

To Citigroup Customers

Our goal is to maintain your trust and confidence when handling personal information about you.

You Have Choices:

As a Citigroup customer, you have the opportunity to make choices. As you consider this, we, Citibank N.A., Tokyo Branch ("we" or "Citibank Tokyo"), encourage you to make choices that enable us to provide you with high quality products and services that help you meet your financial needs and objectives.

Security of Personal Information:

The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet or exceed applicable law. 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.

Declaration of Protection of Personal Information by Citibank N.A., Tokyo Branch

We are aware that the personal information of our customers is the important property of each customer and its appropriate protection and use is one of our most important considerations. We hereby declare that we make efforts at all times to accomplish appropriate protection and use of customers' personal information.

Handling of Personal Information by Citibank Tokyo

1. We will comply with all applicable laws, regulations and guidelines in relation to customers' personal information, and safeguard, according to strict standards of security and confidentiality, any information our customers share with us.
2. We will collect customers' 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 customers' consent is obtained or other exceptions apply, we will limit the use of personal information of our customers to the minimum we require for implementing the purpose of use preliminarily disclosed to customers. If we change such purpose of use, we will promptly announce or notify the customers of such change. For details of the disclosed purposes of use, please refer to purpose of use for general bank product and other services [below](#). We will specifically define the purpose of use so that it will be clear to customers 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 customer 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 the customers' information to outside parties unless one of the following applies:
 - ☐ the customer 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
- ☐ 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 customers so request, we will cease to use the customers' personal information for purposes of direct marketing (sending direct mail, telemarketing, etc.).

10. We will take all possible measures to keep customer files complete, up-to-date and accurate. We will announce to or notify our customers how and where to conveniently access their account information handled by us, such as name and home address. If there is a request for disclosure, correction and suspension of use of the personal information which we deal with, upon confirmation that such request is made by the customer himself/herself or the proxy authorized by the customer, we will take such measures for disclosure, correction and suspension of use unless there is any special reason not to do so.

11. 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.

12. 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.

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

14. Please contact the following number for any questions regarding our handling of personal information, requests for disclosure, correction, or suspension of use, etc., complaints, security management measures, or any other questions regarding the personal information

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

(Contact Information by postal mail regarding Customers' Personal Information (including, complaints, disclosure requests, security management measures, etc.,))

Otemachi Park Building,
1-1-1 Otemachi, Chiyoda-ku,
Tokyo 100-8132
Citibank N.A., Tokyo Branch

Operations
Operations Controls

The address and name of corporate representative related to publication of matters related to retained personal data:
<https://www.citigroup.jp/jp/about/cbna-tokyo/index.html>

Scope of Business Operations

<Bank Name>: Citibank N.A., Tokyo Branch

1. Accepting deposits, dealing with domestic exchange, money-changing, providing loans, dealing with foreign exchange and other operations incidental thereto;
2. Registered Financial Institution businesses and other operations incidental thereto;
3. Other business operations which a bank can operate and other operations incidental thereto (including those which a bank will come to operate).

Purpose of Use for general Bank product and other services

1. To deal with opening accounts for various financial products, transactions, applications of the financial products and services with customers;
2. To confirm various matters including the identity of customers and others pursuant to the Law for Prevention of Transfer of Criminal Proceeds or any other applicable laws and regulations, or to confirm the eligibility of customers for the financial products and services;
3. To manage continuous transactions, such as controlling the date of depositing or foreign exchange;
4. To make decisions on or manage applications for loans or other continuous transactions;
5. To make decisions on the appropriateness of the financial products and services, in light of the principles of suitability, etc.;
6. To disclose Personal Information to third parties (including third parties in foreign countries) to the extent necessary for proper operation of the business pursuant to your consent or the measures prescribed in this Declaration;
7. To properly handle the personal information entrusted by other business entities when any part or all of the handling is entrusted;
8. To exercise the rights or implement the obligations under agreements with customers or laws;
9. To research and develop financial products and services by conducting market research, data analysis and questionnaires;
10. To propose financial products and services, such as sending direct mail;
11. To propose the products and services of allied companies;
12. To deal with termination of transactions or management after the termination;
13. To send notices regarding opening accounts, products, seminars, etc, or to conduct data analysis, based on the information given at the time of the various information requests or applications for opening accounts, products, seminar, etc.
14. To contact a pre-notified number in case of emergency;
15. To maintain and safeguard the office and other facilities;
16. To ensure that telephone banking transactions will be duly consummated or that inquiries from customers will be duly handled;
17. To properly and smoothly implement the transactions with customers.

Co-Use of Personal Data

(1) Co-Use of Dishonor Information

- **Items of Personal Data to be Co-Used**

The information regarding the drawer of dishonored note/check (or acceptor of bill of exchange. This shall apply hereinafter) and applicant for opening a current account as follows:

1. Name of the relevant drawer (in case of a corporation, its name, name of representative and title of representative);
2. Trade name of the relevant drawer if any;
3. Address (in case of a corporation, place where it is located) (including the zip code);
4. Name of applicant for opening a current account (in case of a corporation, name, name of representative, title of representative and trade name (if any));
5. Date of birth;
6. Occupation;
7. Capital (only in case of a corporation);
8. Category and face value of the relevant note or check;
9. Distinction between a report of dishonor (the first dishonor) and report of suspension of transactions (disposition of suspension of transactions);
10. Date of exchange (Date of presentation);
11. Paying Bank (including the name of department or branch);
12. Out-clearing Bank (including the name of department or branch);
13. Reason for dishonor;
14. Date of disposition of suspension of transactions;
15. Clearing house in which the paying bank (branch) of the dishonored note/check is participating and the bankers association to which the relevant clearing house belongs.

(Note) If the information regarding 1 through 3 above described in the dishonored note/check is different from the information that has been filed with the paying bank, the information described in the relevant note/check shall be included.

- **Scope of Co-Users**

1. Local clearing houses;
2. Financial institutions participating in local clearing houses;
3. Each local bankers' association which is a special member of Japanese Bankers Association (including Reference Center to Persons Whose Transactions Are Suspended of each local bankers association).

A list of co-users may be found on the website of Japanese Bankers Association below.

<https://www.zenginkyo.or.jp/abstract/outline/>

- **Purpose of Use**

Securement of smooth distribution of notes and checks and judgments by financial institutions in credit transactions of their own.

- **Address and Name of Person Responsible for Management of Personal Data**

Bankers association to which the clearing house belongs in which the paying bank of the dishonored note/check is participating.

The address and name of the representative may be found on the following website:

<https://www.zenginkyo.or.jp/>

(2)Co-Use with Group Companies, Affiliated Joint Ventures, Allied Companies and Other Third Parties

A. Internal controls, credit risk management, etc.

1. Citibank N.A., Tokyo Branch co-uses personal information with the group companies and affiliated joint ventures described in A.3 for the purposes described in A.4 to the extent otherwise permissible under applicable laws and regulations.

2. Items of co-use: name, title, address, phone number, e-mail address, account information, transaction details, etc.

3. 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 & Exchange Commission (<https://www.sec.gov/>)).

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

4. Purposes of co-use:

- ☐ To confirm various matters including the identity of customers and others pursuant to the Law for Prevention of Transfer of Criminal Proceeds or any other applicable laws and regulations, or to confirm the eligibility of customers for the financial products and services;
- ☐ To coordinate compliance, risk management, audit and other internal control activities among group companies and affiliated joint ventures;
- ☐ To coordinate management and oversight activities among group companies and affiliated joint ventures; and
- ☐ To screen and detect fraudulent activities and to prevent of related customer losses.

5. Name of the entity responsible for personal information management: Citibank N.A., Tokyo Branch

B. Delivery of global products and services to institutional clients, transaction parties, etc.

1. Citibank N.A., Tokyo Branch co-uses personal information with the group companies and affiliated joint ventures described in B.3 for the purpose described in B.4 to the extent otherwise permissible under applicable laws and regulations.

2. 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.)

3. 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>).

4. 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.

5. Name of the entity responsible for personal information management: Citibank N.A., Tokyo Branch
Address and its representative: <https://www.citigroup.jp/jp/about/cbna-tokyo/index.html>

C. Delivery of services related seminars, lecture meetings and other events hosted by Citibank N.A., Tokyo Branch and/or co-sponsored with third parties.

1. Citibank N.A., Tokyo Branch co-uses personal information with third parties described in C.3 for the purpose described in C.4 to the extent otherwise permissible under applicable laws and regulations.
2. Items of co-use: Information of names, corporate profiles (including name of company/organization, department, and title, etc.), address, telephone number, e-mail address of those who apply for and/or participate in seminars, lecture meetings and other events (the "Seminars") hosted by Citibank N.A., Tokyo Branch or co-sponsored with third parties as well as information contained on business cards provided by those who apply for and/or participate in the Seminars
3. Third party companies and/or organizations which co-sponsor the Seminars with Citibank N.A., Tokyo Branch as well as outside lecturers of the Seminars (the "Seminar Co-Sponsors")
4. Purposes of co-use: For confirming the status of attendance to the Seminars, distributing seminar texts, communicating with seminar participants including schedule changes, gathering and providing feedback in the form of questionnaires, providing future seminar information and post event customer supports which are necessary for managing the Seminars
5. Name of the entity responsible for personal information management:
 - ☐ Citibank N.A., Tokyo Branch
 - ☐ Address and its representative: <https://www.citigroup.jp/jp/about/cbna-tokyo/index.html>
 - ☐ For the avoidance of doubt, if the Seminar Co-Sponsors shares personal information with Citibank N.A., Tokyo Branch, the Seminar Co-Sponsors handle the shared personal information in accordance with their own privacy policies, designate their own officer who is responsible for the shared personal information, and set up their own contact point

(3). Limitation on Provision to Third Parties in Foreign Countries

Upon the provision of personal data to third parties in foreign countries, except in the cases falling under any one of (i) through (iii) below, we shall obtain the consent of the principal to the provision of personal data to third parties in foreign countries, in advance.

- (i) Cases where such third party is in a country set forth in the Enforcement Rules having a personal information protection system accepted to be of the equivalent standards to that of Japan;
- (ii) Cases where such third party develops its system, adapting it to the standards set forth in the Enforcement Rules of a system necessary to continuously implement measures equivalent to the measures to be implemented by personal information handling business operators; or
- (iii) Cases set forth in each item of Article 27, paragraph (1) of the Act.

Contact information of complaint for handling personal information

- **All Banks Personal Data Protection Council, Japan Securities Dealers Association**

Citibank N.A., Tokyo Branch is a member of All Banks Personal Data Protection Council that is an Authorized Personal Information Protection Institution for the financial sector and Japan Securities Dealers Association. Contact office for complaint and consultation of All Banks Personal Data Protection Council (JBA Customer Relations Center and Consumer Relations Office) and Personal Information Consultation Office of Japan Securities Dealers Association accept complaint and consultation about the handling of personal information by members.

Regarding handling of the Sensitive Information

Pursuant to the Guidelines for Protection of Personal Information in the Finance Sector (Personal Information Protection Commission/ Financial Services Agency, February 2017), we shall not acquire, use, or provide to a third party, sensitive information (special care-required personal information set forth in Article 2, paragraph (3) of the Act on the Protection of Personal Information, or information on individuals' membership in a labor union, family origin, registered domicile, healthcare, and sex life (among these, excluding the matters falling under the category of the personal information requiring special care) (excluding any information made public by the person in question themselves or by a national government organ, local public entity, academic research institute, etc., or any of those set forth in the items of Article 57, paragraph (1) of the Act or the items of Article 6 of the Enforcement Rules, and seemingly clear information acquired by visual observation, filming or photographing of the person in question)), except in the cases listed in the guidelines above.

Further, since the purpose of use of the sensitive information is limited under the Enforcement Regulations of the Banking Law, we do not use the sensitive information for any purpose other than those provided under such Regulations.

Handling of the Specified Personal Information

Citibank Tokyo, in line with the "Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure" (hereinafter, "Number Act"), shall handle customers' Individual Numbers and personal information including the Individual Number (hereinafter, "Specified Personal Information" or "SPI") per below.

1. Directive for handling of Specified Personal Information

Citibank Tokyo, while handling customers' SPI, shall comply with the Number Act, the Act on the Protection of Personal Information, other applicable laws, regulations, guidelines, Citibank Tokyo's publicized declaration of protection of personal information and relevant internal policies and standards.

2. Use of Specified Personal Information

Citibank Tokyo hereby announces to obtain customers' SPI for following purposes. Citibank Tokyo, when obtaining customers' SPI, shall notify, publicly announce or display the purpose of use (except when such display or others are not required under the applicable laws or regulations). Citibank Tokyo will only use customers' SPI for the following purposes to the extent of permitted scope under the Number Act. Citibank Tokyo will announce changes to the purposes whenever such changes have been made.

- (1) Administrative generation of legal documents related to interest rates.
- (2) Administrative generation of legal documents related to financial product transactions.
- (3) Administrative application for account opening related to financial product transactions.
- (4) Administrative generation of legal documents related to the payment for transfer of stock and trust beneficiary rights and other administrative works pursuant to the Act on Book-Entry of Company Bonds, Shares, etc.
- (5) Administrative generation of legal documents related to futures transactions.
- (6) Administrative generation of legal documents related to gold bullion transactions.
- (7) Administrative application for tax-free savings systems.
- (8) Administrative generation of legal documents related to overseas remittance.
- (9) Administrative generation of legal documents related to reward payments.
- (10) Administrative works relating to deposit account numbering

3. Safety Management Measures

Citibank Tokyo, in handling customers' SPI, shall implement relevant internal policies and standards and appropriate safety management measures preventing leakage, loss, impairment, etc. of

customers' SPI. Citibank Tokyo will engage in continuous evaluation, review and improvement with respect to those safety management measures. Further, necessary and appropriate oversight will be implemented for any employees or vendors (including re-outsourced vendors) that may handle customers' SPI.

(Contact for Questions regarding Customers' Specified Personal Information)

Please contact the following address by postal mail for any questions regarding our handling of customers' SPI, requests for disclosure, correction, or suspension of use, etc., complaints or any other questions regarding SPI.

Otemachi Park Building,
1-1-1 Otemachi, Chiyoda-ku,
Tokyo 100-8132
Citibank N.A., Tokyo Branch
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[Please kindly note that the original of the Basic Policy is made in Japanese language and this English version is a translation for reference purpose only. If there is any discrepancy between any portion of the Japanese version and the English version, the Japanese version shall prevail.]

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