

Supplemental Provision – Bangladesh

“Notification relating to the Personal Data Protection Act, 2026 (Act No. 63 of 2026) of Bangladesh (the PDPA)”

This Bangladesh Supplemental Provision (the “**Supplement**”) complements the [Global Privacy Notice \(Institutional Clients\)](#) – Global Markets, Commercial and Investment Banking & Financial Services (the “**Global Privacy Notice**”). In the event of conflict, these supplemental provisions will take precedence. Terms used in this Supplement have the same meaning given to them in the PDPA (as defined below) and modify any similar terms in the Global Privacy Notice.

The Global Privacy Notice, as complemented by this Supplement, applies to the processing of personal information of individuals who have products or accounts opened with Citibank N. A.’s branch office in Bangladesh at 8, Gulshan Avenue, Gulshan-1, Dhaka-1212 and their service recipients, and all other persons who have data protection rights under Bangladesh’s Personal Data Protection Act, 2026 (Act No. 63 of 2026) (the “PDPA”) (all these are referred to as “you”). This Supplement formally constitutes a “Notification relating to the Personal Data Protection Act, 2026 (Act No. 63 of 2026) of Bangladesh”

Contact Information

If you have any concerns about our processing of your personal information, or wish to exercise any data subject rights, you may use the [Contact Us form](#) referenced in the Global Privacy Notice.

1. Scope and Definition of Data Subject

Notwithstanding anything to the contrary in the Global Privacy Notice, the term "Data Subject" (also referred to as "You" or "Your" in the Global Privacy Notice) shall include any natural person whose personal data is processed by Citi, whether such individual is living or deceased, in accordance with Section 2(3) of the PDPA. The rights granted under this Supplement may be exercised by the legal heirs, executors, or authorized representatives of a deceased data subject.

2. Age of Consent for Minors

For the purposes of processing personal data in Bangladesh, a "Child" is defined as any individual under the age of 18 years, pursuant to Section 2(19) of the PDPA. Citi will not knowingly collect or process the personal data of a child in Bangladesh without obtaining the prior, explicit, and verifiable consent of their parent or legal guardian. Such consent shall remain valid until the child reaches 18 years of age.

3. Expanded Sensitive Personal Data Categories

In addition to the categories of Sensitive Personal Information identified in the Global Privacy Notice, the following data types are classified as Sensitive Personal Data under Section 2(21) of the PDPA and will be subject to enhanced security and explicit consent requirements:

- Real-time instant location or real-time geo-location (GO-location) data;
- Offenses alleged to have been committed by you, as well as actual criminal records, proceedings, and convictions;
- Trade union membership;
- Genetic and Biometric data (including fingerprints, facial recognition data, and iris scans); and
- Government-issued unique identification numbers (including National Identity Card (NID) numbers, Passport numbers, and Taxpayer Identification Numbers (TIN/TIN/PAN)).

4. Lawful Basis for Processing

Under this Supplement, Citi will primarily rely on your explicit, voluntary, specific, clear, and withdrawable consent to process your personal data and sensitive personal data, in accordance with Sections 5 and 7 of the PDPA. Where processing is conducted without consent under the basis of "Legitimate Interest" (Section 5(3)), Citi will strictly adhere to the principles of benefit, necessity, proportionality, and purpose limitation as prescribed by PDPA and its associated regulations. Citi bears the burden of proof for demonstrating that proper consent was obtained.

5. Your Enhanced Privacy Rights

In addition to the rights set forth in Section 7 of the Global Privacy Notice, you possess the following statutory rights under Chapter Three of the PDPA 2026, which are universal, inherent, non-transferable, and cannot be waived or varied by contract or notice (Section 10(4)):

- **Right to Disclosure of Shared Third Parties:** When exercising your Right of Access (Section 11), you have the right to receive, along with a copy of your personal data, a detailed statement identifying the specific identity of all persons, data fiduciaries, or processors with whom Citi has shared your personal data (Section 11(4)).
- **Right to Prevent Processing Likely to Cause Damage:** You have the right to request that Citi cease or prevent the processing of your personal data if such processing is likely to cause you significant damage or distress. Citi will stop such processing and keep you informed of the actions taken (Section 13(5)).

- **Right to Mark Data as "Disputed":** If Citi refuses your request to correct, complete, or update your personal data under Section 12, and you are unsatisfied with Citi's written logical justification for refusal, you have the right to compel Citi to mark the relevant personal data as "disputed" and notify the National Data Management Authority of the dispute (Section 12(3)).
- **Right to 30-Day Correction Notification:** If Citi corrects, completes, or updates your personal data, Citi will notify you and all concerned third parties with whom the data has been shared within a maximum of 30 days from the date of the correction (Section 12(4)).
- **Right to System-Wide Propagation:** If your personal data is corrected, completed, or erased, Citi will implement system-wide propagation to ensure that these changes are automatically and immediately applied to all secondary fiduciaries, processors, and all copies of the data under Citi's control, including mirrors, caches, backups, disaster recovery (DR) systems, test environments, and migration datasets (Section 14).

6. Mandatory Record Retention

Pursuant to Section 19(1) of the PDPA 2026, Citi will properly preserve all records and registers related to the processing, retention, structuring, erasure, storage, and transfer of your personal data in Bangladesh for a minimum period of 5 (five) years, unless a longer retention period is required by any other laws.

7. Cross-Border Data Transfers

Citi will only transfer your personal data outside the territory of Bangladesh to countries or jurisdictions that maintain appropriate technology, equipment, and legal protections for preserving personal data, as prescribed by the National Data Management Authority (Section 29(4)).