



Last Updated: 13 January 2025

# UAE and DIFC Supplement to Citi Institutional Clients Privacy Notice

<b>1. Purpose of this notice</b>	<p>Citibank N.A. (UAE branch), Citibank N.A. (DIFC branch), and Citigroup Global Markets Limited (DIFC branch) (each, Citi or 'we') provide commercial and corporate banking products, international services and access to global securities markets to corporations, financial institutions and government entities. This privacy notice applies to the collection and use ("processing") of personal data by Citi in the UAE and the DIFC in connection with services provided to institutional clients in connection to payments, liquidity, collections, receivables, trade finance (including letters of credit, guarantees and supply-chain finance, Foreign Exchange (FX hedging) related to corporate banking and business financial services]. It applies across the UAE (onshore) and Dubai International Financial Centre (DIFC) and other jurisdictions from where UAE /DIFC services are provided.</p> <p>This UAE and DIFC Privacy Supplement should be read together with the Citi Institutional Clients Privacy Notice available at <a href="https://www.citigroup.com/global/privacy/institutional-clients">https://www.citigroup.com/global/privacy/institutional-clients</a>,</p> <p>It covers personal data relating to (i) individuals acting for or on behalf of corporate clients and their corporate organizations ("your organization"), (ii) recipients, payers and payees in any payment operations; (iii) directors, principals, officers, shareholders and beneficial owners of corporate clients, counterparties and service recipients, and (iv) all other employees of those organizations with whom Citi interacts (we refer to any of these persons as 'you'). It details our data practices, informs you of your privacy and data protection rights and of ways to exercise them.</p> <p>It is important that you read this notice, together with any other disclosures provided when we are collecting or processing personal information about you.</p>
<b>2. Controllers and their contact details</b>	<p><b>Data Controllers:</b> The Citi entities responsible for deciding how we hold and use information about you and are the 'data controllers' for the purposes of (1) the Federal Decree-Law No. 45 of 2021 on Personal Data Protection ("PDPL") and (2) the DIFC Law No. 5 of 2020 (as modified by the DIFC Amendment Law No. 1 of 2025). If your organization is a customer or service recipient of Citi in the UAE your data controller is the Citi entity you or your organization contract or engage with.</p> <p><b>In the United Arab Emirates (Onshore branch): Citibank N.A. (UAE);</b></p> <p><b>In the Dubai International Financial Centre: Citibank N.A. (DIFC branch) and Citigroup Global Markets Limited (DIFC Branch)</b></p> <p>If you wish to exercise any individual rights under this Privacy Notice you can use the form in this link <a href="https://www.citigroup.com/global/privacy/contact-us">https://www.citigroup.com/global/privacy/contact-us</a></p> <p>Alternatively, you can mail Citi to the addresses indicated below:</p> <p><b>In the United Arab Emirates (Onshore branch)</b> <b>Citibank N.A. (UAE)</b> Oud Metha Tower Opposite WAFI City, Sheikh Rashid Road, Dubai, United Arab Emirates</p>

	<p><b>In the Dubai International Financial Centre Citibank N.A. (DIFC Branch) and Citigroup Global Markets Limited (DIFC Branch)</b> Dubai International Financial Center Building 2, Floor 3 &amp; 7 Dubai, United Arab Emirates</p> <p>You have a right to complain: If you have any questions or complaints in respect of how we process your personal data, you may also contact our independent Data Protection Officer by Email at: <a href="mailto:CitiUAEDPO@imceu.eu.smb.com">CitiUAEDPO@imceu.eu.smb.com</a> Or at the postal addresses indicated above FAO UAE Data Protection Officer. Telephone+971 4 311 4000</p>
<p><b>3. What information we collect and sources of data</b></p>	<p><b>Information we collect Directly</b></p> <p>We directly collect and process personal data that helps us provide services to you and your organization, and to manage our corporate client relationships. This is information that you provide us directly or that we learn about you from the use of our systems (e.g. CitiDirect) and mobile applications, and from our communications.</p> <p>Sometimes we may collect limited biometric or behavioral data from your interactions with our systems, to keep your accounts secure and to provide information that is relevant to you.</p> <p>Our websites and mobile apps (including CitiDirect) provide online cookie, tracking options, and location sharing settings that you can opt-in our out of, anytime. We do not use or share your personal data in ways that can identify you, or any transactions you have made.</p> <p><b>Indirect Collection</b></p> <p>We frequently receive personal data indirectly from corporate clients, counterparties, correspondent banks, and other intermediaries in any transaction (e.g., payer, payee, applicant/beneficiary in trade instruments). This includes your date of birth, nationality, title and employee ID, job description, business contact, home and/or business address and telephone number and other information, (for example account and branch identification numbers, and a copy of your government ID or passport), as required for KYC, AML and/ or sanctions vetting purposes. We also gather information from public sources, including credit or fraud checking agencies, international sanctions lists, reference agencies websites and similar; In all such cases, Citi acts as a controller of that data and provides. We are required to notify you of the information obtain and process, in this privacy notice.</p> <p><b>Categories of Personal Data</b></p> <p>Citi processes the following types of personal data:</p> <ul style="list-style-type: none"> <li>• Personal contact details for home and/or business such as name, title, addresses, telephone numbers, telefax and email addresses;</li> <li>• Names and titles of officers, principals, directors, shareholders, ultimate beneficiaries, payment beneficiaries, and individuals related to counterparties, or similar entities in a payment chain, and their employment other relationship with their organization;</li> <li>• Biographical information as dates of birth, gender, nationality, marital status, relationship with a client organization, counterparty or beneficiary, including payment routing details and tax and residence status employment, credit, property information; specimen signatures and copies of passports, and</li> <li>• information required for know your customer screening (KYC,) anti-money laundering and counter-terrorism financing laws (AML), international sanctions screening, as part of onboarding ongoing due diligence,</li> </ul>

4. Purposes of processing and Lawful Grounds	Purpose / Processing Activity	Lawful Basis	Legitimate Interest (where relied upon)
("Why do we process your personal data?")	Client onboarding; mandate set-up; managing cash & trade accounts and services	Consent; Contractual necessity; legal obligation (KYC- related) and substantial public interest	Efficient program and relationship management; and detection, investigation or prevention of crime
	Payment initiation, collection and reconciliation, correspondent banking services and messaging;	Consent; Contractual necessity; legal obligation; and legitimate interests	Integrity and resilience of payment systems
	Trade finance operations i.e. Letter of Credit issuances, confirmations, collections, guarantees, Supply Chain Finance and due diligence on applicants (buyers) and beneficiaries (sellers)	Contractual necessity; legal obligation; and legitimate interests.	Secure facilitation of international trade flows
	Fraud monitoring, detection, prevention and investigation; and incident response	Legitimate interest; legal obligation (or alternative legitimate interest where applicable)	Protecting our clients, our business and the financial system, Where we cooperate with, respond to requests from, and report transactions and/or other activity to, government, tax or regulatory bodies or other intermediaries or counterparties, courts or other third parties, in relation to DIFC data, Citi will adhere to the stringent procedures required in accordance with DIFC data protection laws;
	Know-your-customer (KYC), anti-money laundering and countering terrorism financing (AML/CTF), prevention checks and sanctions compliance	Legal obligation; substantial public interest	Ensuring compliance with financial-crime regulations. Sound corporate governance and risk oversight
	Training and quality assurance (including call recording), to address complaints or incidents	Legitimate interest	Ensuring service quality and staff competence, improving client experience and service performance
	Information technology operations and management, IT testing, security and system maintenance, and analysis of the use of products and services, for risk assessment and control	Legitimate interest; legal obligation	Ensuring confidentiality and availability of systems
	Regulatory reporting and response to authorities	Legal obligation	—
	Service Communications, queries and complaints handling	Contractual necessity; and legitimate interests	Service quality assurance, training and dispute resolution.
	Marketing to corporate clients	Legitimate interest	Developing business and client relationships
	Litigation, enforcement of	Legitimate interest	Protection of Citi's legal

	rights and defense of claims		rights and interests
	Record retention and archival	Legal obligation; legitimate interest	Meeting statutory retention and evidentiary requirements, and defending claims
<p>Where we process your personal data to comply with laws and regulations, we sometimes do more than the minimum necessary, as we also have a legitimate interest in cooperating with financial regulators and authorities globally, complying with local and foreign laws (in particular dealing with detection, investigation and prevention of international financial crime), protecting our businesses and the integrity of the financial system.</p> <p>When operating in the UAE (onshore), we rely on consent as the legal basis for processing, unless where authorized to process your personal data in any of the situations in Article 4 of the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection ("PDPL"). Where consent is our lawful basis, you can withdraw or revoke it at any time, and we will cease processing your data from that moment going forward. However please note that withdrawing or revoking your consent will not have retroactive effect and will not invalidate any transactions. We will also continue to retain personal data and evidence of your earlier consent (and later revocation) as required by our financial regulators.</p> <p>If we request you to provide your consent, we will make clear to you if it is our legal basis at the point of gathering. For example, your consent may be needed to: (a) initiate any contract or transaction between us that will then enable us to use further lawful basis (e.g. contract necessity); (b) to send you commercial communications or marketing about Citi services, that can be of interest to you and your organization, (c) where we record and/or monitor service chats, and voice or video conversations, for service quality, security, fraud monitoring, staff training, and to deal with complaints, disputes and to prevent criminal activity. To the extent permitted by law, these recordings are our sole property.</p> <p>If you do not provide consent or facilitate us information when we request it, we may not be able to fulfill a specific instruction, nor provide or continue providing a service to you or your organization.</p>			
<b>3. Processing of Special Categories of Personal Data (DIFC Data Protection Law)</b>	<p>Where required in the context of anti-money laundering, counter-terrorist financing obligations or the prevention, detection or prosecution of financial and other forms of crime; (including racial and ethnic origin, communal origin, political or trade union affiliations, health and biometric information and/or criminal offence data. We may also process religious information where it is part of your name or title. We may also process special categories of data in circumstances where we are under financial regulatory obligations or equality/disability legislation that requires us to provide accommodations (dietary, mobility, hearing, visual technologies, etc.)</p> <p>Please note that if you interact with our systems and applications, by using the biometric data stored on your mobile device for authentication, your data remains stored in your device, and we do not have access to it.</p> <p>We may however, also use biometric information for information security purposes to detect threat actors, or whether you are being impersonated (e.g. strokes and mouse movements, and 'prove you are human' tests) in your interaction with our systems and applications.</p>		

<p><b>4. Data sharing: who are the recipients of your personal data?</b></p>	<p>Your disclose your personal data to the minimum extent necessary to provide Citi's products and services to institutional clients in the UAE and DIFC, including:</p> <ul style="list-style-type: none"> <li>- To your organization or its affiliates in connection with the banking, business and financial products and services that we provide to them.</li> <li>- To other Citi entities, as summarized in the table below:</li> </ul>																									
<table border="1"> <thead> <tr> <th data-bbox="451 394 792 447">Recipient/Affiliate</th> <th data-bbox="792 394 1076 447">Country</th> <th data-bbox="1076 394 1437 447">Type/Purpose of Disclosure</th> </tr> </thead> <tbody> <tr> <td data-bbox="451 447 792 520">Citibank N.A.</td> <td data-bbox="792 447 1076 520">United States</td> <td data-bbox="1076 447 1437 520">Group oversight and processing support</td> </tr> <tr> <td data-bbox="451 520 792 573">Citibank Singapore Ltd.</td> <td data-bbox="792 520 1076 573">Singapore*</td> <td data-bbox="1076 520 1437 573">Operational Support</td> </tr> <tr> <td data-bbox="451 573 792 646">Citibank India Private Ltd.</td> <td data-bbox="792 573 1076 646">India</td> <td data-bbox="1076 573 1437 646">Technology Services</td> </tr> <tr> <td data-bbox="451 646 792 720">Citi Technology Services Ltd</td> <td data-bbox="792 646 1076 720">India</td> <td data-bbox="1076 646 1437 720">Infrastructure Support</td> </tr> <tr> <td data-bbox="451 720 792 793">Citibank Switzerland AG</td> <td data-bbox="792 720 1076 793">Switzerland*</td> <td data-bbox="1076 720 1437 793">Operational Support. System encryption</td> </tr> <tr> <td data-bbox="451 793 792 919">Citibank Europe plc</td> <td data-bbox="792 793 1076 919">Ireland (Main office)* Hesse, Germany*, United Kingdom* and Poland*</td> <td data-bbox="1076 793 1437 919">Payments management and IT service operations</td> </tr> <tr> <td data-bbox="451 919 792 993">Citibank N.A. (London Branch)</td> <td data-bbox="792 919 1076 993">United Kingdom*</td> <td data-bbox="1076 919 1437 993">Shared service operations and processing support</td> </tr> </tbody> </table>			Recipient/Affiliate	Country	Type/Purpose of Disclosure	Citibank N.A.	United States	Group oversight and processing support	Citibank Singapore Ltd.	Singapore*	Operational Support	Citibank India Private Ltd.	India	Technology Services	Citi Technology Services Ltd	India	Infrastructure Support	Citibank Switzerland AG	Switzerland*	Operational Support. System encryption	Citibank Europe plc	Ireland (Main office)* Hesse, Germany*, United Kingdom* and Poland*	Payments management and IT service operations	Citibank N.A. (London Branch)	United Kingdom*	Shared service operations and processing support
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<p>* Certain of these jurisdictions are recognized by the DIFC Commissioner for Data Protection as providing an adequate level of data protection in accordance with DIFC Law 5 of 2020. A full list of all such countries is available on: <a href="https://www.difc.com/business/registrars-and-commissioners/commissioner-of-data-protection">https://www.difc.com/business/registrars-and-commissioners/commissioner-of-data-protection</a></p>																										

	<ul style="list-style-type: none"> <li>• to authorized third parties or intermediaries that form part of a payment system infrastructure or which otherwise facilitate payments, including:             <ul style="list-style-type: none"> <li>• Merchants, payment processors and aggregators, payment and banking counterparties, agent and correspondent banks, communications and customer support service providers, and payment or trade platform services providers, clearing systems or similar fulfilment entities; ; digital or electronic wallets; and similar entities and other persons from whom we receive, or to whom we make, payments on our clients' behalf;</li> <li>• to export credit agencies, multilateral agencies, development finance institutions, sovereign funds and government investment institutions, their supervisory authorities and their agents, insurers, due diligence service providers and credit assessors, in each case in connection with products and services that are linked to services we provide to Your Organization;</li> </ul> </li> <li>• we may also share your information with government investment institutions, their supervisory authorities and their agents, insurers, due diligence service providers and credit assessors, in each case in connection with products and services that are linked to Your Organization;</li> </ul> <p>Where DIFC data is in scope, Citi will in all cases adhere to the stringent procedures required in accordance with DIFC data protection laws;</p> <p><b>In certain circumstances, we may also share your information with:</b></p> <ul style="list-style-type: none"> <li>- professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);</li> <li>• to competent government and law enforcement authorities and other persons involved in, or contemplating legal proceedings;</li> <li>• to competent regulatory, law enforcement, tax or other governmental authorities, and to courts or other tribunals in any competent jurisdiction; law enforcement, tax or other governmental authorities, and to courts or other tribunals in any competent jurisdiction; and</li> <li>• to prospective buyers as part of a divestiture, merger or other disposal of any of our business or assets, merger or other disposal of any of our business or assets.</li> </ul> <p>Where your personal data is transferred to, stored or processed in a country that is not recognized as providing an adequate level of data protection, such transfers, storage or processing shall be undertaken on the basis of: (a) that the transfer, storage or processing is necessary for the performance of Citi's contract with you; (b) that the transfer, storage or processing is necessary for the conclusion or performance of a contract that is in your interest; or (c) on the basis of your consent. Where any such transfer, storage or processing is undertaken on the basis of your consent, you are entitled to withdraw your consent at any time.</p>
<p><b>5. Artificial Intelligence, Automated Decision-Making and Profiling</b></p>	<p>Citi 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 use artificial intelligence to monitor transaction data, to ensure the consistency and correctness of outputs, detect and prevent illegal activities, for risk management and investment analysis, as an information support tool for our personnel. We use fully automated means, for example in algorithmic securities trading, solely where all information is de-personalized.</p> <p>If your organization is a Citi client, depending on your digital marketing choices, we may create AI profiles to offer you products targeted to your organization. Our marketing communications have links to change your preferences or suppress further notifications.</p> <p>We do not use your personal data to train third party models. However, where processing involves machine learning or statistical models, it may not always be technically feasible to remove all traces of an individual's data; however, we will take reasonable steps to ensure rights are respected to the extent required by law.</p>

<p><b>6. Data Retention- How long to we keep your personal data?</b></p>	<p>We retain your personal data as is necessary for the purposes described in this Privacy Notice, in accordance with legal and regulatory requirements, typically seven years after you cease to be a contact person for your organization, or upon account closure, unless longer retention is required to establish or defend legal claims, or respond to regulatory or law enforcement investigations.</p> <p>When the retention of your personal data is no longer necessary, we will securely destroy it, or we will anonymize it irreversibly, so that it is no longer personal data.</p>
<p><b>7. Your rights: What are your rights in relation to your personal data?</b></p>	<p>You have the rights to be informed: in the event of a data breach, we will notify you and the UAE Data Office of any personal data breach that is likely to result in a risk to your privacy, confidentiality and security, and provide you with ways to mitigate such risks.</p> <p>You have the rights to access your information: You have the right to request, at no charge, information about (a) the categories of personal data processed, (b) the purposes of the processing, (c) automated decision-making, including profiling, (d) target sectors or enterprises with whom personal data are shared inside and outside the UAE, and (e) controls and standards relating to the duration of storage and archiving of personal data. This Privacy Notice has been drafted with the intention of declaring how we lawfully process your personal information. However, if you have any questions or concerns, you may communicate with Citi using the contact details provided in Section 1 of this Privacy Notice.</p> <p>You also have the rights of (i) correction or rectification of inaccurate information, or (ii) erasure of personal data where the processing of your personal data is no longer necessary, where you have withdrawn your consent (and we have no legitimate grounds for its continued storing or processing, e.g. a legal obligation to retain records) and (iii) You may also restrict our processing of your personal data or ask us to stop processing.</p> <p>To exercise these rights please use the contact details provided in Section 2 of this Privacy Notice.</p> <p><b>If you believe your personal data was mishandled, or you have concerns regarding access to, or use of your information, you may contact our independent Data Protection Officer.</b></p> <p><b>Citigroup Data Protection Officer (UAE)</b>  Oud Metha Tower  Opposite WAFI City,  Sheikh Rashid Road,  Dubai, United Arab Emirates</p> <p>Email : <a href="mailto:CitiUAEDPO@imceu.eu.ssmc.com">CitiUAEDPO@imceu.eu.ssmc.com</a>.</p> <p><b>You may also file a complaint to</b></p> <ul style="list-style-type: none"> <li><b>(i) UAE Onshore: The Central Bank of the United Arab Emirates (in regard to consumer protection matters).</b></li> <li><b>(ii) UAE DIFC: The DIFC Commissioner of Data Protection, on <a href="http://www.difc.com/business/registrars-and-commissioners/commissioner-of-data-protection">www.difc.com/business/registrars-and-commissioners/commissioner-of-data-protection</a> (click on the section 'rights and redress information').</b></li> </ul>
<p><b>8. Data security</b></p>	<p>We have put in place and implemented appropriate technical and organizational measures to provide a high information security level that is appropriate to the risks associated with a large financial institution, and in accordance with recognized international standards including ISO/IEC 27001:2013 to prevent your personal information being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.</p> <p>In addition, apply appropriate safeguards, including strict role-based access, encryption in transit and at rest, operational and logical separations, need-to-know approvals and deletion once our processing of your personal data is no longer necessary.</p>

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**11. Changes to this Privacy Notice**

This UAE and DIFC Privacy Supplement supersedes all prior versions of any UAE or DIFC privacy notice relating to institutional clients and takes effect on 9 December 2025.

This Supplement forms part of the Citi Institutional Clients Privacy Notice framework.

Future updates to Citi's global privacy disclosures for institutional clients will be published at:  
<https://www.citigroup.com/global/privacy/institutional-clients>

Any updates specific to UAE or DIFC law will be reflected through updates to this Supplement.