

Citi Ethics Office Privacy Notice

Last Updated February 2026

1. Scope

- 1.1** This Citi Ethics Office Privacy Notice (“Notice”) explains to Citi Workforce Members (Employed Workforce), Directors, Non-Employees (Contingent Workforce), suppliers, clients, and members of the public how Citi’s Ethics Office (“we”, “us”, or “our”) may use and otherwise process personal data (sometimes also referred to as personal information).
- 1.2** This Notice sets forth the principles governing the processing of your personal data and outlines your privacy rights, to the extent available under laws applicable in your country of residence. This document is not intended, nor should it be interpreted, as a binding contract enforceable against you or Citi.
- 1.3** Please be aware that certain countries (particularly EU/EEA countries) have, in addition to the Ethics Office, a country-specific facility to assist individuals in raising conduct compliance concerns in their own country, as required by national laws issued under the EU Whistleblowing Directive.
- 1.4** Please be aware you may also be subject to separate Citi Privacy Notices depending upon your relationship, if any, with Citi. The Ethics Office is located in the United States and is a part of Citibank, N.A., (“Citi”) a US National Banking Association with registered address at 701 East 60th Street North, Sioux Falls, South Dakota, 57104. The Ethics Office oversees the handling of employee complaints and concerns, and is a data controller (or an ‘independent business’ under the California Privacy Rights Act). All contacts to the Ethics Office and related investigations are treated as confidentially as possible, consistent with the need to investigate and address the matter, and subject to applicable laws and regulations.

2. Personal Data We Collect

- 2.1** The Ethics Office collects the following types of personal data:
 - Name
 - Role / Title
 - Employment or relationship status (e.g., Citi employee, contractor, supplier, client, etc.)
 - Contact Details (including address, phone and Email)
 - Information you, or another individual who submits a complaint / notice, choose to include in your complaint / notice to our office

Some of the information we receive may be considered “sensitive personal data” or “special category data” under certain data protection or privacy laws. For example, we

may may receive criminal background, data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life, sexual orientation or trade union membership, solely to the extent this sensitive personal information is directly and necessarily related to a concern you raised (or was raised in relation to you) and in accordance with applicable law.

3. How We Collect Personal Data

3.1 We may collect personal data in a variety of ways, including:

- **Directly from you**, such as when you submit a complaint or raise a concern with us or through other interactions with the Ethics Office in connection with an investigation.
- **From other individuals**, such as if someone else raises a concern about you or that involves you.
- **From other Citi entities or functions**, as well as third parties, such as Citi's regulators or suppliers, when that data is related to potential violations of law, regulation, Citi policy, or the Code of Conduct or other concerns raised to the Ethics Office.

4. How We Use Personal Data

4.1 Generally, we use personal data for the following lawful purposes:

- to investigate and respond to any complaints or concerns raised;
- to communicate with individuals when they contact us or when we contact them;
- to protect and enforce the rights, property or safety of our business, Citigroup Inc., and its subsidiaries or affiliates, our officers, directors, partners or third parties (for example, counterparty banks);
- for information security (including to detect, investigate, monitor, remediate and/or prevent security or cyber incidents), to detect and/or prevent fraud, money laundering or terrorism financing, and other forms of crime; and
- As we reasonably believe to be proportionate and necessary to comply with laws, respond to regulatory, administrative, or judicial requests, and protect our operations.

5. When We Disclose Personal Data

5.1 We (or any third party on our behalf) may disclose or transfer personal data within the US or other countries as follows:

- to Citi entities (including to their officers, directors, employees, agents, representatives, and professional advisers) for the other purposes identified in this Notice related to raising, investigating, and remediating concerns raised to the Ethics Office;
- to service providers who may assist Citi in investigating and responding to concerns and to process information we gather;
- to legal advisors, auditors, and with other parties involved in, or contemplating, legal proceedings or others as required in order to establish, exercise or defend or to protect legal claims, and in order to protect the rights, property or safety of Citigroup Inc., and its subsidiaries or affiliates, our clients or other financial institutions; and

- to 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.

6. Lawful Bases for Processing Personal Data

6.1 The lawful basis that we rely on for processing of personal data will vary depending on applicable law. These include:

- **Consent:** We use consent as a lawful basis, subject to conditions applicable in the country where it is collected, where:
 - Consent is the primary or the sole basis for processing; or
 - We are required by law to obtain consent (for example when collecting sensitive personal data); and/or
 - Where consent can be assumed or inferred from your conduct.

In countries where we process your personal data under consent as lawful basis, we will infer it from your conduct – mainly, engaging with us, unless we are under an obligation to collect consent in writing. Note, where it is impossible or impracticable to obtain consent, we may rely on an exception or on another legal basis for processing personal data, where available.

You have the right to withdraw your consent for processing of your personal data. If you wish to do so, please contact us using the [Report a Concern](#) button. PLEASE NOTE: Withdrawal of your consent will not invalidate any processing of information collected up the time of its withdrawal or revocation. We may continue to use any information you provided where it is necessary to comply with a legal or regulatory obligation. If this is the case, we will clearly explain the reason we are unable to stop using your personal data.

- **Compliance with a legal obligation:** We will use this lawful basis if we need to process your personal data to comply with a legal or regulatory obligation. This may include, without limitation, investigating and responding to concerns raised to our office.
- **Public Interests:** Where a specific Public Interest is recognized under applicable law.
- **Legitimate interests:** Where available under applicable law, we will use this lawful basis for processing your personal data if:
 - We have a legitimate purpose for processing your personal data; and
 - Processing your personal data is necessary to achieve this purpose; and
 - Our legitimate interest is not overridden by your individual interests, rights and freedoms.

7. International Data Transfers

The Ethics Office, our third-party partner which operates the telephone hotline and the web submission page on our behalf (NAVEX Global), and our translation service provider, Eriksen Translations, are located in the United States. Because Citi is a global financial institution, your personal data also may be processed in centralized locations (“data hubs”).

In many countries, such activities (known as international data transfers) are subject to certain conditions and restrictions. Citi and its service providers on our behalf will only transfer your personal data across international borders in accordance applicable requirements, including, taking steps to ensure that your personal data receives a functionally equivalent level of protection wherever we, or our service providers process it, including by introducing appropriate contractual, technical and operational measures, and conducting transfer risk assessments.

8. How Long We Keep Personal Data

- 8.1** The Ethics Office stores personal data pursuant to Citi’s Records Management Policy. We keep personal data for as long as is necessary for the uses outlined in Section 3 of this Notice or as required pursuant to applicable legal and/or regulatory obligations. If a concern or complaint results in an investigation, we shall keep your data until that investigation is closed, and store it for a length of time for which we have an obligation to retain evidence, or the period of statutory limitations (the length of time that permits initiating legal proceedings).

9. Security

- 9.1** We have implemented and maintain reasonable administrative, technical, physical and organizational measures as appropriate to protect the security, confidentiality, and integrity of all personal data that we process. Due to the inherent nature of electronic communications, we can never fully guarantee the security of personal data, including where it is processed outside of our network.

10. Individual’s Privacy Rights

- 10.1** Depending upon where you reside, you may have individual privacy rights under the applicable law in your country or territory. For example, many jurisdictions grant four basic rights: Access, Rectification, Cancellation and Objection (by their initials, so-called **ARCO** rights). Where required under applicable law, Citi provides some of these, and other rights as may be described in jurisdiction-specific Supplements.

Where applicable, you may contact us using the [Report a Concern](#) button to exercise any of the following rights:

- Right to **Access** your data: You can contact us to request a copy of the personal data we hold about you. This is often known as a “data subject access request”.
- Right to **Rectify** your data: You can ask us to rectify or correct personal data that we hold about you, which may be inaccurate or incomplete.
- Right to **Cancel** or erase your data: You can ask us to erase or delete personal data that we hold about you, which we will carry out unless we are required to retain it for a specific duration, in order to investigate and respond to concerns raised to our office. This is often known as (the “right to be forgotten”).
- Right to **Object** to processing: You can object or ask us to stop processing your personal data. However, in certain cases, we may not be able to accept your objection or request, if we need to continue to process your personal data for our business, legal, regulatory and other purposes.
- Right to be informed: You have the right to be informed about our processing of your personal data; about the use of any sub-processors (sub-contractors) that may process your personal data and to receive a summary of the processing purposes; and of how we use operational and technical measures to protect your personal data.
- Right to transfer your information to another organization: Where applicable, you can ask us to transfer your personal data to other organizations. This is often known as (the “right to data portability”). There may be some instances where we are not required under applicable law, or where we are not able to transfer your personal data.
- Right to restrict processing of your personal data: You can ask us to restrict processing of your personal data. There may be some instances where we are not able to restrict processing of your data if you do not provide us with a particular reason for wanting the restriction.
- Right to object to the grounds of legitimate interests for processing: Where we rely on legitimate interests as the lawful basis for processing your personal data, you can contact us to object to us processing your data on these grounds, if so, provided by applicable law. We will always consider your reasons for objecting to us processing your personal data on these grounds, and balance your interests, rights, and freedoms with our own legitimate business interests.

Citi may not always be able to provide all requested information or fulfil other rights, where certain exceptions apply to a privacy rights request. If we need to withhold certain information or fulfil your request we will explain the rationale for our decision, and the subsequent steps. We will respond to your request within the timeframes provided under applicable law.

To help ensure your safety and for confidentiality reasons, we must verify your identity before disclosing any personal data. If you are making a request on behalf of someone else (e.g., you are an attorney, relative, or representative) we may require further information to ensure that you are duly authorized to make that request.

11. Changes To This Privacy Notice

- 11.1** If we modify this Notice at any time we will place the modified versions [here](#) and [here](#). We encourage you to regularly review this Notice to ensure that you are always aware of what personal information we collect and how we use, store and disclose it.

12. Contact Us

- 12.1** The Ethics Office can be reached electronically via the Ethics Office’s web submission site (use the [Report a Concern](#) button) or by phone call to the phone number(s) listed on the site. Please note that calls may result in charges from your carrier. Please check with your carrier before dialing.
- 12.2** The contact details for other Citi entities which may have access to your personal data can be accessed here: <http://www.citigroup.com/citi/about/countrypresence/>.
- 12.3** Our Data Protection Officers may be contacted as follows:

EU/EEA Data Protection Officer	Citi 1 North Wall Quay Dublin D01 T8Y1 Ireland Email: dataprotectionofficer@citi.com
Australia Data Protection Officer	Citi Privacy Officer GPO Box 204 Sydney NSW 2001 Ph: 13 24 84 Email: privacy.officer@citi.com
Canada Data Protection Officer	canada.privacy.office@citi.com
Indonesia Data Protection Officer	Indonesia.Privacy@citi.com
Jamaica Data Protection Officer	Citibank Colombia Centro de Servicio Calle 100, Carrera 9A No. 99-02 Piso 1 Local 104 Bogotá, Colombia DPO Email: DPOJamaica@citi.com
Kenya, Uganda, Tanzania, Zimbabwe, Zambia Data Protection Officer	Postal address: P.O. Box 30711 - 00100 Nairobi Physical address: Citibank House, Upper Hill, Nairobi, Kenya Telephone number: +254-20-2754091 Email: Yvonne.n.muturi@citi.com
Nigeria Data Protection Officer	Nigeria Data Protection Officer Address: Citibank Nigeria Limited 27, Kofod Abayomi Street, Lagos, Nigeria

Philippines Data Protection Officer	16F, Citi Plaza, 34th Street, Bonifacio Global City Email: CitiPHDPO@citi.com
Saudi Arabia Data Protection Officer	20th floor of Kingdom Tower, P.O. Box 301700, Riyadh 11372, Central Province, Kingdom of Saudi Arabia Email: dataprivacycsa@citi.com
South Africa Data Protection Officer	145 West Street, Sandown, 2196. Tel: +27 119440743 Email: informationofficerza@citi.com
Switzerland Data Protection Officer	Hardstrasse 201, 8005 Zurich, Switzerland Email: swissdataprotectionadvisor@citi.com
UK Data Protection Officer	Citi Citigroup Centre 25 Canada Square London E14 5LB United Kingdom Email: dataprotectionofficer@citi.com

Supplemental Provision – California

This California Supplemental Provision (the “**Supplement**”) supplements the information contained in the **Citi Ethics Office Privacy Notice** (the “**Privacy Notice**”) and applies solely to residents of California who have rights under the California Consumer Privacy Act (“**CCPA**”) as amended by the California Privacy Rights Act (“**CPRA**”) (“**consumers**” or “**you**”). Unless otherwise defined in the Privacy Notice, any terms defined in this Supplement have the meaning used in the CCPA. As used in this Supplement “Citi,” “we” and “us” means Citibank, N.A. and our subsidiaries and affiliated companies.

Sensitive Personal Information

Under the CCPA, certain types of Personal Information are considered “Sensitive” Personal Information and require additional data privacy rights and obligations. The Citi Ethics Office (“Ethics Office”) only collects this Sensitive Personal Information if it is provided by you voluntarily or by someone raising a concern about you, to detect security incidents, to resist malicious, deceptive, fraudulent or illegal activities (“Permitted Uses”), or as otherwise permitted or required by law. Because we use this Sensitive Personal Information of consumers for Permitted Uses, we do not need to provide a Limit Use and Disclosure of Sensitive Personal Information right under the CPRA.

Summary of Personal Information Handling Practices

We provide in the chart below a summary of our prior 12-month Personal Information handling practices which is consistent with our practices described in Section 2 (**Personal Data We Collect**), Section 4 (**How We Use Personal Data**), and Section 5 (**When We Disclose Personal Data**) of the Privacy Notice. We do not have actual knowledge of any collection, use, sale, or sharing of Personal Information of consumers under 16 years of age.

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	Directly from You, from the organization with which You are associated or represent, from other third parties, from our service providers, and automatically	<u>Sold</u> We have not sold your identifiers to third parties. <u>Shared</u> We have not shared your identifiers with third parties for targeted advertising purposes. <u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
	by using our website.	<p>Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To communicate with You • To establish, exercise, or defend legal claims • To respond to security-related issues • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws • For other purposes listed in the How We Use Personal Data section in the Privacy Notice
Any Personal Information described in Cal. Civ. Code § 1798.80(e), such as name, address, telephone number, account number or financial information	Directly from You, from the organization with which You are associated or represent, from other third parties, from our service providers.	<p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p>

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
		<ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To communicate with You • To establish, exercise, or defend legal claims • To respond to security-related issues • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. • For other purposes listed in the How We Use Personal Data section in the Privacy Notice
<p>Characteristics of protected classifications under California or federal law, such as age, gender, racial or ethnic origin, sexual orientation, or marital status</p>	<p>Directly from You, or from other third parties.</p>	<p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
		<ul style="list-style-type: none"> • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. • For other purposes listed in the How We Use Personal Data section in the Privacy Notice
Professional or employment-related information	Directly from You, from the organization with which You are associated or represent, or from other third parties.	<p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To communicate with You • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
		<ul style="list-style-type: none"> For other purposes listed in the How We Use Personal Data section in the Privacy Notice
Commercial information, such as records of products or services purchased, obtained, or considered, and other consuming histories or tendencies.	N/A	We do not collect, process, or share such information.
Internet or other electronic network activity information, including but not limited to browsing history, search history, and information regarding a consumer's interaction with an internet website application	N/A	We do not collect, process, or share such information.
Sensitive Personal Information, such as information regarding or that may reveal consumers' racial or ethnic origin, citizenship status or immigration status, religious or philosophical beliefs, union membership, political opinions, health information, sex life, or sexual orientation and consumers' biometric information	We may collect this information directly from You, or from other third parties, however, we do not collect biometric information.	<p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
		<ul style="list-style-type: none"> • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws. • For other purposes listed in the How We Use Personal Data section in the Privacy Notice
<p>Audio, electronic, visual, or similar information, such as photographs, audio, and video recordings</p>	<p>Directly from You, or from other third parties.</p>	<p><u>Sold</u> We have not sold such Personal Information to third parties.</p> <p><u>Shared</u> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><u>Service Providers</u> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of the Ethics Office. See the When We Disclose Personal Data section in the Privacy Notice for more details.</p> <p><u>Purposes of Processing such Personal Information</u></p> <ul style="list-style-type: none"> • To investigate and respond to complaints or concerns raised to the Ethics Office by You or about You • To establish, exercise, or defend legal claims • To fulfill our compliance or legal obligations or as otherwise permitted by applicable Laws.

Category of Personal Information	Sources	Business or commercial purpose of processing and recipients of Personal Information
		<ul style="list-style-type: none"> For other purposes listed in the How We Use Personal Data section in the Privacy Notice
Geolocation data, such as your address	N/A	We do not collect, sell, or share such information.
Inferences drawn from any of the information identified herein, such as behavior, attitudes, preferences or characteristics derived from consumer interactions	N/A	We do not collect, sell, or share such information.

Selling or Sharing of Personal Information

We do not sell your Personal Information or share your Personal Information for cross-context behavioral advertising, and have not done so in the prior 12 months. We also do not knowingly sell or share the Personal Information of children under the age of 16, and have not done so in the prior 12 months.

Retention of Personal Information

We store Personal Information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Your Rights and Choices

The CPRA affords consumers residing in the California certain rights with respect to their Personal Information, subject to certain exceptions. Subject to certain limitations, you have the following rights in California:

- (1) Right to Delete. You have the right to request us to delete the Personal Information we have collected about you.
- (2) Right to Correct. You have the right to request us to correct inaccurate Personal Information we maintain about you.
- (3) Right to Know and Access. You have the right to know and access the Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected,

the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.

- (4) Data Portability. You have the right to receive the information under right (3) in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the Personal Information to a person without impediment, where the processing is carried out by automated means.
- (5) Rights Related to Sharing for Cross-Context Behavioral Advertising or Sale. We do not share your Personal Information for cross-context behavioral advertising or sell your Personal Information and so this right is not applicable.
- (6) Right to No Discrimination. You have the right not to be discriminated against for exercising any of your privacy rights.

Exercising Your Rights

To exercise your rights described above, please submit a verifiable consumer request to us by either:

- Visiting Citi's California Privacy Hub at <https://online.citi.com/dataprivacyhub>; or
- Calling us at (833) 971-1191 (TTY: 711)

We will need to verify your identity before honoring your privacy right request by asking you to provide Personal Information we may have previously collected about you. Subject to certain limitations, we will honor your privacy rights request within 45 calendar days of receipt of your request, unless we request an extension as permitted by data privacy laws.

Authorized Agents

- You may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please contact us by either:
- Visiting Citi's California Privacy Hub at <https://online.citi.com/dataprivacyhub>; or
- Calling us at (833) 971-1191 (TTY: 711)

Contact Us

If you have any questions about this Supplement or the ways in which the Ethics Office collects and processes your Personal Information described in this Supplement, please contact us via the Ethics Office's web submission site (use the [Report a Concern](#) button) or by telephone using the phone number listed on the site. Please note that calls may result in charges from your carrier. Please check with your carrier before dialing.