

Citi Foundation Privacy Notice

Effective Date: June 30th, 2025

Scope and Applicability

This Citi Foundation Privacy Notice (“Notice”) describes how Citi Foundation (also referred to as “we”, “us”, or “our”) processes personal information in the course of reviewing and evaluating grant requests, providing grants or making recommendations about the provision of grants, and other philanthropic-related activities (collectively “Services”).

Kindly read this Notice in its entirety and be sure to consult any applicable Supplemental Provisions specific to your jurisdiction. Please be aware that a Supplement may not be required for all countries and territories.

This document is directed to individuals whose personal information is subject to processing in connection with their organization’s engagement with our Services. It delineates the fundamental principles governing the processing of personal information, outlines privacy rights, and provides guidance on how to exercise them. It is essential to clarify that this document is not intended, nor should it be interpreted, as a binding contract enforceable against individuals or data subjects. Nor does it supersede any contract or agreement between you or your organization and Citi.

Finally, please note that other Citi entities or businesses may have their own Privacy Notices, and this document does not serve as a replacement for other Privacy Statements or Notices tailored for specific purposes or distinct business units catering to consumers, private bank customers, or internal functions and services. We encourage you to carefully review the Privacy Notice of each Citi entity or business with which you interact.

Definitions

In this Privacy Notice we use the following terms:

“You” means any individual or natural person whose information or personal data we process in relation to your organization’s engagement with the Citi Foundation.

“Your Organization” is the corporation or institution that has applied to or otherwise engaged with Citi Foundation and with which you are associated as an employee, authorized representative, director, shareholder, client or otherwise.

“Personal Information” or **“Personal Data”** are equivalent terms to mean any information or data:

- that identifies or can be used to identify you.
- that relates to, describes, is capable of being associated with, or could reasonably be linked (directly or indirectly) with you; or (alternatively)
- that can be used to authenticate you or provide access to application or grant information

Changes to this Privacy Notice

We may modify this Notice from time to time. When we do, we will post the current version on this site, and we will revise the effective date located at the top of this page. We encourage you to periodically review this Notice so you are aware of our current privacy practices.

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1. ENTITY RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION

Citi Foundation is responsible for determining how your Personal Information is collected, the purposes the information is collected for, and how it will be processed. This is referred to as a “Data Controller” in some jurisdictions.

2. SOURCES OF PERSONAL INFORMATION

We may collect your Personal Information in the following ways:

From Your Organization, such as when you are listed as a person of contact on your organization’s grant application.

Directly from You, such as when you communicate with us (either verbally or electronically), attend a Citi Foundation event, or otherwise provide us with your Personal Information.

Automatically, in some instances we may automatically collect certain types of information about you and your device when you visit our website or start a grant application. We may do so using technologies such as “cookies” or web beacons.

From Other Citi Entities, including where other Citi-affiliated entities participate in a required screening process.

From third parties, including from our service providers that manage our grant application platform, and for required fraud or sanctions checks, international organizations, and other sources we consult when you apply for a grant.

3. CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND PROCESS

Citi Foundation collects personal information about you, for the purposes indicated in this Notice. The categories of personal information that we process, with their elements include:

- Contact details: such as your name, organization, title, within Your Organization.
- Business contact details in Your Organization, such as business and email address, and your telephone number.
- Your privacy preferences, including your preferences and methods of communications, corporate marketing options, cookie and tracker choices, and your service preferences.
- Information required for specific legal or regulatory purposes including anti-money laundering (AML) and/or sanctions and screening processes (e.g. information on your controlling persons such as name, title, country of residence)
- Personal Information gathered from arrangements Your Organization has with us.
- Your direct interactions with us, such as communications via email or in person, attendance at Citi Foundation events, and interaction with us on social media or in other media sources.

- Inferences drawn from any of the Personal Information described above to create a profile about an individual's preferences, behavior, characteristics, and attitudes.

Some of the information we collect may be considered “sensitive personal information” under certain laws, such as diversity-related information including race, religion, sexual orientation, or other categories. Where required, Citi Foundation will obtain your consent to process this information unless otherwise permitted by law.

Cookies and Other Tools

Our website uses cookies and other automated tools. A cookie is a text-only string that is set on your browser. These tools are used to help us better understand, customize, and improve user experience with our website and Services.

Do Not Track: Most web browsers allow you to change your cookies options to accept all, some, or no cookies or to warn before accepting cookies; however, setting your web browser to not accept any cookies may inhibit the performance of our website. Our Site currently responds to browser do not track signals.

4. PURPOSES AND USES OF PERSONAL INFORMATION

We use your Personal Information for the following purposes:

- To provide your organization with our Services, such as reviewing grant applications, awarding grants, making recommendations about grants or funding, or otherwise facilitating your organization's application.
- To communicate with you, including to verify your organization's application, and inform you about Citi Foundation updates and other information that may be of interest to you or your organization.
- For public relations purposes, we may use your Personal Information in a limited capacity for public relations purposes such as press releases. We will aim to give you advance notice ahead of time prior to publishing any press where you may be identified directly.
- For crime and fraud prevention, including where we run required sanctions or background checks and other similar activities.
- To comply with law, we may process your Personal Information to comply with legal and regulatory obligations including AML compliance, KYC checks, and defending ourselves in litigations and investigations.

We may aggregate, anonymize and/or de-identify data we collect and use it for any purpose, including product and service development and improvement activities.

Citi Foundation does not sell or share your Personal information with third parties for their advertising or other commercial purposes.

Artificial Intelligence, Automated Decision-Making and Profiling

Citi Foundation does not delegate control or decision-making functions to automated processing means (including Artificial Intelligence) and does not engage in profiling that may result in legal or similarly significant effects. Nevertheless, we may use artificial intelligence to monitor transaction data, to

ensure the consistency and correctness of outputs, detect and prevent illegal activities, for risk management, and/or as an information tool for our personnel.

5. LAWFUL BASIS OF DATA PROCESSING

The lawful basis that we rely on for data processing vary, depending on the applicable law in the location where we provide our services. These include:

- **Consent:** We use consent as a lawful basis, subject to conditions applicable in the country where consent is collected, only where:
 - We are required by law to obtain consent or
 - Where consent can be assumed or inferred from your conduct

You may withdraw your consent at any time; however, if you do so, we may no longer be able to provide you with our Services.

- **Performance or Delivery of a contract**
 - We will use this lawful basis for processing if:
 - We have an agreement with you (or with Your Organization, for your benefit) and we need to process your personal data in order to deliver on the agreement. For example, to process grant payments.
 - You have asked us to take steps in order to enter into an agreement with us or Your Organization.

In countries where we process personal data under consent as legal basis, we will infer it from your continued use of our services, unless we are under a legal obligation to collect positive consent.

- **Legitimate interests**
 - We will use this lawful basis for processing if:
 - We have a legitimate business purpose for processing your personal information; and
 - Processing your personal information is necessary to achieve this purpose; and
 - Our legitimate business interest is not overridden by your individual interests, rights and freedoms.
- **Compliance with a legal obligation**
 - We will use this lawful basis for processing if we need to process your personal information to comply with a legal obligation. This may include without limitation:
 - Providing information on request to government and regulatory bodies securities and commodities markets, securities brokers, and our intermediaries or counterparties
 - Conducting regulatory compliance activities such as: audit and reporting, accounting and tax records, prevention of

fraud and other forms of economic crime, complying with international sanctions and anti-terrorism legislation background or KYC verification and screening of senior government officers and politically exposed persons (PEPs)

When we collect and process sensitive personal information, or Special Categories of Information, we will do so by obtaining your explicit consent unless the law allows us to rely on prescribed exceptions:

- If the processing of personal data is clearly needed for your benefit, and your consent for its collection, use or disclosure cannot be obtained in a timely manner, or where you would not be reasonably expected to withhold consent.
- If your consent is for a substantial public interest or in the legitimate interest of another person (including us) provided that processing must not extend to what is reasonable to provide a legitimate outcome and the protected interest outweighs any adverse effects of the processing your personal information.

6. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION IF REQUIRED

We may require certain data to execute our processes, fulfil our contractual obligations, or to comply with legal obligations. If you choose not to provide this required data, it may impact our ability to provide you with our services effectively. For example:

- Access Management: Without accurate contact information, we may not be able to manage your accounts on the Fluxx platform effectively, which could impact your access to our platform. As Fluxx is a third -party platform, we recommend you review Fluxx's Privacy Policy for information about how Fluxx processes your personal information.
- Compliance: Failure to provide necessary legal and regulatory information may result in non-compliance with applicable laws and regulations, which could have legal consequences for your institution.

7. YOUR PRIVACY OR DATA PROTECTION RIGHTS

You may have rights over your personal information depending upon the jurisdiction where you reside. Most jurisdictions grant 4 basic rights: Access, Rectification, Cancellation and Objection (by their initials, the so-called **ARCO** rights).

You can [CONTACT US](#) to request any of the following rights:

- Right to know / be informed about 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
- Right to access your information and obtain a copy of the personal

information we hold about you

- Right to rectify inaccurate information
- Right to erase or delete your information (or “right to be forgotten”)
- Right to transfer your information to another organization (i.e., the right to data portability)
- Right to restrict processing of your personal information
- Right to object to processing.
- Right to withdraw your consent for processing your personal information
- You can [contact us](#) to withdraw your consent for processing your personal information.

If you withdraw your consent for processing of your personal information and it is necessary for us to conclude a transaction or for legal and regulatory purposes, then we may not be able to provide you with the relevant products and / or services that require such consent. There may be situations where we are unable to stop processing your personal information after you withdraw your consent, where it is a legal requirement for us to continue using or storing certain information. If this is the case, we will clearly explain the reason we are unable to stop using (and storing) your personal information.

Citi Foundation may not always be able to provide all requested information or fulfil other rights where certain exceptions apply to a privacy rights request. Additionally, we may not be able to provide you or your organization with our services, for example if you direct us to delete your information before we have made a decision about a grant request. In our reply, 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 need to verify your identity prior to honoring your rights request. We will verify your identity by asking you to provide personal information we may have previously collected about you. We will respond to your request within the timeframes provided under applicable law.

We will always respond to your request within the timeframes provided under applicable law.

8. DISCLOSURES AND RECIPIENTS OF PERSONAL INFORMATION

We may disclose personal information to third parties (including our affiliates) confidentially, and where necessary, as follows:

- to Your Organization, in connection to the services that we provide to them.
- To our affiliates or internal business groups, who receive or have access to personal information about you, including where screening is required.
- To Citi Foundation’s service providers who assist business functions such as application processing, fraud and money laundering monitoring.

- To professional services providers: auditors, insurers, legal counsel, and to competent regulatory, tax, governmental or jurisdictional authorities, including central banks and financial regulators, and to the courts of any competent jurisdiction, domestic or foreign.
- To law enforcement bodies where necessary to facilitate the prevention or detection of crime or fraud.

We will only share your information for the purposes outlined in the Section 4 (“**Purposes and Use of Personal Information**”) in this Notice.

9. INTERNATIONAL DATA TRANSFERS OF PERSONAL INFORMATION

We operate on a global basis and therefore your personal information may be stored and processed in a country or territory other than that in which Your Organization is located, and backed up and further processed (unless your country or territory has data localization laws) in global service centres, for operational and regulatory purposes.

Citi Foundation and its service providers may transfer your personal information to countries and territories that may not provide legal protection that is equivalent to that offered in the place of business or establishment of Your Organization. For this reason, we take steps to ensure that your Personal Information is protected in all locations where it is processed by using our own affiliate organizations, or if otherwise, by introducing appropriate contractual and technical and operational means..

10. STORAGE AND RETENTION (ARCHIVING) OF PERSONAL INFORMATION

We process personal information only for the length of time that is necessary to carry out the purposes for which personal data was collected and in accordance with our legal and regulatory obligations. When the retention of your personal information is no longer necessary, we will securely dispose of it, or we will irreversibly anonymize it, so that it is no longer personal data.

11. SECURITY

Citi takes reasonable and appropriate steps to preserve the security, confidentiality, integrity, and availability of personal information. However, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting Personal Information over the Internet. We cannot guarantee the security of personal information outside our networks.

12. MINORS (CHILDREN)

Our services are intended for non-profit charitable organizations and are not designed for persons that cannot enter into business transactions in their own name, including children.

We do not knowingly collect without consent from their parents or guardians, personal information from persons under the age of 16. We do not sell, share, or use their data for social media and we do not have targeted advertising directed to children. If you have reason to believe that information about a child has been provided to us in error, please [contact us](#).

13. For California Residents

These California Supplemental Provisions supplement the information contained in the Notice and apply solely to individuals who have rights under the California Privacy Rights Act (“CPRA”) (“consumers” or “you”). Unless otherwise defined in the Notice, any terms defined in this Supplement have the meaning used in the CPRA.

Summary of Personal Information Handling Practices

Citi provides in the chart below, a summary of our prior 12-month personal information handling practices with respect to individuals associated with Citi Foundation. Citi Foundation has not sold or shared, as defined by the California Consumer Privacy Act, any of your personal information to third parties.

Category of Personal Information	Sources	Business or Commercial Purpose of Processing	Recipients of your Personal Information
Identifiers such as your name, organization, title	From your organization, directly from you, from other Citi entities	To provide your organization with our services, to comply with our legal obligations	Service providers
Business contact details, such as business email address and phone number	From your organization, directly from you, from other Citi entities	To provide your organization with our services, to communicate with you	Service providers
Privacy preferences including methods of communicating, marketing options, cookie and tracker choices, and service preferences	From your organization, directly from you, automatically	To provide your organization with our services, to communicate with you, to comply with our legal obligations	Service providers
Information required for legal or regulatory purposes including AML and/or sanctions processes	From your organization, directly from you, from third parties, from other Citi entities	To provide your organization with our services, to comply with our legal obligations, and for crime and fraud prevention	To your organization, service providers, law enforcement bodies where necessary, affiliates or internal business groups
Direct communications with us	From your organization, directly from you	To provide your organization with our services	To your organization, service providers

Any other personal information gathered from arrangements your organization has with us	From your organization, directly from you, from third parties, from other Citi entities	To provide your organization with our services	To your organization, service providers
Inferences drawn from any of the personal information described above	From your organization, directly from you, from third parties, from other Citi entities	To provide your organization with our services, to comply with our legal obligations, and for crime and fraud prevention	To your organization, service providers

Retention

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.

Selling or Sharing 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.

Do Not Track

Some browsers have a do not track feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not respond to browser do not track signals.

Contact Us

If you have any questions about this Supplement, the ways in which Citi collects and processes your personal information, please visit [Citi Privacy Hub](#) or e-mail us at foundationsupport@citi.com.