

Supplemental Provision – Japan

This Supplemental Provision – Japan (this “**Supplement**”) supplements the information contained in the Privacy Notice and applies solely to clients of Citi ICG which are located in Japan or receive services in Japan. The names of the global ICG entities that are under the supervision of the Financial Services Agency and who are responsible for information management in Japan are

Bank: Citibank N.A., Tokyo Branch

Address and its representative: <https://www.citigroup.jp/jp/about/cbna-tokyo/index.html>

Citigroup Global Markets Japan Inc.

Telephone O&T Planning : 03 (6776) 8800 (Main)

Office Hours: From 9:00 a.m. through 5:00 p.m. (Monday through Friday)

Closed on Saturday, Sunday, National Holidays and Year-end and Year start.

We declare that we will take reasonable security measures to protect Personal Information, continuously improve our policy on security measures, and comply with all of the Japanese personal data protection laws and regulations.

Declaration of Measures and Handling of Personal Information by global Citi entities in Japan

1. We will comply with all applicable laws, regulations and guidelines in relation to clients’ personal information, and safeguard, according to strict standards of security and confidentiality, any information our clients and their related persons share with us.
2. We will collect clients’ personal information in a lawful and fair manner. The main methods of collection are collection through applications to open accounts, applications for various services and other documents. If we collect personal information indirectly, we will ensure that the provider of the information has taken the legal steps (such as acquisition of the principal's consent or opt-out) required for the provision to a third party. Opt-out is a situation where the purpose of use of the person's personal information includes disclosure to third parties and such disclosure will be terminated upon such person's request.
3. Unless the data subject’s consent is obtained or other exceptions apply, we will limit the use of client personal information to the minimum we require for implementing the purpose of use preliminarily disclosed. If we change such purpose of use, we will promptly announce or notify the client and data subject of such change. We will specifically define the purpose of use so that it will be clear to clients’ and data subjects and try to limit the purpose of use according to each situation where personal information is obtained. For example, we will limit the use of the responses to various questionnaires to the collection of questionnaires.
4. We will permit only authorized employees, who are trained in the proper handling of personal information, to have access to that information.
5. We shall not use customers' personal information in any manner that is likely to encourage or induce any illegal or improper acts.

6. We will not provide our clients' personal information to outside parties unless one of the following applies:

- ☐ the data subject agrees to such provision
- ☐ such provision is required by applicable laws and regulations
- ☐ such provision is required for the protection of human life, physical health or property
- ☐ support services are outsourced to other organizations
- ☐ we co-use with the co-users as mentioned below
- ☐ any other special reason applies

7. Whenever we hire other organizations to provide support services, we will choose them conforming to our internal rules regarding safeguarding of personal information and supervise them as necessary and appropriate, including auditing them for compliance with our internal rules. Such organizations include, without limitation, our group companies overseas and domestic and other service providers overseas and domestic. We use service providers to handle personal information in the following cases, for example:

- Administration regarding sending transaction statements;
- Administration regarding sending direct mail;
- Business regarding operations and maintenance of systems.

8. For purposes of credit reporting, verification and risk management, we will receive personal information from third-parties including co-users such as clearing houses, etc..

9. If any person acting on behalf of corporate or institutional client so requests, we will cease to use the their personal information for purposes of direct marketing (sending direct mail, telemarketing, etc.).

10. We will establish measures as necessary to prevent leakage, loss or destruction of, or safeguarding of, personal information and implement such measures strictly. We will also establish a system and manual to deal with emergency situations.

11. Security management measures implemented by us include "organized security management measures," "human security management measures," "physical security management measures," "technical security management measures," and "understanding external environment," according to the respective stages of acquisition, use, and safekeeping, etc. of personal data.

12. We will sincerely receive, strictly investigate, and appropriately and promptly deal with customers' complaints.

13. We will review our efforts for the protection of personal information for improvement on a continuous basis.

Co-Use of Personal Data with other ICG global institutions for delivery of global products and services to institutional clients, transaction parties, etc.

Citi entities in Japan co-use personal information with the group companies and affiliated joint ventures described below for the purpose described further below to the extent otherwise permissible under applicable laws and regulations.

Items of co-use: information of personnel at institutional clients and transaction parties, etc., shareholders, investors and other concerned individuals (names, titles, addresses, phone numbers, e-mail addresses, etc.)

Group companies: Citigroup Inc. and its consolidated subsidiaries identified in its public financial statements (Exhibit 21.01 of Form 10-K, available at the website of the U.S. Securities and Exchange Commission (<http://www.sec.gov/>)).

Affiliated joint ventures: the Japan-based joint ventures identified in Citigroup's Japan website (<http://www.citigroup.jp>).

Purposes of co-use:

- ☐ To propose and coordinate delivery of products and services of domestic and overseas group companies to institutional clients and transaction parties, etc.;
- ☐ To research and develop financial products and services by conducting market research, data analysis and questionnaires; and
- ☐ To propose the products and services of group companies by sending direct mail, etc.

What rights do you have over your Personal Information?

Your rights over your Personal Information are protected by laws in Japan these are:

- Right to be informed
- We must notify you of the purpose, collection and use of your non-public Personal Information. One exception is where we have collected public information about you
- Right to access your information:
 - You can [contact us](#) to request a copy of the Personal Information we hold about you
- 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
 - You can [contact us](#) to ask us to erase Personal Information that we hold about you
 - There may be some instances where we are not able to erase your Personal Information. For example, where it is a legal requirement for us to continue to process your information. If this is the case we will clearly explain the reason why we are unable to stop processing 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. For example, if you do not provide us with a particular reason for wanting the restriction.

We may not always be able to agree to your rights request. We will always respond to your request without delay. We will need to verify your identity before we share any details relating to Personal Information. If you are making a request on behalf of someone else (e.g. a friend or relative) we may require further information to ensure that you are authorised to make the request. When we respond to your request we will explain clearly whether we accept your request, the rationale for our decision, and what will happen next.

Contact Information

If you have any questions or comments about this Supplement, the ways in which we collect and process your Personal Information described in this Supplement or in the Privacy Notice, or your choices and rights regarding the collection, processing, or use of your information; or if you wish to exercise your rights under applicable law, please do not hesitate to contact us [here](#).