

Global Privacy Notice for Institutional Clients

Consolidated version incorporating the Supplemental Provisions for the Federal Republic of Nigeria

Updated 5 March 2025

At Citi we value, respect and protect the privacy of our clients and service recipients.

This Privacy Notice describes how we collect and use (or ‘process’) personal information in connection with our **global markets, investment banking and financial services businesses for corporate entities, including governments and financial institutions**.

Depending on how you interact with us, other Citi Privacy Notices may also apply to you. For example: Our online privacy applies to visitors to Citigroup.com, while the Citibank Nigeria Limited customer privacy notice applies to retail banking clients. Additionally, we provide specific notices for non-client activities, such as Careers (for job applicants), and for our workforce (permanent and contingent).

This Privacy Notice does not replace privacy notices related to any other interactions with us, nor does it override Privacy Notices issued for specific purposes.

This printable version of the Global Privacy Notice has incorporated (in red font) the Supplemental Provisions for the Federal Republic of Nigeria, applicable to individuals who have rights under the Nigeria Data Protection Act 2023 (NDPA 2023) and/or the Nigeria Data Protection Regulation 2019 (NDPR), and any instruments and guidance issued under these and similar statutes.

This Privacy Notice covers the processing of personal information (also referred to as ‘personal data’) in the following business areas:

Markets

Citi global markets provide customized solutions that support the diverse investment and transaction strategies of corporations, governments, investors and intermediaries. The strength of our sales and trading, distribution capabilities span asset classes and currencies, sectors and products including Equities, Spread Products, Commodities, Rates and Currencies.
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Banking

Banking for institutional clients is organized around three lines of business: our Investment Bank, which meets clients' capital raising needs and provides merger and acquisition and equity and debt capital markets-related strategic financing solutions; our Corporate Bank, which serves as the conduit of Citi's full product suite to clients; and our Commercial Bank, which helps mid-sized companies address the challenges of rapid growth and international expansion. The unified Banking & International organization oversees the local delivery of the full firm to clients in each of the 84 markets where Citi has presence.

Services

Our suite of Services encompasses treasury, cash and trade banking services, and securities services. Within this offering Cash and Trade deliver an integrated suite of innovative and customized cash management and trade finance services to meet the needs of multinational corporations, financial institutions and public sector organizations. Similarly, our Securities Services arm provides cross-border support for clients with extensive on-the-ground local market expertise, innovative post-trade technologies, customized data solutions and a wide range of securities services that can be tailored to meet the requirements of our clients.

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 financial services that we provide to Your Organization, or other service recipients.

"Your Organization" is the corporation or institution you are associated with as an employee, authorized representative, director, shareholder or client.

"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 a business account.
- In certain US jurisdictions, information that identifies members of your household. However please note that we do not process Personal Information from other members of your **household, unless** where required by law or for legitimate business reasons related to purposes of reducing operational risk and the prevention of crime.

"Sensitive Personal Information" or **"Special Categories of Personal Information"** are interchangeable terms that refer to categories of Personal Information that require special handling due to their inclusion of certain elements such as racial and ethnic origin, religion, medical information, political or philosophical positions and biometric data. Personal information that has been aggregated and anonymised data is not considered Personal Information

for purposes of this Privacy Notice. In some US jurisdictions, sensitive personal information includes Social Security Numbers, Passports, Drivers Licenses or State IDs.

We will only process Sensitive Personal Information with your consent, unless applicable law contains exceptions or allows us to process it under a different legal basis (for example to comply with our legal obligations). In order to prevent its involuntary processing please do not share Sensitive PI or Special Categories of PI about yourself or anyone else unless we have been asked. If we receive that information directly from you or from a third party, by accident or happenstance, we may remove and dispose of it. We remind data subjects that we have an authorization, not an obligation to receive personal information (including its protected categories) from you or a third party.

Changes to this Privacy Notice

We may modify this Global Privacy Notice for Institutional Clients from time to time, to adapt it to changes in our products and services. Where changes are made, we will post a new version on this site. We will also inform our Institutional Clients as appropriate and in the manner set out in their terms and conditions.

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1. ENTITY RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION AND CONTACT DETAILS

Data Controller

The Data Controller in Nigeria is Citibank Nigeria Limited (CNL or 'Citi'). CNL is a commercial bank licensed by the Central Bank of Nigeria, with registered address at 27 Kofo Abayomi Street, Victoria Island, Lagos, Nigeria.

CNL's Data Protection Officer's E-mail address is: dponigeria@citi.com

CNL is responsible for the lawful collection, use, processing and disposal of personal data in Nigeria and its lawful transfer across international borders. CNL has ensured that it has appropriate contractual, technical and operational measures in place with its sub-processor and service providers to protect its and their processing of personal data.

You can request or enforce personal data rights by E-mailing or writing to CNL's Data Protection Officer to the contact details provided in this document.

Citi entities acting as Data Processors

In certain operations, Citi entities act as a **Data Processors, that is to say, as service providers or operators (and not as Data Controllers): for example, where processing international payments, when executing commercial payments and transactions** on behalf of banks and merchants and other institutions, for transfer agency and payment agency agreements, and in documents where we explicitly indicate that we are acting as service providers or data processors. You must refer to the Privacy Notice issued by the Data Controller of those operations.

If acting as a Data Processor we are also required to comply with a legal obligation, for example, if for processing a payment we need to conduct age verification, scrutinize beneficiaries names against international sanctions lists, or for fraud, money laundering or combating terrorism controls, or for process for compliance and transaction reporting, we will undertake those discrete activities as a Data Controller.

2. SOURCES OF PERSONAL INFORMATION

INDIRECTLY: From "Your Organization" and other entities

We obtain information from **third parties**, such as Your Organization, and financial institutions, governments, credit reference agencies, and anti-fraud data sharing bodies both domestic and international, and from service providers specialized in fraud detection and background checks.

We also obtain personal information from company or commercial registers, insolvency lists, and registers of persons that have been bankrupted or banned temporarily or permanently from holding directorships. Our contracted services also review estimated wealth, court listings, court judgments, and press articles (mainly on allegations of corruption and other red flags) on senior government figures and politically exposed persons, and our security and information services review international sanctions lists and anti-fraud cooperation mechanisms.

Finally, we may obtain personal information from international and domestic payment infrastructures, securities and currency markets, investment and settlement infrastructures (including clearing houses, securities depositories, stock exchanges, OTC or private exchanges).

DIRECTLY: From You

We obtain information **directly from You** from various sources:

- **Account activities:** bill payments, deposits, withdrawals, investments, and any other transactions in which you are an authorised corporate or operational signer.
- **Forms and Applications:** product variation or modification, lines of credit and credit limit increases, signatory names and signature sample forms, and electronic instructions).
- **Electronic and verbal communications with you, your banking representatives, or our corporate clients:** calls to our trading desks, client service desks, text and electronic messages and any other communications we receive from you, Your Organization, institutions you are employed by or other third parties, as required or permitted by law for the purposes of documenting instructions from you that resulted or may result in a financial transaction, and for authentication, security and quality assurance..
- **Citi Digital Platforms.** We process technical data and personally identifiable data related to transactions you perform in our Internet sites and mobile applications, in accordance with your contact preferences, cookie and profiling choices. Please refer to the Digital Platforms Supplement for more information.

3. CATEGORIES OF PERSONAL DATA

We collect the following types of personal data:

- **Identity data:** name, company, title, job description, and position in Your Organization.
- **Contact details:** such as email address, telephone number, business address and for KYC purpose, residential address.
- **Organizational Information:** Title and authorisations to represent Your Organization, and your current and prior relationships within Your Organization.
- **Communication and marketing information:** Your relationship with us, where you directly engage with Citi, including preferred methods of services communications, communications, and your marketing preferences.
- **Information relating to your personal assets:** part of our Know Your Client (KYC) legal and regulatory obligations, including background and credit checks, your holdings in the ownership structure of Your Organization, and any other corporate entity you are associated with.
- **Financial information and background checks:** as part of due diligence and identity verification checks, where you open and maintain accounts, products, and services on behalf of the corporate or institutional entity you represent, or where you have an individual payment account (including salary payment accounts).
- **Information required for legal or regulatory purposes** including AML and/or sanctions and investor screening processes (e.g., copies of your passport or a specimen of your signature) and for transaction management purposes.

Subject to legal obligations and any consents required, we may also collect sensitive

or protected information. If we do so, we will process such data in systems that compartmentalize it, with specific operational, technical and governance measures. Financial information is not considered a sensitive category of personal data but is afforded other forms of legal protection by bank secrecy and confidentiality provisions in banking law.

Further Protections for the processing of Sensitive Personal Data

Without prejudice to the principles set out in the NDPA 2023, Citi 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 Citi 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, since 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 since 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.

4. PURPOSES OF PROCESSING, CATEGORIES OF PERSONAL DATA AND LEGAL BASES

Purposes of Processing	Categories of Data	Legal Bases
<ul style="list-style-type: none"> - to provide banking and financial products and services to Your Organization, including the settlement of investments and payments to beneficiaries, receipt of payment instructions. - for processes covering the lifecycle of incoming and outgoing payments, refunds, rebates, payment origination, clearance and settlement, including wire transfers, internal and external funds management and transfers. -to record executed markets and currency trades by client-facing services. - For pre-contract steps prior to entering into a contract with us, including customer and third-party due diligence, and client referrals. - When you or Your Organization furnish instructions in relation to any contract or transaction, including to make a payment; 	Identity Data Contact Details Organizational Information Communication and Marketing Information	(a) Where the processing is necessary for us to perform a contract with you or for requested pre-contractual steps; (b) For international data transfers: consent.
-to provide payment products and individuals accounts for you (such as salary payment accounts) [OTHER PURPOSES FROM CONSUMER BANKING]	ELEMENTS FROM CONSUMER BANKING	CONTRACT NECESSITY CONSENT
<ul style="list-style-type: none"> - 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. -for transaction, trade and service monitoring, and maintaining sanctions lists -to conduct internal and external due diligence and Know Your Customer activities mandated by law. <p>We sometimes do more than the minimum necessary for compliance with those laws and regulations, but only as necessary to pursue our legitimate interests in cooperating with our regulators and other authorities, complying with foreign laws, preventing, or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets.</p> <ul style="list-style-type: none"> -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 of terrorism and white-collar crime, complying with country, regional and UN international sanctions, conducting checks on politically exposed persons: all of which involve screening a person's name and national ID against sanction and crime enforcement lists and registers. 	Information required for legal or regulatory purposes	(c) Where we are required by law
<ul style="list-style-type: none"> - to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes, such as referring clients to other counterparties that may be better suited to meet their needs. - to monitor and analyse the use of our products and services for system administration, operation, testing and support purposes. -to operate and manage our information technology and to ensure the security of our systems. - to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this. - to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes. - to monitor and analyse the use of our products and services for risk assessment and control 	Identity Data Contact Details Organizational Information Communication and Marketing Information Information relating to your personal assets Financial background checks	(d) Where necessary for our, or for a third party's legitimate interests , if your interests and fundamental rights do not override these interests. We will perform a balancing test of those interests prior to relying on this basis.

<p>purposes (including detection, prevention and investigation of fraud).</p> <p>- to record and/or monitor telephone conversations 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; and/or</p> <p>- to disclose information to governmental, tax or regulatory bodies, financial markets, brokers or other intermediaries, counterparties, court, auditors or other third parties, including third parties that assist us in complying with our regulatory or legal requirements or conduct compliance activities, when this is relevant to a transaction or activity regulated by foreign law</p>		
<p>In certain cases, the legal basis for processing is the performance of a task carried out in the public interest. This interest must be substantial and expressly recognised in legal statutes</p>	<p>Identity Data Contact Details Organizational Information Communication and Marketing Information Information relating to your personal assets Financial background checks</p>	<p>(d) Substantial Public Interest</p>

Artificial Intelligence, Automated Decision-Making and Profiling

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 tool for our personnel. We use fully automated means on securities markets (for example in algorithmic trading) solely where all information is de-personalised. If Your Organization is our client, depending on your digital marketing choices, we may create user profiles to offer you products targeted to Your Organization. Our marketing communications have links to change your preferences or suppress further notifications.

5. LEGAL BASES OF PROCESSING AND EXPORTING PERSONAL INFORMATION

CNL relies on various lawful bases as permissible by law, for the collection and processing of personal data, as further detailed in the table below.

CNL will rely on consents, gathered indirectly through corporate clients, for international transfers of personal information. This includes personal data from account managers, signatories, officers and directors, and their service recipients, where appropriate. These consents are collected through our account operations or in a transactional basis, for example, each time we receive the client's instructions to pay a beneficiary.

In certain cases, CNL collects consents directly:

(1) From persons related to corporate clients who have access to Citibank's digital platforms, for example CitiDirect and CitiVelocity, gathered during user onboarding,

and further requested (or ‘refreshed’) where changes to the digital platforms merit a fresh consent, and.

(2) From persons that receive banking services from CNL, such as limited payment accounts and payment beneficiaries (including staff salaries)

Where available we rely in other lawful basis for processing including for compliance with applicable law or in the public interest recognized in a statute, or where it is necessary for the establishment, exercise or defense of legal claims.

Silence

Your silence will never be assumed to be consent to the processing of your Personal Information.

Legitimate Interests- Request to Cease Processing

Citi shall discontinue the processing of your Personal Information on your request, unless Citi demonstrates a public interest or other legitimate grounds which override your fundamental rights and freedoms and interests.

6. CONSEQUENCES OF NOT PROVIDING, OR WITHDRAWING, YOUR CONSENT FOR THE PROCESSING OF PERSONAL INFORMATION

You may withdraw or revoke your consent for processing at any time, but if you do so, we will be unable to continue providing financial services to you or your organization through you. The legality of personal data that we collected and processed prior to your withdrawal or revocation will not be affected, and we will continue to store your personal data for a reasonable time period, in compliance with our retention requirements as a financial institution, and your personal data will not be used other than for compliance with CNL’s legal **obligations**

7. YOUR PRIVACY OR DATA PROTECTION RIGHTS

You have rights over your personal information that are protected by law in many countries. Most countries grant 4 basic rights: Access, Rectification, Cancellation and Objection (by their initials, the so-called **ARCO** rights). Citi extends these, and other rights set out in the EU General Data Protection (GDPR), beyond the requirements under local law, in order to provide a consistent standard across our operations globally.

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

- Right to be informed
 - You have the to be informed of sub-processors (sub-contractors) that receive your data and a summary of processing purposes and of how we use operational and technical measures to protect your data.
- Right to access your information:
 - You can [contact us](#) to request a copy of the personal information we hold about you. This is often known as a ‘subject access

request’.

- Right to rectify your information
 - You can [contact us](#) to ask us to correct personal information that you believe we hold which may be inaccurate or incomplete.
- Right to erase your information (or “right to be forgotten”)
 - You can [contact us](#) to ask us to erase personal information that we hold about you, which we will carry out unless we are required to retain the, for a specific duration, in order to prevent fraud and other forms of crime, or for our defence in claims.
 - There may be some instances where we are not able to erase your personal information if we are under a legal requirement to store product applications or information in relation to banking or securities transactions. If this is the case, we will clearly explain in our reply to your request the reason we are unable to cease processing (and storing) your personal information.
- Right to transfer your information to another organisation
 - You can [contact us](#) to ask us to transfer your personal information to other organisations. This is often known as the ‘right to data portability’.
 - There may be some instances where we are not able to transfer your information, if we are relying on a lawful basis other than ‘consent’ or ‘contract’ to process your personal information.
- Right to restrict processing of your personal information
 - You can [contact us](#) to ask us to restrict processing of your personal information.
 - There may be some instances where we are not able to restrict processing of your personal information if you do not provide us with a particular reason for wanting the restriction.
- Right to object to processing.
 - You can [contact us](#) to object to us processing your information.
 - We may not always be able to accept your objection, if we need to continue to process your information for our business, legal and regulatory and other purposes.
- 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 information, you can [contact us](#) to object to us processing your information on these grounds.
 - We will always consider your reasons for objecting to us processing personal information on these grounds, and balance

your interests, rights, and freedoms with our legitimate business interests.

- 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 may not always be able to provide all requested information or fulfil other rights where certain exceptions apply to a privacy rights 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 always respond to your request within the timeframes provided under applicable law.

To ensure your safety and given the confidentiality of financial information, we must verify your identity before disclosing any personal data. If you are making a request on behalf of someone else (as an attorney or a friend or relative) we may require further information to ensure that you are duly authorised to make that request.

8. DISCLOSURES AND RECIPIENTS OF PERSONAL INFORMATION

For the purposes providing banking and financial services, we 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, if you request or use their services including online portals and Apps.
- To Citi's service providers who assist business functions such as application processing, fraud and money laundering monitoring, and the provision of client service centres and web hosting, and data analysis.
- To stock and security trading houses and exchanges, alternative trading systems, settlement agencies, facilities and similar entities, including

clearing houses, payment infrastructure providers, counterparty banks, and any persons from whom we receive or make payments instructed or received by you.

- To securities brokers, custodians, sub-custodians, fund administrators, fund houses, depositaries, trustees, financial market infrastructure service providers (including settlement and securities payment providers), and
- 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.

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

Where required by applicable law, we shall add to Country or Territory Supplemental Provisions, and to our client terms, details of third parties we share information with, their locations, and the categories of information that we share.

9. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We limit international transfers of personal data from CNL to the operations that are required to perform banking and financial services: for example, where we need to send account details of the payer or beneficiary to a foreign corresponding bank.

We ensure your personal information is transferred to countries that have an equivalent or ‘adequate’ level of data protection. Where we transfer personal information to other countries, we will do so in limited circumstances, such as under client instructions, where the transfer is necessary to perform a cross-border operation or transaction, and for security and anti-fraud purposes. We use safeguards to appropriately address the risks in international data transfers.

We also transfer de-personalised and aggregated (or otherwise anonymized) data, such as it ceases to be personal data, to our parent company and other subsidiaries, for internal management purposes.

10. RETENTION OF PERSONAL INFORMATION

Citi data controllers shall erase your Personal Information without undue delay where such Personal Information is no longer needed in relation to the purposes for which it was requested, and in the absence of another lawful basis to retain it.

11. SECURITY

Citi stakes reasonable steps to preserve the security of personal information.

All personal information is held in a protected environment with sufficient organizational and technology measures appropriate to a professional financial organization. We have implemented security controls, procedures and

protocols across our different business lines, physical premises, and IT networks to minimize loss, misuse, unauthorized access, modification, or disclosure of personal information. All information shared with external third parties is encrypted during transmission and in storage, and all information held internally is protected using security passwords and logons or other security procedures. However, due to the inherent nature of electronic communications, we cannot guarantee the security of personal information outside our networks

Notification of Security Incidents and Breaches of Personal Information

The safety, security and integrity of your personal information are paramount to banking operations. We will promptly notify the Nigeria Data Protection Commissioner and in any case within 72 upon becoming aware of any accidental or intentional damage, alteration, destruction, unauthorized disclosure, loss, misuse, inability to access, extraction or theft of personal information that is stored or processed by Citi, where there is a risk to your rights or freedoms. If the risks are significant, we will also communicate directly with you, providing details of the data exposed to risk, with advice and measures we take to mitigate any adverse effects.

12. MINORS (CHILDREN)

Our corporate products and financial services are designed for businesses, corporate, government and institutional clients of a commercial bank, and are not designed for persons under the legal age that are generally unable to represent corporate entities or enter into business transactions in their own name

We do not knowingly collect personally identifiable information from anyone under the age of 18 except where the age of the individual cannot be determined (for instance, where a person is the beneficiary of a payment). If you are a parent or guardian, please read this Privacy Notice and any applicable Supplements to thoroughly understand how personal information is handled, and contact us if you have any concerns. If we become aware of personal information collected without parental consent, we will take steps to obtain such consent or remove it from our records.

13. SUPPLEMENTAL PROVISIONS

Digital Platforms

Please click [here](#) to access our Digital Platforms schedule, for Citi's international corporate online banking, card management and trading portals.

Citi Research

Citi Research, for international trends and global markets, covered [here](#)

14. CONTACT INFORMATION FOR CONCERNS OR COMPLAINTS

Right to File Claims before the Nigeria Data Protection Commission

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 No.12 Clement Isong Street, Asokoro, Abuja or info@ndpc.gov.ng.

You may communicate with Citi through the following means:

Through Citi's Data Protection Officer at Citibank Nigeria Limited, 27, Kofo Abayomi Street, Victoria Island, Lagos, Nigeria or dponigeria@citi.com or,

Through your relationship manager or customer services at
<https://www.citigroup.com/global/privacy/contact-us>