

7.2 If you wish to exercise these rights, please contact us using the contact details in Section 1, or send your data subject access requests to [SupplierDataSubjectRequests@citi.com](mailto:SupplierDataSubjectRequests@citi.com). We hope that we can satisfy any queries that you may have about the way we process your personal data. However, if you have unresolved concerns you also have the right to complain to the relevant data protection authorities. You can bring the complaint in the EU Member State where you reside, where you work or where the alleged infringement of data protection law occurred.

## **8. CHANGES TO THE PRIVACY STATEMENT**

This Statement takes effect on 25 May 2018. If we change this Statement at any time we will place any new versions on this <https://www.citigroup.com/citi/suppliers/>. We encourage you to regularly review this Statement to ensure that you are always aware of what personal data we collect, how we use and otherwise process it and under what circumstances we will share it with third parties.