

CITIBANK NIGERIA LIMITED DATA PROTECTION STATEMENT

Citibank Nigeria Limited's ("CNL") a bank licensed by the Central Bank of Nigeria, Data Protection Statement describes how CNL collects, uses or otherwise processes Personal Information of individuals with whom CNL comes in contact or whose personal information CNL obtains, in the course of business dealings.

This Data Protection Statement is non-contractual and may be amended at anytime.

1. Who is responsible for your Personal Information and how can you contact them?

CNL is a data controller, as defined in the Nigeria Data Protection Regulation ("NDPR"), and Nigeria Data Protection Act (NDPA) and is responsible for your personal information.

For more information, please contact CNL's Data Protection Officer at Citibank Nigeria Limited, 27, Kofo Abayomi Street, Victoria Island, Lagos, Nigeria.

E-mail: dponigeria@citi.com

2. What is Personal Information and Sensitive Information/Sensitive Personal Data

"Personal Information" means any information about you as an individual that CNL collects, uses or otherwise processes from which you can be identified such as a name, an identification number, date of birth, physical address, an email address, bank details, and any other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, etc.

"Sensitive Information/Personal Data means personal data relating to an individual's (a) genetic and biometric data, for the purpose of uniquely identifying a natural person (b) race or ethnic origin (c) religious or similar beliefs, such as those reflecting conscience or philosophy (d) health status (e) sex life (f) political opinions or affiliations (g) trade unions memberships or, (h) other information prescribed by the Commission, as sensitive personal data.

3. CNL's Data Processing Principles

The following principles are the foundation of CNL's commitment to data protection:

- Transparency
- Purpose limitation
- Proportionality
- Accuracy
- Confidentiality
- Accountability
- Compliance with applicable Data Protection laws and regulations

4. Why does CNL Process your Personal Information?

CNL will process your Personal Information, as necessary, to pursue CNL's legitimate business and other interests, which include but are not limited to the following purposes:

- to provide financial products and services to CNL's clients and to communicate with you and/or CNL's clients about them;
- to manage, administer and improve CNL's business, client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;
- to monitor and analyze the use of CNL's products and services for system administration, operation, testing and support purposes;
- to manage CNL's information technology and to ensure the security of CNL's systems;
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce CNL's rights, property or safety, or to assist CNL's clients or others to do this;
- to investigate and respond to complaints or incidents relating to CNL's business, to maintain service quality and to train staff to deal with complaints and disputes;
- to cooperate with, respond to requests from, and to report transactions and/or other activity to government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third parties;
- to monitor and analyze the use of CNL's products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention, measures relating to sanctions and anti-terrorism laws and regulations, and combating crime. This includes Know Your Customer (KYC) due diligence (which involves identity checks and verifying address and contact details), Politically Exposed Persons screening (which involves screening client records against internal and external databases to establish connections to 'Politically Exposed Persons' (PEPs) as part of client due diligence and onboarding), and sanctions screening (which involves the screening of clients, their representatives and counterparties against published sanctions lists); and
- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity. To

the extent permitted by law, these recordings are CNL's sole property.

CNL will process your Personal Information in compliance with applicable laws and regulations. CNL will cooperate with CNL's regulators and other authorities to prevent and detect financial crimes and regulatory breaches as well as protect CNL's businesses and the integrity of the financial markets.

CNL may or may not rely on consent as the legal basis for processing your Personal Information. There are certain reasons for which your Personal Information may be required which include but are not limited to complying with law, regulation and/or for contractual purposes and your consent is not required for such use. If CNL relies on your consent, this will be made clear to you at the time CNL requests for your consent. Your silence will never be assumed to be consent. Where your consent is obtained as the legal basis for processing, you are at liberty to withdraw your consent at any time by sending a request to CNL's Data Protection Officer through the advised channel. However, withdrawal of your consent shall not affect the lawfulness of the use of your Personal Information that has been processed before consent is withdrawn.

CNL will use your Personal Information only for the purposes it was collected. Where CNL intends to further process Personal Information for a purpose other than the original purpose, you will be provided with information about that other purpose, together with any other relevant information, prior to that further processing.

If you do not provide information that CNL requests, CNL may not be able to provide (or continue providing) relevant products or services to, or otherwise do business with you or your organization.

5. Where does CNL obtain Personal Information about you?

CNL processes Personal Information that you provide directly or that CNL learns about you from your use of CNL's systems, from communications and other dealings with you and/or your organization. Your organization may also give CNL some personal data about you, which may include your date of birth, contact details such as your business email address, physical address and telephone number and other information required for KYC, AML and/or sanctions screening purposes (e.g., copies of your passport). CNL may also obtain some Personal Information about you from publicly available websites, databases and other public data sources.

6. To whom does CNL disclose your Personal Information?

CNL may disclose your Personal Information, for the purposes set out in Section 4, as follows:

- to your organization in connection with the products and services that CNL provides to it if your organization is CNL's client, or otherwise in connection with CNL's dealings with your organization;
- to other Citi entities and affiliates (including entities referenced at <http://www.citigroup.com/citi/about/countrypresence/> for the purpose of managing CNL's client, service provider and other business counterparty relationships;
- to counterparty banks, payment infrastructure providers and other persons from whom CNL receives, or to whom CNL makes payments on clients' behalf;
- to export credit agencies, multilateral agencies, development finance institutions, other financial institutions, governmental authorities and their agents, insurers, due diligence service providers and credit assessors, in connection with the products and services that CNL provides to your organization if your organization is CNL's client;
- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services;
- to CNL's professional service providers (e.g., legal advisers, accountants, auditors, insurers and tax advisers);
- to government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings;
- to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction;
- to other persons where disclosure is required by law or to enable products and services to be provided to you or CNL's clients; and
- to prospective buyers as part of a sale, merger or other disposal of any of CNL's business or assets.

7. Where does CNL transfer your Personal Information?

CNL may transfer your Personal Information to Citi entities, regulatory, prosecuting, tax and governmental authorities, courts and other tribunals, service providers and other business counterparties located outside Nigeria, including countries which have different data protection standards to those which apply in Nigeria. CNL may also transfer your Personal Information to Citi entities in jurisdictions which have been deemed equivalent to Nigeria for data protection purposes in accordance with decisions of the Relevant Regulatory Authorities, or on the basis of further appropriate safeguards, including but not limited to standard contractual clauses for the protection of your Personal Information.

8. How long will CNL keep your Personal Information?

CNL will keep your Personal Information for as long as is necessary for purposes of our relationship with you or your organization or in connection with performing an agreement with you or your organization or in compliance with a legal or regulatory obligation.

CNL shall erase Personal Information without undue delay, where —

- (a) the Personal Information is no longer necessary, in relation to the purposes for which it was collected or processed, or
- (b) CNL has no other lawful basis to retain the Personal Information.

9. Your Rights in Respect of Your Personal Information

Under certain circumstances and in line with the provisions of the NDPR and NDPA, you have the right to:

- Request access to your Personal Information (make a “data subject access request”). This enables you to receive a copy of the Personal Information CNL holds about you;
- Request rectification of the Personal Information that CNL holds about you. This enables you to correct any incomplete or inaccurate information CNL holds about you;
- Request the erasure of your Personal Information in certain circumstances. You also have the right to request the deletion or removal of your Personal Information where you have exercised your right to object to processing and your request is upheld;
- Object to the processing of your Personal Information. CNL shall discontinue the processing of your Personal Information on your request, unless CNL demonstrates a public interest or other legitimate grounds, which overrides your fundamental rights and freedoms and interests.
- Request the restriction of the processing of your Personal Information. This enables you to ask CNL to suspend the processing of your Personal Information. CNL will only agree to stop processing your Personal Information in limited circumstances such as where ongoing processing is unlawful;
- Request that your Personal Information be transmitted directly from one Data Controller to another, where technically feasible, provided that such data portability shall not adversely affect the rights and freedoms of other persons; and
- Not be subject to a decision based solely on automated processing, which does not require human involvement or influence on the outcome of the decision.

CNL may need to request specific information from you for confirmation of your identity and to ensure your right to access the Personal Information held by CNL (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 CNL to process your request in a timely manner.

To exercise these rights or if you have questions about how CNL processes your Personal Information, please contact your Relationship Manager or Citiservice or via the link <https://www.citigroup.com/global/privacy/contact-us>

Further Protections

Without prejudice to the principles set out in the NDPA, CNL shall not process your Sensitive Personal Data, unless:

- (a) you have given and not withdrawn consent to the processing for the specific purpose or purposes for which it will be processed;
- (b) processing is necessary for the purposes of performing the obligations of CNL or exercising your rights under employment or any other similar laws;
- (c) processing is necessary to protect your vital interests or of another person, where the data subject is physically or legally incapable of giving consent ;
- (d) processing is carried out in the course of its legitimate activities, with appropriate safeguards, by a foundation, association, or such other non-profit organisation with charitable, educational, literary, artistic, philosophical, religious, or trade union purposes, and the —
 - (i) processing relates solely to the members or former members of the entity, or to persons, who have regular contact with it in connection with its purposes, and
 - (ii) sensitive personal data is not disclosed outside of the entity without the explicit consent of the data subject ;
- (e) processing is necessary for the establishment, exercise, or defense of a legal claim, obtaining legal advice, or conduct of a legal proceeding ;
- (f) processing is necessary for reasons of substantial public interest, on the basis of a law, which shall be proportionate to the aim pursued, and provides for suitable and specific measures to safeguard the fundamental rights, freedoms and interests of the data subject ;
- (g) processing is carried out for purposes of medical care or community welfare, and undertaken by or under the responsibility of a professional or similar service provider owing a duty of confidentiality ;
- (h) processing is necessary for reasons of public health and provides for suitable and specific measures to safeguard the fundamental rights, freedoms and interests of the data subject ; or
- (i) processing is necessary for archiving purposes in the public interest, or historical, statistical, or scientific research, in each case on the basis of a law, which shall be proportionate to the aim pursued, and provides for suitable and specific measures to safeguard the fundamental rights and freedoms and the interests of the data subject.

We will inform you of the existence of automated decision-making, including profiling, the significance and envisaged consequences for you. We will also restrict data processing pending —

(i) the resolution of a request,
(ii) objection by you, or
(iii) the establishment, exercise, or defence of legal claims.
You can also opt out of the processing of your Personal Information for direct marketing purposes.

Security and Data Quality

We may hold your Personal Information in either electronic or hard copy form. In both cases, CNL will take reasonable and appropriate steps to ensure that your Personal Information is protected from misuse, accidental loss and from unauthorised access or disclosure.

In the event that the protection of your Personal Information is compromised or interfered with, you may lodge a complaint with the Nigeria Data Protection Commission at No.12 Clement Isong Street, Asokoro, Abuja, Nigeria or info@ndpc.gov.ng

You can also complain to CNL's Data Protection Officer. CNL will aim to ensure that such complaints are resolved within a reasonable time.

Last Updated: April 24, 2024