

## Global Privacy Notice for Institutional Clients

### Digital Platforms Supplement: Online Portals and Mobile Apps

CitiVelocity, CitiFX, CitiDirect, CitiManager and Citi Business Manager

Effective Date: 1 January 2023 (Updated 31 January 2024).

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These Supplemental Provisions describe how Citi<sup>1</sup> entities collect, use, share and dispose of information you share with us when you use our **Digital Platforms** or **Digital Content** for **Institutional Clients** (terms explained further below).

**Digital Platforms** mean the digital institutional client ecosystem encompassed by corporate online banking, commercial card online services, digital interfaces for securities, currencies and commodities trading and information. These are commercialized under the brand names CitiVelocity® CitiFX® FXPlus® CitiDirect® CitiManager® and Citi Business Manager®. Furthermore, these Supplemental Provisions also apply to any additional institutional client portals, web pages and applications associated by their Terms of Use to the Global Privacy Notice.

**Digital Content** means all reports, content or data that we make available electronically to institutional clients in our **Digital Platforms**.

**Institutional Clients** are the corporate entities and government, institutions that are clients of Citi financial institutions, and their service recipients.

These Supplemental Provisions complement the Global Privacy Notice for Institutional Clients in relation to Digital Platforms and Digital Content. Any terms that appear capitalized have the meaning given to them in the Global Privacy Notice. In case of conflict, these provisions shall take preference in their interpretation.

**At Citi we value the trust and confidence you and Your Organization place in us, and earning your trust in how we collect, use, hold and share information about you is our priority.**

As you review this **Digital Platforms Supplement** here are a few important things to keep in mind:

- Our services, web sites, pages within those websites, our materials or portals have additional terms of service (terms of use) that limit our use of confidential business and personal information we obtain from **Your Organization**. As a user of Digital Platforms or Digital Content, we kindly ask that you review those terms of use.
- Unless specifically requested, please refrain from sharing **Sensitive Personal Information** (Special Categories of Personal Information), whether pertaining to yourself or others. If such information is detected,

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<sup>1</sup> Citi means the Data Controllers of our Digital Platforms listed at the end of this Digital Platforms Supplement, also referred to collectively as 'We'

we will promptly and securely dispose of it, or hash it in a way that cannot be reconstructed.

- As an individual (or ‘data subject’), even in the context of an Institutional Client relationship, you retain control over your personal information, and can make choices about how your personal information may be used and shared. As you consider this, we hope you will make choices that will enable us to provide **Your Organization** with quality products and services that meet its financial needs and objectives.

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### **A. PERSONAL INFORMATION WE COLLECT**

We collect two types of information “Personal Information” and “technical information”

“Personal Information” is any information:

- 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
- that can be used to authenticate you or provide access to an account.

“Technical Information” is information that does not and cannot reveal an individual's specific identity, such as information that has been de-identified or aggregated.

### **B. SOURCES OF PERSONAL INFORMATION**

For the past 12 months, we have collected information from the following sources.
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**[continues on the table in the next page]**

Sources	Information Collected
Through the Digital Platform	<p><b>Depending upon the digital services you request, subject also to limitations in their Terms of Use and your device settings:</b></p> <p>What we Collect: Personal Information such as account type and status (active, inactive), access credential details, such as user ID, password, and personal security questions; your position, and role within Your Organization; your employment or employment history; biometric information (for authentication in the platform, if collected); and a record of acceptance to the Terms of Use and rights of access to any Digital Platform. Where we collect additional information for specific purposes through the platform, we will disclose so at the time of collection.</p> <p>We may collect certain network activity information from your personal or corporate device, such as usage and traffic data only in relation to your access and use of our Digital Platforms, including which web pages and Digital Content you visited, downloaded and web page functions you used; We may also collect aggregated information about your visits. While such information may not directly reveal your individual identity, we may be able to associate your usage with technical information, or and other information we have collected about you.</p> <p>We may also monitor and record telephone, email, instant messaging, or other communications that interface with a Digital Platform.</p> <p>Our legitimate business purposes for collecting this information are: Providing and administering Digital Platforms to end users of Institutional Clients; to facilitate and manage the intake of new users; to provide institutional client or customer services; to improve our Digital Platforms and your experience on them; to conduct internal research and business analytics, identify usage trends; to conduct fraud monitoring and loss prevention; for information security; and to comply with foreign laws and regulations to which our global operations are subject (in addition to the laws and regulations applicable to the country where you reside); to protect our clients and our own institutions against illegal activity; to uphold our clients and our own legal rights; for performing audits; to verify access requests for Your Rights; for tailoring and sending marketing communications; for managing our business effectively; and for developing new products and services.</p>

<p>Through your browser or device</p>	<p>What we collect: Certain information is collected from you automatically through your Internet browser(s) or device(s), to enable secure communications such as your IP address; Media Access Control (MAC) or International Mobile Equipment Identity (IMEI); computer type (Windows or Mac) or device manufacturer and model; optimal screen resolution; operating system name and version; language; Internet browser type, version, and settings; installed fonts; and time zone.</p> <p>We may use attributes associated with your device (such as those described above) in order to create a device fingerprint or identifier so that we can recognize your device, along with the time of your visit and any pages visited.</p> <p>Our business purpose for collecting this information: Providing and administering Digital Platform(s); managing the intake of new users; providing end user services (resolving technical issues); improving our Digital Platforms and your experience on them; performing research and business analytics and identifying usage trends; engaging in fraud monitoring and prevention; information security; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our own and our customers' legal rights; performing audits; verifying requests made pursuant to Your Rights; and subject to your consent: performing sending marketing communications; managing our business effectively; and developing new products and services.</p>
<p>Using unique identifiers such as cookies, pixel tags, device profiling and similar.</p>	<p>What we collect: Subject to your consent, we may use cookies and similar tracking technologies, such as pixel tags and web beacons, to collect device information upon login; browser and browsing information such as time spent on our Digital Platform(s), pages visited, language preferences, and other traffic data. These cookies may contain or reflect segment or other interest-based data in a de-identified form including interests across other sites.</p> <p>Our business purpose for collecting this information: Providing and administering Digital Platforms; intake of new customers and new users; providing customer services; improving our Digital Platforms and your experience on them; performing research and business analytics, and identifying usage trends; engaging in fraud monitoring and prevention; information security; compliance with applicable laws and regulations; protecting our business and our customers against illegal activity; protecting our and our customer's legal rights; understanding your interests and preferences; tailoring and sending marketing communications; managing our business effectively; and developing new products and services.</p>

Drawing inferences from personal information	<p>What we develop: We may draw inferences from the Personal Information about you and from information about your firm that we have collected, and create new data about you.</p> <p>Our business purpose for drawing these inferences: To provide a digitally enhanced customer service and support; to develop and improve our products and services; to provide research and business analytics; and to tailor marketing and communications from us and our affiliates to Your Organization.</p>
From third parties	<p>What we collect: We may collect information about you from third-party sources, including, for example, your firm or employer, financial institutions, government sources, and other individuals. This information may include name and contact information, credit and background reports, and information from government records.</p> <p>Our business purpose for collecting this information: Securing and administering our Digital Platforms; facilitate the intake of new users; prevent and monitor fraud; for compliance with applicable laws and regulations; to protect our business and our customers against illegal activity; to protect our customers' legal rights.</p>

## B. CALIFORNIA NOTICE

### Summary of 12-Month Personal Information Handling Practices for Digital Platforms

Citi provides in the chart below a summary of our prior 12-month Personal Information handling practices in our Digital Platforms. We do not have actual knowledge of any collection, use, sale, or sharing of Personal Information of consumers under 16 years of age.

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
Identifiers, such as real name, email address, postal address, or other similar identifiers	<p>You (through your use of a Digital Platform)</p> <p>Your Organization (the institutional or corporate client you are affiliated with)</p>	<p><b><u>Sold</u></b> We have not sold your identifiers to third parties.</p> <p><b><u>Shared</u></b> We have not shared your identifiers with third parties for marketing or targeted advertising purposes.</p> <p><b><u>Service Providers</u></b> We have disclosed your identifiers to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
<p>Any Personal Information described in Cal. Civ. Code § 1798.80(e), such as name, address, telephone number, or financial information.</p> <p>Depending upon the services you request, we may collect additional Personal Information such as: account type and status access credentials, such as a user ID, password, and security questions</p>	<p>You (through your use of a Digital Platform)</p> <p>Your Organization (the institutional or corporate client you are affiliated with)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Characteristics of protected classifications under California or federal law, such as age, gender, or marital status</p>	<p>You (through your use of a Digital Platform)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Commercial information, such as records of products or services purchased, obtained, or considered, and a record of your acceptance of the Digital Platform’s Terms of Use (for example CitiVelocity <a href="#">terms</a>).</p>	<p>You (through your use of a Digital Platform)</p>	<p><b>Sold</b> We have not sold such Personal Information to third parties.</p> <p><b>Shared</b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Internet or other electronic network activity</p>	<p>You (including through your use</p>	<p><b>Sold</b></p>

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
<p>information, such as browsing history, such as usage and traffic data relating to your access to and use of a Digital Platform, including pages visited and functions used; information collected through cookies, web beacons and similar technologies (subject to your consent and privacy settings); and aggregated information about your visits to and use of a Digital Platform. While this information may not directly reveal your identity, we may associate this usage and Other Information we collect with Personal Information about you.</p> <p>We may also monitor and record your telephone, email, instant messaging, voice and other communications with or in connection with your activities in our Digital Platforms</p>	<p>of a Digital Platform)</p>	<p>We have not sold such Personal Information to third parties.</p> <p><b><u>Shared</u></b> We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b><u>Service Providers</u></b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Sensitive Personal Information, such as consumers’ biometric information (for authentication and information security, if collected*)</p>	<p>You (through your use of a Digital Platform)</p>	<p><b><u>Sold</u></b> We have not sold such Personal Information to third parties.</p> <p><b><u>Shared</u></b> We have not shared such Personal Information with third parties for marketing targeted advertising purposes.</p> <p><b><u>Service Providers</u></b> We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
<p>Professional or employment-related information, including the name of your firm, your department and role at</p>	<p>You (through your use of a Digital Platform)</p>	<p><b><u>Sold</u></b> We have not sold such Personal Information to third parties.</p> <p><b><u>Shared</u></b></p>

Category of Personal Information	Sources	Business or commercial purpose* of processing and recipients of Personal Information
Your Organization; and information about your employment or employment history;	Your Organization (the institutional or corporate client you are affiliated with)	<p>We have not shared such Personal Information with third parties for marketing or targeted advertising purposes.</p> <p><b>Service Providers</b>  We have disclosed such Personal Information to our affiliates and to other parties that provide services to us or act on our behalf in connection with the operation of our business. See the “Disclosure of Personal Information” section in the Privacy Notice for more details.</p>
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 CFR Part 99)	You (through your use of a Digital Platform)	We have not sold, shared or used such Personal Information.

**CPRA ADDITIONAL DISCLOSURE OF PERSONAL INFORMATION**

As relevant to the services Your Organization has requested on your behalf, we may share your Personal Information with entities and in other geographies, for the purposes and in the circumstances indicated below:

- In order to provide global services to Your Organization, to Your Organization and its Affiliates (as permissible under applicable law) and with Citi affiliates that receive or have access to your Personal Information if you access, request, or otherwise use other Citi services in order to use our Digital Services anywhere in the world. Please note that applicable law in certain countries, requires us to request your consent to share personal data with affiliates of Your Organization, outside of the country where you are engaged as an employee or in other capacity. You may, therefore, need to grant consent to Your Organization, and may be asked to renew your consent from time to time.
- In order to enable our Digital Services to work globally, including display and provisioning to secure and fast access to web site portals and pages: with third party providers of data hosting, communications, data analysis, advanced data analytics, information technology and services infrastructure.
- For problem or issue resolution and customer services, and to assist in management and business functions, with other Citi affiliates or third-party suppliers.
- For compliance with legal, regulatory rules of an exchange, trading facilities or OTC services, with regulatory agencies, alternative trading systems, clearing and settlement houses, counterpart banks, broker-dealers, funds and similar entities or organizations.



- In order to facilitate any Citi organizational change, including prospective actual merger, sale, joint venture, assignment, transfer, or disposition of all or a portion of our businesses or assets, or in connection with bankruptcy or similar proceedings, with banking and broker-dealer regulators and relevant acquiring parties.
- In order to manage disputes or issues with access to Citi Digital Content and to help that corporate entity value and pay for the Citi Digital Content, with Your Organization.
- In order to manage business and resources and to improve our Citi Digital Content and its applicability to you, with the other data controllers of Citi Digital Platforms named in this Supplement.
- To prevent fraud, terrorist financing, money laundering, and other forms of financial crime, to banks, stock exchanges, alternative trading systems, clearing and settlement agencies, and other financial institutions, or self-regulating crime information services.
- To enable your access to third party information in our Digital Content, to our approved third-party suppliers and distributors.
- To our legal advisors, government and law enforcement authorities and other persons involved in or reasonably contemplating legal proceedings.
- To competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction.
- To other persons where disclosure is required by law or to enable Citi Digital Content to be provided to you or our clients.

We have not and will not disclose or share your Personal Information with third parties for advertising or direct-marketing purposes.

#### D. LEGAL BASIS AND PURPOSES OF PROCESSING – GDPR NOTICE

\*We process your personal information for the following reasons:

Legal Base	Purposes
(a) Where the processing is necessary for us to perform a contract with you or for requested pre-contract steps (GDPR Art 6.1.b)	<ul style="list-style-type: none"> <li>- Providing and administering our Digital Platforms, including the intake of new users, in accordance with the <b>Terms of Service</b>.</li> <li>- Provide Digital Content and Digital Platform updates, customer services, technical notices, security alerts, and for systems support and administration (including notifying you of changes to or terms and conditions, and policies) and respond to your comments, questions and customer service requests, in accordance with any <b>Terms of Service</b>.</li> </ul>

<p>(b) Where we are required EU or EEA Member State law, UK or Swiss law or the law of any applicable jurisdiction (GDPR Art 6.1.c)</p>	<ul style="list-style-type: none"> <li>- For compliance with applicable laws in the EEA (including EU), or UK, Switzerland, the Bailiwick of Jersey and any country in the region that has equivalent or similar legislation, by the data controller or its sub-processors, without notice to you, or as required for your relevant Digital Platform services to be provided.</li>   <li>- As an example of this legislation we can mention (without limitation) anti-money laundering and anti-terrorist laws and regulations. In the United Kingdom these are the Proceeds of Crime Act 2002, the Terrorism Act 2000, the Terrorism Act 2006 and Money Laundering Regulations 2007.</li>   <li>- to cooperate with, respond to requests from, and report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, trading venues or other intermediaries and our counterparties, courts or law enforcement.</li>   <li>We sometimes do more than the minimum necessary for compliance with those laws and regulations, but only as we deem justified by our legitimate interests in cooperating with our regulators and other authorities, and complying with foreign law, for preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets.</li>   <li>- to conduct internal compliance activities such as audit and reporting, assessing, and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime, for know your customer (KYC) (including identity checks and verifying address and contact details), and processing data from government officers and politically exposed persons (screening client records against internal and external databases as part of client due diligence and on-boarding) and for sanctions screening (which involves the screening of clients and their representatives against published sanctions lists);</li> </ul>
<p>c) Where necessary for our or a third party's legitimate interests (as listed here) and where your interests and fundamental rights do not override these interests. We will perform a balancing test of the interests prior to relying on legitimate interest to process personal data. (GDPR Art 6.1.f)</p>	<ul style="list-style-type: none"> <li>- improving our digital platforms and your experience on them.</li>   <li>- performing research and business analytics, identifying usage trends to monitor and improve our own business, and to generate reports or other content based on research and analysis, utilizing Other Information that does not identify individuals.</li>   <li>- performing fraud monitoring and prevention.</li>   <li>- for information security.</li>   <li>- to protect Your Organization and our business against any illegal activity.</li> </ul>

	<ul style="list-style-type: none"> <li>- to protecting Your Organization and our own legal and regulatory rights.</li> <li>- for performing audits.</li> <li>- to verify requests made pursuant to this Digital Platforms Supplement.</li> <li>- for crafting and issuing marketing communications, and inviting you to events offered by Citi and other financial institutions, accountants, consultancy firms, lawyers and industry associations or research groups,</li> <li>- to provide news and information that is relevant to the products and services contracted by Your Organization: but note that you can change your privacy settings and object to these communications at any time.</li> <li>- to manage and develop our business effectively, design new products and services, and manage our relationship with Your Organization with us.</li> <li>- for meeting obligations with entities out of jurisdiction, including overseas stock exchanges, alternative trading systems, clearing and settlement agencies, government agencies and regulatory authorities, brokers, and other similar entities, and for complying for foreign law.</li> <li>- for assigning, sub-contracting, outsourcing, or procuring goods or services for any part of the normal business functions through third parties.</li> <li>•for the security of our Digital Platform and Digital Content services</li> <li>• for communicating with credit reference and information agencies</li> <li>- to monitor and analyze the use of our digital products and services for system and application management, operation, testing and support purposes.</li> <li>- 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.</li> <li>- 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.</li> <li>- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud).</li> <li>- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints,</li> </ul>
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	<p>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 applicable law other than EU/EEA, Swiss, UK or Crown Dependency law and such disclosure in in our (or a third party’s) legitimate interest.</p>
d) Consent (GDPR Art 6.1.a)	<p>In most cases, we do not rely on consent as the legal basis for processing your personal data. If we do rely on your consent, we will make this clear to you at the time we collect your data and ask for your consent. We rely on your consent to deploy and manage Cookies and other tracking technologies on devices from which you access our Digital Platforms.</p> <p>You may withdraw or revoke your consent and change your cookie and tracker preferences at any time, but if you do so, we may be unable to provide (or continue providing) relevant products, or services that are subject to such consent to, or to otherwise do business with, you or Your Organization.</p>
f) Substantial Public Interest (GDPR Art 6.1.e)	<p>In exceptional cases, our legal basis is that processing is necessary for the performance of a task carried out in a substantial public interest. This interest must be expressly recognized in statutory law (in Schedule 2 to the UK Data Protection Act 2018: Prevention and detection of crime or the protection of vulnerable persons).</p>

## E. JURISDICTION - SPECIFIC INFORMATION

### A. CALIFORNIA PRIVACY RIGHTS

If you are or will become a California resident, please refer to the IC Global Privacy Notice's California Supplement.

### B. EUROPEAN PRIVACY RIGHTS: EEA /EU, Switzerland, Jersey and United Kingdom

If you are located in the European Economic Area (including the European Union) or the United Kingdom, Switzerland, Jersey or another jurisdiction with similar or equivalent data protection laws please refer to the EEA (and UK) Supplemental Provisions in our global Privacy Notice

### C. SINGAPORE, HONG KONG, INDIA, MEXICO, BRAZIL, COLOMBIA, UNITED ARAB EMIRATES AND SOUTH KOREA.

To exercise your privacy and other rights in other jurisdictions, users of Digital Platforms and Digital Content should contact us using the forms and information found on the following sites:

**Singapore:**

[https://www.citibank.com.sg/global\\_docs/pdf/FINAL\\_CSL\\_PDPA\\_Circular\\_Corporates.pdf](https://www.citibank.com.sg/global_docs/pdf/FINAL_CSL_PDPA_Circular_Corporates.pdf)

**Hong Kong:** [https://www.citibank.com.hk/english/info/pdf/PDPO\\_EN.pdf](https://www.citibank.com.hk/english/info/pdf/PDPO_EN.pdf)

**India:** <https://www.online.citibank.co.in/privacy/privacy.htm>

**México:** [https://www.banamex.com/es/privacidad\\_portal.htm](https://www.banamex.com/es/privacidad_portal.htm)

**Brazil:** [https://corporateportal.brazil.citibank.com/resources-responsive/pdf/institucional/politica\\_privacidade.pdf](https://corporateportal.brazil.citibank.com/resources-responsive/pdf/institucional/politica_privacidade.pdf)

**Colombia:** [https://www.citibank.com/icg/sa/latam/colombia/institucional-info/assets/docs/Aviso\\_de\\_Privacidad\\_Citibank\\_2019.pdf](https://www.citibank.com/icg/sa/latam/colombia/institucional-info/assets/docs/Aviso_de_Privacidad_Citibank_2019.pdf)

**United Arab Emirates:** Your use of the Digital Platforms and access to Digital Content signifies that you agree to waive your material privacy rights under the laws of the UAE. Your use of the Services indicates your consent to disclose any information that you may consider a secret to anybody at any time. You agree not to hold Citi liable for any disclosure of such information that you may think to be a secret to anyone. Please do not use Digital Services if you disagree with any part of this Supplement.

**South Korea:** Your consent of the Privacy Notice, this Supplement and the User Agreement indicates your agreement that your personal information will be controlled, not by Citibank Korea Inc. nor other subsidiaries and affiliates in Korea ("Citi Korea"), but by Citigroup Inc. New York, United States of America or its affiliated entity which operates the Services you are accessing. Citi Korea is solely responsible for the use of your personal information within Korea, when it is used by Citi Korea, under the applicable Korean laws including, the Personal Information Protection Act, the Act on Promotion of Information and Communications Network

Utilization and Information Protection, and other relevant Korean laws. Your personal information and any Submitted materials can be shared with Citi Korea, but Citi Korea will not collect and use such personal information and material for any marketing purpose without your prior consent. When Citi Korea obtains personal information our personal information via the Digital Services, its use will be controlled by and be bound to the necessary process and procedure following the applicable Korean laws.

## F. ADDITIONAL INFORMATION

### MOBILE PUSH NOTIFICATIONS

With your consent, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

### LOCATION INFORMATION

When you first launch our mobile application, you will be given the option to consent to the app's collection of precise location information. If you initially consent to our collection of such location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. You may also stop our collection of this location information by following the standard uninstall process to remove all of our mobile apps from your device. If you stop our collection of this location information, some features of our Services may no longer function properly.

### COOKIES AND SIMILAR TECHNOLOGIES IN OUR DIGITAL PLATFORMS

Please refer to the Institutional Clients Group Websites [Cookie Policy](#) for information about cookies and other tracking devices.

**Analytics cookies may include Adobe Omniture and Adobe Analytics.**

**We also use products from Google Analytics and Google Marketing Platform Analytics.**

**Adobe and Google are US electronic communications service providers that are subject to the CLOUD Act (USC 2523) and Foreign Intelligence Surveillance Act (50 USC 36 S. 1801). These two statutes contain provisions that allow federal law enforcement and intelligence agencies to request non-US browsing and technical data, under certain conditions.**

You can choose whether to accept or not cookies **or trackers** through your browser settings. For example, most browsers allow you to automatically decline cookies or decline or accept a particular cookie (or cookies) from a particular site when browsing. If you decide not to accept cookies, certain features of our Digital Platforms may not work properly because we may not be able to recognize your device and associate you with your Citi account(s). In addition, the content we provide may not be as relevant to you or tailored to your interests.

Local shared objects may be stored on your device when using a media player or other software integrated into our Digital Platforms. Local shared objects are similar to cookies in terms of their operation, but they are not managed in your browser in the same way. Restricting acceptance of local shared objects may impede the functionality

of some features, including how certain content is presented. Similarly, certain authentication features of our apps may set a persistent token, similar to a cookie, on your mobile device. This token allows that device to be uniquely associated or bound with your account. This token will remain on your device until you un-enroll from those features or delete the app from your device.

## **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.

## **G. SECURITY OF PERSONAL INFORMATION**

The security of financial and personal information is at the heart of our business. We protect this information by maintaining physical, operational and technical safeguards that meet and exceed our legal requirements. 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.

## **THIRD-PARTY SITES AND SERVICES**

This Notice does not address, and we are not responsible for, the privacy, security, or other practices of any third parties, including any third party operating any site or service linked to from our Digital Platforms. The inclusion of a link to any third-party site or service does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, wireless service providers, Internet service providers, device manufacturers and/or social media platforms may have their own privacy notices that are different from this one for the information they may access through your use of Digital Platforms. We encourage you to read their privacy notices as the collection, uses and sharing of information by those third parties may be different from Citi's practices.

We are not responsible for the information collection, usage, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other third-party app provider, social media platform provider, operating system provider, device manufacturer, or wireless service provider, including with respect to any Personal Information you disclose to other organizations through or in connection with our Digital Platforms.

## **H. JURISDICTIONAL ISSUES - EXPORTING RESTRICTIONS**

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