



California Supplemental Provision (Addendum) to Citi Non-Employee & Supplier Online Privacy Notice

Supplemental Provision – California

Last Updated and Effective Date: March 18, 2024

This California Addendum (this “Addendum”) supplements the information contained in the [Citi Non-Employee & Supplier Online Privacy Notice](#) (the “**Privacy Notice**”) and applies solely to individuals who are classified as Non-Employees (as defined below), residing in California, who have rights as consumers under the California Consumer Protection Act (“CCPA”, as amended by the California Privacy Rights Act (together, the “CPRA”)); these individuals are referred to herein as “you,” “your,” and/or Non-Employees. The purpose of this Addendum is to inform and provide additional information to Citi’s California Non-Employees about the categories of Personal Information we obtain and receive, and the purposes for which we use such Personal Information. Unless otherwise defined in the Addendum, any terms used and not otherwise defined in this Addendum have the meaning used in the CPRA. As used in this Addendum:

- “Citi,” “ours” “our” “us” and “we” means Citibank, N.A. and its parent, and its subsidiaries and affiliates.
- “Non-Employees” means current or former: (1) Agency Temporary, (2) Consultants, (3) Contractors, (4) Indirectly Managed Work (IMW), (5) External Services Provider (ESP), (6) ESP - Partner Entity, (7) ESP with Entitlements, (8) Divested Former Employees, (9) Supplier Resource Trainees, either engaged directly by contract with Citi, or through businesses contracting with Citi.
- “Personal Information” is any information that:
 - Identifies or can be used to identify you or your household;
 - Relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you or your household;
 - Can be used to authenticate you or provide access to an account, services or a website;
or
 - Relates to you and that might be Sensitive Personal Information, as defined by the CPRA.

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NOTICE AT COLLECTION; SUMMARY OF PERSONAL INFORMATION HANDLING

The chart and information below describe the categories of Personal Information we collect as well as our Personal Information handling practices with respect to the Personal Information of Non-Employees. In addition, during the past 12 months, we have collected and used the categories of Personal Information specified in the chart below for the business purposes stated therein (depending on the nature of your interactions with us). We will retain Personal Information for as long as necessary for the purposes of our relationship with you or our suppliers, including in connection with performing an agreement with you or our



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suppliers or complying with a legal or regulatory obligation, and in any event, in accordance with the applicable laws in your jurisdiction.

Categories of Personal Information We Collect for Non-Employees	Business Purposes
<p><u>Personal Identifiers</u> – such as your full name, Home Postal Address, Work Postal Address, Home Telephone Number, Work Telephone Number, Mobile Telephone Number, Home Facsimile Number, Work Facsimile Number, Personal E-Mail Address, Work E-Mail Address, Driver's License or Non-Driver Identification Number, Signature, Social Security Number, National ID Number, Birth Certificate Number, Continuity of Business Related Data (e.g. how to contact individuals in case of an emergency), State Issue Identification Number, which are also considered Sensitive Personal Information.</p>	<ul style="list-style-type: none">• Recruit, onboard, maintain and offboard non-employees.• To maintain our relationship with you during the time you provide services and/or support to Citi;• To process invoice payments;• Communicate with you as necessary;• To respond to your inquiries, fulfill requests and request your feedback; and• To fulfil our compliance or legal obligations or as otherwise permitted by applicable Laws.
<p><u>Demographic Information</u> – such as your gender, race, age, citizenship and military status, and marital status.</p>	<ul style="list-style-type: none">• To be compliant with legal and regulatory obligations of Citi in the United States.• Citizenship is used to ensure resources have the relevant work authorization.
<p><u>Characteristics of Protected Classifications</u> – such as your race, sex (including, sexual orientation or gender identity), national origin, citizenship status, immigration status, age, marital status, military or veteran status, political affiliations or activities, which are also considered Sensitive Personal Information.</p>	<ul style="list-style-type: none">• To be compliant with legal and regulatory obligations of Citi in the United States.
<p><u>Geolocation Data</u> – such as the physical location of any device (laptop, mobile device, etc.) connected to Citi systems by satellite, cell phone tower, or wireless local area network signals.</p>	<ul style="list-style-type: none">• Internal operations purposes, including to identify the location of Citi assets and property used by Non-Employees.• To identify access anomalies and improbable travel when Non-Employees access data.
<p><u>Professional, Employment, and Educational Information</u> – such as information about your education, employment history collected during the on-boarding process, resume, curriculum vitae,</p>	<ul style="list-style-type: none">• Develop and implement a Non-Employee directory.



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<p>survey or test results, or cover letter. We may also obtain information about your criminal convictions history, if the law requires us to do so and to the extent permitted by applicable law.</p>	
<p><u>Biometric Information</u> – such as your Photo/ Image documentation (when provided), video/voice recordings (when provided), fingerprints (when provided).</p>	<ul style="list-style-type: none">• For identification and verification purposes.• Provide you access to our premises.• Maintain the security of our premises and the safety of employees, non-employees and visitors.• To facilitate criminal background checks as required or permitted by applicable law or industry standard.
<p><u>Audio and Visual Information</u> – such as your photo/image documentation (when provided), video and/or audio security footage on our premises and your voice recordings (when provided).</p>	<ul style="list-style-type: none">• Provide you access to our premises.• Maintain the security of our premises and the safety of employees, non-employees and visitors.• For quality control and compliance purposes.• To record Citi events for reviewing at a later date.• For Citi promotional materials.
<p><u>Internet or other electronic network activity information</u> – such as usage data through Citi's internal network (e.g. the date and time devices are accessing our systems and what information and files have been downloaded to or presented through those systems) information collected through cookies, web beacons and other technologies (e.g. operating system name and version, device type, browser type, and version), and aggregated information about your visits to, or use of, our systems.</p>	<ul style="list-style-type: none">• Provide access to our systems in a form that can be viewed most easily from your device.• Use of your IP address to determine the general geographic region from which you are accessing our systems.• Review statistical information about the use of the systems in order to improve their design and functionality, to understand how they are used, and to assist us with resolving questions.• Recognize you, your device or your browser when you use our systems so that we can facilitate navigation, and display information more effectively.



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	<ul style="list-style-type: none">To ensure compliance with Citi's Code of Conduct, Global Social Media Procedure, Electronic Communication Policy, and other related policies.
Inference Information – such as information drawn from any of the information identified above to create a profile reflecting the Non-Employee preferences, characteristics, job performance.	<ul style="list-style-type: none">To assess Non-Employee job or assignment performance, surveys, and system usage.
Health and Medical Information , such as disability accommodation requests, COVID-19 Vaccination Details, and other Sensitive Information, provided with your consent.	<ul style="list-style-type: none">Provide reasonable accommodations for disabilities as required by applicable law.Promote workplace safety.

We do not sell or share, as those terms are defined by the CPRA, Non-Employee Personal Information nor have we sold or shared, Non-Employee Personal Information in the past 12 months. Thus, we will not respond to opt-out requests with regard to selling or sharing of the Personal Information of Non-Employees. We do not have actual knowledge of any collection, sale or sharing of Personal Information of individuals under 16 years of age.

We may provide you with the option to limit or restrict the disclosure of certain of your Personal Information (e.g., in our internal directories). We will honor those choices, where provided.

Additional Collection Personal Information: We may collect any other information you provide us in the context of your Non-Employee assignment or status with Citi, or to comply with legal or compliance obligations or company policies.

Aggregated & De-Identified Data: Note that we may collect, use, and share information that does not identify you (including information that has been aggregated or de-identified), except as prohibited by applicable law.

Additional Uses: We may also use all of the Personal Information noted above as we believe necessary:

- To authenticate you so that you can access our systems, websites and services.
- To recognize you, your device or your browser when you use our systems, websites and services so that we can facilitate navigation, display information more effectively, store your preferences and otherwise personalize your experience and enhance the use of the systems, websites and services.
- To manage our business, such as for data analysis, audits, fraud monitoring and prevention, information security, ensuring that the systems, websites and services function properly and



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otherwise administering and improving them, developing new products and services, identifying usage trends, and expanding our business activities.

- To review statistical information about use of the systems, websites and services in order to improve their design and functionality, to understand how they are used, and to assist us with resolving questions about the systems, websites and services.
- To fulfill our compliance or legal obligations or as otherwise permitted by applicable laws, rules or regulations (collectively "law").
- To provide the products or services requested, detect security incidents, and resist malicious, deceptive, fraudulent or illegal activities or as otherwise permitted or required by applicable law.
- To communicate with you about your assignment with us, including responding to your inquires and notifying you of site or policy updates, all on the basis of our legitimate interest in the continuation of our assignment with you or with the organization with which you are associated and with which Citi contracts or has engaged, and the protection of our rights.

Sources of the Personal Information we collect:

We collect and obtain information from:

- **You or Your Organization.** We collect your information when you or your organization provide it to us directly offline or online (i.e. information collected from the organization that you are associated with, such as, the educational institution you attend, if you are an intern with us; or the company you work for, if you are contractor at Citi). We may collect additional Personal Information in the course of your assignment with us. This can be in the form of information you or your organization provide directly to us or information which we collect automatically about you, such as monitoring computer access and usage.
- **Service Providers and Contractors.** We work with vendors, service providers, and contractors who collect information on our behalf in order to provide services to us. Our service providers who provide software as a service collect cookies and provide us with reporting which include the IP address, activity, and network, web browser used and in some cases, a device identifier so that we can understand how our systems are being used.
- **Third Parties.** We collect information about you from third parties, such as benefits providers, past employers, background check providers, employment agencies, the government, and recruiters



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DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose Non-Employee Personal Information as described in this Addendum and as specified below to:

- **Vendors and service providers**, which are companies we use to support our business and who are bound by law and contractual obligations to keep your Personal Information confidential. Service providers may use information we share with them only for the purposes for which we disclose it to them. The categories of service providers that we share Personal Information with and the services they provide are:
 - **Auditing and accounting firms**, such as firms that assist us in the creation of our financial records.
 - **Professional services consultants**, such as firms that perform analytics, assist with improving our business, provide legal services, tax consultants, assists with Non-Employee training and other development, or supply project-based resources and assistance.
 - **Security vendors**, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - **Employment agencies and workforce solutions providers**, such as entities that assist with finding personnel or temporary staff members.
 - **IT vendors**, such as entities that assist with website design, hosting and maintenance; data and software storage; and network operation.
 - **Talent management vendors**, which include companies that help us provide training and other talent development services.
 - **Government and Regulatory Authorities**.
- **Mergers, Acquisitions, and Business Transfers**. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Citi's assets or capital stock, in which Personal Information held by Citi about Non-Employees is among the assets transferred.
- **Affiliates**. To our affiliates, subject to the terms of this Addendum or otherwise as we disclose to you at the time the data is collected.



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Your Rights and Choices

The CPRA affords consumers residing in the California certain rights with respect to their Personal Information, subject to certain exceptions. Subject to certain limitations, you have the following rights in California:

- (1) Right to Delete. You have the right to request us to delete the Personal Information we have collected about you.
- (2) Right to Correct. You have the right to request us to correct inaccurate Personal Information we maintain about you.
- (3) Right to Know and Access. You have the right to know and access the Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- (4) Data Portability. You have the right to receive the information under right (3) in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the Personal Information to a person without impediment, where the processing is carried out by automated means.
- (5) Right to No Discrimination. You have the right not to be discriminated against for exercising any of your privacy rights.

We do not knowingly “sell” or “share” your Personal Information as those terms are defined under the CPRA. We do not use your Sensitive Personal Information for any purpose other than permitted business purposes.

Exercising Your Rights

To exercise your rights described above, please submit a verifiable request to us at:

- Visiting [Citi Privacy Hub](#); or
- [Calling us at 1-833-981-0270 \(TTY:711\)](tel:1-833-981-0270)

We will need to verify your identity before honoring your privacy right request. Subject to certain limitations, we will honor your privacy rights request within 45 calendar days of receipt of your request, unless we request an extension as permitted by the CPRA.

Authorized Agents

You may exercise your privacy rights described above through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please contact us at:



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- Visiting [Citi Privacy Hub](#); or
- Calling us at 1-833-981-0270 (TTY:711)

Contact Information

If you have any questions about this Addendum, the ways in which Citi) collects and processes your Personal Information described in this Addendum, your choices and rights regarding such use, or wish to exercise your rights under the CPRA, please contact us at: Visiting [Citi Privacy Hub](#) or call us at 1-833-981-0270 (TTY:711).