



Citi Canada

Privacy of Personal Information Statement

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Citi Canada Privacy of Personal Information Statement

INTRODUCTION

The following Citi companies are Canadian companies and affiliates of each other and Citigroup Inc. These Canadian companies (collectively referred to as “**Citi Canada**” in this Privacy of Personal Information Statement) provide a wide range of financial products and other products and services to their customers throughout Canada.

Citibank Canada: Citibank Canada provides a wide range of financial services to corporate customers and personalized wealth management products and services to customers in Canada. Citibank Canada is the issuer of Citi Mastercard® and Citi Visa® cards in Canada.

Citibank, N.A., Canadian branch: Citibank, N.A., Canadian branch provides a wide range of financial services to corporate customers in Canada.

Citibank Canada Investment Funds Limited: Citibank Canada Investment Funds Limited provides investment products and portfolio management services to Ultra High Net Worth clients.

Citi Cards Canada Inc.: Citi Cards Canada Inc. offers private label credit card programs in Canada for Canadian retailers under which it issues private label credit cards and services the accounts on which those cards are issued. Citi Cards Canada Inc. is also the account servicer for all Citi Commercial Cards accounts in Canada on which Citi Commercial Cards are issued. As the account servicer, Citi Cards Canada Inc. performs account servicing and related activities on Citi Commercial Cards accounts in Canada and administers the cardmember agreements governing those accounts.

OUR PRIVACY NOTICE: Our goal is to maintain your trust and confidence when handling personal information about you.

You Have Choices: As a Citi Canada customer, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives.

Security of Personal Information: The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

GENERAL: As you read this Privacy of Personal Information Statement (“**Privacy Statement**”), please remember that:

This Privacy Statement applies only to the following Citi Canada companies: Citibank Canada, Citibank, N.A., Canadian branch, Citibank Canada Investment Funds Limited and Citi Cards Canada Inc. These companies will be referred to as “**Citi Canada**” or, depending on the context, as “**we**”, “**our**”, or “**us**”, in this Privacy Statement. As well, “**you**” and “**your**” means an individual customer of Citi Canada.

We have designated a Privacy Officer for each of the Citi Canada companies listed above to ensure our compliance with applicable law, to receive and respond to customers’ questions and complaints, and to deal with requests for access to and rectification of personal information files.

Corporate customers and business customers will receive the privacy protections stated in this Privacy Statement, even though corporate and business accounts and services are not personal accounts or services.

CHANGES TO THIS PRIVACY STATEMENT: Any changes to this Privacy Statement and our information handling practices will be acknowledged in this Privacy Statement in a timely manner. We may add, modify or remove portions of this Privacy Statement when we feel that it is appropriate to do so. You may determine when this Privacy Statement was last updated by referring to the “Date Effective” displayed at the beginning of this Privacy Statement.

Categories of Personal Information We Collect and Hold: The nature of personal information we collect and hold about you may include, but is not limited to:

- information we receive from you through electronic or physical applications or other forms, such as name, gender, date of birth, address, home telephone number, mobile telephone number, personal email address, occupation, employer, assets, income, language preference and personal identification information (such as government-issued identification, social insurance number, driver’s license, passport and/or, where permitted, provincial health insurance card);
- information we receive from you on a voluntary basis when we are conducting a survey of your preferences, needs or interests;
- information about your transactions with us, our affiliates, or third parties, such as account numbers, account balances, payment history, and account activity;
- information about your device, your IP address, your location, your activities on Citi websites and your online preferences;
- behavioural elements of your biometric data about how you interact with our web-based access tools, including mobile applications, such as:
 - for web-based access tools (e.g., desktop or laptop): data about your mouse speed and movements, your keystroke rhythm, your keyboard usage characteristics, your touch events, your scrolling, your resizing events and your interactions with user interface (UI) fields.
 - for mobile applications: data about your swipe gestures, mobile screen taps, and screen orientation.
- information we receive from your employer;
- reports we receive from credit bureaus; and
- information we receive from program partners and service providers with or for whom we operate a Citi Commercial Cards program, a private label credit card program, or other financial services program.

We are not collecting any sensitive information from our affiliates or third parties, such as medical information, detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Personal Information: Citi Canada may use the personal information we collect about you for the following purposes:

1. to make decisions about applications, including identity verification and to detect and prevent fraud;
2. to make decisions about opening your account and/or evaluating your ongoing creditworthiness using automated decision-making processes. If you have any questions about an automated decision, you may contact Citi to obtain additional information about the decision process and the personal information used in making the decision;
3. in the case of behavioural biometric data collected using our web based access tools, including mobile applications, for risk mitigation, including fraud detection;
4. in the case of a Social Insurance Number, for tax reporting purposes, as identification for opening a deposit account or cashing a government cheque, and for credit bureau file matching purposes;
5. to evaluate credit worthiness, monitor, service and collect your account;
6. to respond to your inquiries about applications, accounts or other services;
7. to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
8. to contact you by email with offers, advertisements, and promotions which may be of interest to you (as permitted by law). You may unsubscribe at any time by using the "unsubscribe" link at the bottom of the email or by contacting the appropriate Citi Canada business at the address or telephone number listed in the *Contacting Citi Canada to File a Privacy Complaint or to Make a Request* section below;
9. to understand your needs and to offer products and services to meet those needs. We will not send you offers for products and services where we reasonably determine they are inappropriate for you or do not meet your needs;
10. to allow our affiliates and selected companies to promote their products and services to you. In the case of a private label credit card account, this also means that we will not assist our affiliates and selected companies in promoting products and services to you where we reasonably determine that they are inappropriate for you or do not meet your needs;
11. if you are a corporate or business account cardmember, to provide information on your account to your employer, its affiliates and its parent, in the case of a Mastercard account to Mastercard International Incorporated (and to its respective franchisees and licensees) and, in the case of a Visa account to Visa International Service Association as the case may be, for legitimate business purposes; and
12. such other purposes as we disclose in this Privacy Statement or that we identify to you from time to time or as permitted by law.

You may refuse or withdraw your consent to 8. above, as explained in this Privacy Statement. We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Disclosures of Your Personal Information: In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to Citi Canada or destroy it, without keeping a copy. These disclosures to service providers may be for:

- cheque and statement preparation, printing and other administrative services;
- card, security code and product/service issuance services;
- settlement and valuation services;
- data processing and market research services;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or third party service providers;
- financial, professional advisory and wealth management services;
- updating of information to credit bureaus;
- participating in payment systems and networks (e.g. the electronic networks that allow consumers to pay their credit card accounts, loans or other borrowing facilities with Citi Canada companies, or to pay for purchases from an eligible Citi Canada account with a debit card at the merchant point-of-sale), or participating in payment clearing and settlement systems in association with other financial institutions;
- servicing your transactions with merchants who accept a Citi Mastercard or private label credit card account as the method of payment for goods and services you purchase from them;
- managing various banking, financial and wealth management services benefits and various Citi Commercial Cards and private label credit card benefits, including insurance, loyalty and rewards programs;
- distributing information and/or promotional offers to you related to the products and services you have with Citi Canada;
- managing corporate and business cardmember accounts;
- bill payment services;
- debt collection activities on accounts you maintain with us;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the accounts, products and services you have with Citi Canada, or as otherwise permitted or required by law.

Some of our service providers (including affiliates and third parties acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed. While your



personal information is outside Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

If you have any questions or wish to obtain further written information about our policies and practices with respect to the collection, use, disclosure or storage of your personal information by service providers or affiliates outside of Canada, you may contact our Privacy Officer at canada.privacy.office@citi.com.

Affiliates With Whom We May Share Personal Information:

Our affiliates are the family of companies that form part of Citigroup. A complete list of our affiliates is available from the Privacy Officer at the address or telephone number indicated in the *Contacting Citi Canada to File a Privacy Complaint or to Make a Request* section of this Privacy Statement.

Citi Canada and its affiliates share with each other “marketing lists” - lists of customers who meet certain general, non-sensitive criteria. This information may include your name, address, category of income, gender, preferred language of communication, preferences, needs or interests. The sharing of such information is done in order to assist our affiliates to offer products and services that may be of interest to you. We are not sharing specific financial information or medical or other sensitive information with our affiliates, except when our affiliates are acting for us as service providers, when we are authorized by law or if we have your consent. If you prefer that we not share our marketing lists containing your name and information about you with our affiliates, you may contact us at the appropriate address or telephone number mentioned in the *Contacting Citi Canada to File a Privacy Complaint or to Make a Request* section below, allowing for a reasonable time for the withdrawal of your name and that information.

Some of our affiliates described above may be located outside of Canada, and personal information disclosed to those affiliates will be subject to the laws of the foreign jurisdictions where those affiliates are located.

Please note that if you use products or services offered by one or more Citi Canada companies (or by one or more of our Citigroup affiliates in Canada), you will need to separately notify each Citi Canada company (and each Citigroup affiliate in Canada) with whom you have a business relationship if you do not want such information shared with other Citi Canada companies (or Citigroup affiliates in Canada), or if you want to be removed from their marketing lists.

Third Parties With Whom We May Share Personal Information:

Note: *This section does not apply to individual customers of Citibank, N.A., Canadian branch unless they expressly give Citi consent to share their personal information with third parties for the purposes described in this section. Citibank, N.A., Canadian branch customers may give their consent by calling the Citibank, N.A., Canadian branch Privacy Officer at 1-888-245-1112.*

Specific to Citi Commercial Cards and private label credit card accounts, Citi Canada will share your personal information with third parties that provide call centre and cardholder account platform services for the purposes of responding to your inquiries, opening, administering, and serving the account. Additionally, Citi Canada will share your personal information with third parties that provide credit card and convenience cheque issuance services for

the purposes of issuing you a card or convenience cheques on the account.

From time to time, we may disclose personal information, through marketing lists, to selected companies or organizations to allow them to offer you directly, goods and services that may be of interest to you. These marketing lists contain very general and non-sensitive information such as names, addresses and telephone numbers, and categories of goods and services reflecting your preferences and interests. In no case will sensitive information about you, including specific financial data or credit ratings, be disclosed without your express positive consent. These selected companies and organizations will also be formally prohibited from disclosing the information to third parties or using it for another purpose without obtaining appropriate consent in advance.

If you prefer to be removed from the marketing lists we may share with third parties, you are free to opt-out at any time by contacting us at the appropriate address or telephone number listed below. Please allow a reasonable time for your withdrawal request to become effective.

Business Transactions: From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those business transactions. Personal information may be used by Citi Canada and disclosed to parties connected with certain business transactions, including the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Citi Canada's business or assets, for the purposes of evaluating and/or performing those proposed business transactions. These purposes may include:

- permitting those parties to determine whether to proceed or continue with a proposed business transaction;
- fulfilling inspection, reporting or audit requirements or obligations to those parties; and
- permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Privacy Statement.

Consent: Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services or by not responding to our offer to remove your personal information from our marketing list, in which case we assume that you consent). Consent may be given by your authorized representative. You may withdraw your consent at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact the appropriate Citi Canada business at the address or telephone number mentioned in the *Contacting Citi Canada to File a Privacy Complaint or to Make a Request* section below:

Note: *By opening, using or maintaining an account with us, you are consenting to us establishing and maintaining a file of personal information about you and obtaining and exchanging, from time to time, all information about you (including credit information) with our branches, affiliates and agents and with any credit reporting agency, credit bureau, person or corporation with whom you have or may have financial relations, government or regulatory agency, or supplier of services or benefits relating to your account for the purposes described in this Privacy Statement.*



Withdrawal or refusal of consent is subject to legal and contractual restrictions. Citi Canada can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity, and upon approval of your application, consent may not be withdrawn as it relates to processing, collecting or reporting your account information. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, complaint handling, internal training and recordkeeping purposes. As well, please remember that we and our affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number information you have provided to us.

Please also remember that during the term of a loan or credit facility you have with us, you may not withdraw your consent to our ongoing collection, use or disclosure of your personal information in connection with the loan or credit facility. This inability also applies to our continuing disclosure of your personal information to credit bureaus after your loan or credit facility has been retired. This ongoing disclosure assists with the maintenance, accuracy, completeness and integrity of the Canadian credit reporting system.

Accessing Your File: We will establish and maintain a file of personal information for each applicant and customer. In doing so, it is your responsibility to inform us of any changes whatsoever that could affect the status of your accounts or services with us. Your file will be kept by us and will be accessible by our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. This includes, but is not limited to: Front Office, Bankers, Investment Counsellors, Customer Service Teams, Fraud Teams, Operations, Legal, Compliance and Auditors. You have the right to access your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can obtain the *Customer Access to Personal Information Request* form from us by contacting the appropriate Citi Canada company at the address or telephone number mentioned below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within 30 days.

Please note that in certain circumstances, we may not be able to provide you with access to specific portions of file information about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing our confidential or proprietary information;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information: Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place at Citi Canada to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

Each Citi Canada employee is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a Code of Conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law.

Contacting Citi Canada to File a Privacy Complaint or to Make a Request:

To file a privacy complaint, an opt-out request, to request access to your personal information, to report incorrect personal information, or to obtain information about our policies and practices including our use of third parties and affiliates with whom we share your personal information, please contact us at the following address or telephone number:

Citibank Canada Accounts:

Citibank Canada
123 Front Street West, Suite 1600
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-888-245-1112

Citi Commercial Cards Accounts:

Citi Commercial Cards, Citibank Canada
5900 Hurontario Rd
Mississauga, ON L5R 0B8
Attention: Complaints Officer – Commercial Cards
Telephone: 1-888-834-2484

Citibank, N.A., Canadian branch Accounts:

Citibank, N.A., Canadian branch
123 Front Street West, Suite 1600
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-888-245-1112

Private Banking Services:

Citi Private Bank, Citibank Canada
and/or Citibank Canada Investment Funds Limited
123 Front Street, Suite 2000
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-888-245-1112

Citi Cards Canada Inc. – Private Label Credit Card Accounts:

Citi Cards Canada Inc.



P.O. Box 2052, Station B
Mississauga, Ontario L4Y 0B5
Attention: Privacy Officer

Telephone:
Retail Private Label: 1-800-233-8557
Home Depot Credit Services: 1-800-747-3787

To forward a privacy complaint by email for any of the Citi Canada companies mentioned in this Privacy Statement, please email us at: canada.privacy.office@citi.com.

We will investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

Note: You must file an opt-out request with each Citi Canada company to which you want an opt-out request to apply. If you have already filed an opt-out request in the past at a Citi Canada company with whom you have an account or service, there is no need to file another opt-out request with that Citi Canada company.

European Union (EU) General Data Protection Regulation 2016/679 ("GDPR"), the Swiss Federal Data Protection Act (FDPA) or United Kingdom's (UK) Data Protection Act 2018 or UK GDPR (together the UK Data Protection Legislation): may apply to you if you are a resident of the European Economic Area, UK, Jersey or Switzerland or if personal data in relation to any product or service you enter into with Citi Canada is processed by a Citi entity based in the European Economic Area, UK, Jersey or Switzerland. In the event that the GDPR, FDPA or UK Data Protection Legislation applies to your personal data or if you are a resident in or are otherwise impacted by privacy legislation of any other jurisdiction, please consult your account/service terms for specific details.

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