CITI SOUTH AFRICA (SA)
PAIA MANUAL

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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1. LIST OF ACRONYMS, ABBREVIATIONS, DEFINITIONS AND INTERPRETATION

1.1 **“CEO”** Chief Executive Officer

1.2 **“DIO”** Deputy Information Officer;

1.3 **“IO“** Information Officer;

1.4 **“Minister”** Minister of Justice and Correctional Services;

1.5 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000 (as Amended;

1.6 **“POPIA”** Protection of Personal Information Act No.4 of 2013;

1.7 **“Regulator”** Information Regulator; and

1.8 **“Republic”** Republic of South Africa

DEFINITIONS AND INTERPRETATION

Citi SA means Citigroup Global Markets (Pty) Ltd (registration number (reg): 2000/025866/07), Citigroup Global Markets Nominees (Pty) Ltd (reg: 2001/ 001955/07), and Citi SA Nominees (Pty) Ltd (reg: 2016/094596/07), Citibank, N.A., South Africa Branch (reg: 1995/007396/10);

Citigroup means Citigroup Inc., a corporation organized and existing under the laws of the State of Delaware, and its subsidiaries, but excluding Citi SA ;

Conditions for Lawful Processing means the eight conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA and in paragraph **Error! Reference source not found.** of this Manual, and these conditions comprise of accountability, processing limitation, purpose and specification, further processing limitation, information quality, openness, security safeguards and data subject participation;

Constitution means the Constitution of the Republic of South Africa, 1996;

Customer refers to any natural or juristic person that received or receives services from Citi SA;

Data Subject means the person to whom the personal information relates, which is an identifiable, living natural person, and where applicable, an identifiable, existing juristic person, as ascribed thereto in section 1 of POPIA;

Head, in relation to, a private body means in the case of a natural person, that natural person or any person duly authorised by that natural person;

in the case of a juristic person means

(i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or

(ii) the person who is acting as such or any person duly authorised by such acting person;

Information Officer means the duly authorised Head (as defined in section 1 of POPIA and contemplated in section 1 of PAIA) of Citi SA.

Deputy information Officer means whomever the Head may delegate to perform the role of Information Officer;

PAIA means the Promotion of Access to Information Act no.2 of 2000, as amended from time to time;

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—
(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
(b) information relating to the education or the medical, financial, criminal or employment history of the person;
(c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
(d) the biometric information of the person;
(e) the personal opinions, views or preferences of the person;
(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the

original correspondence;
(g) the views or opinions of another individual about the person; and
(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

Personnel refers to any person who works for, or provides services to or on behalf of Citi SA, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Citi SAF, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;

POPIA means the Protection of Personal Information Act no. 4 of 2013;

POPIA Regulations mean the regulations promulgated in terms of section 112(2) of POPIA;

Private Body means (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
(b) a partnership which carries or has carried on any trade, business or profession; or
(c) any former or existing juristic person, but excludes a public body, as defined thereto in sections 1 of both PAIA and POPIA;

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, as ascribed in POPIA, including—
(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
(b) dissemination by means of transmission, distribution or making available in any other form; or
(c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information; as defined thereto in section 1 of POPIA;

Record means any recorded information regardless of form or medium, as defined thereto in section 1 of PAIA and includes Personal Information;

Requestor means (i) any person, including, but not limited to a public body or an official thereof, making a request for access to a record of that private body; or (ii) a person acting on behalf of the person contemplated in subparagraph (i); as defined thereto in section 1 of PAIA;

Request for Access means a request for access to a record of a private body in terms of section 50, as defined thereto in section 1 of PAIA

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CITI

3.1. Information Officer

Name:	Anastasia Eleftheriades Halamandaris
Tel:	011 944 1875
Email:	anastasia.halamandaris@citi.com

3.2. Deputy Information Officer

Name:	Tsholofelo Machinjike Deputy Information Officer
Tel:	+27 11 944 0743 (landline)
Email:	tsholofelo.machinjike@citi.com

3.3 Access to information general contacts

Email:	informationofficerza@citi.com or information.officer.za@citi.com and icgglobaldataprivacy@citi.com

3.4 National or Head Office

Postal Address:	
	P O Box 1800 Saxonwold 2132 South Africa
Physical Address:	145 West Street

	Sandown Sandton 2196
Telephone:	(+27)(11) 944-1000
Email:	informationofficerza@citi.com
Website:	https://www.citigroup.com/global/about-us/global-presence/south-africa

Should you require to Access to Records, you can complete Form 2 on the Regulator's website: https://inforegulator.org.za/paia/.

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a public body contemplated in section 11[3]; and

4.3.3.2. access to a record of a private body contemplated in section 50[4];

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.7. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.8. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.9. the regulations made in terms of section 92[11].

4.3.10. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.11. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.12. the regulations made in terms of section 92[11].

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://inforegulator.org.za/)

4.6 A copy of the Guide is also available, for public inspection during normal office hours

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private body if-*
  a) that record is required for the exercise or protection of any rights;
  b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
  c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

[8] *Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

[9] *Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[10] *Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[11] *Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding- (a) any matter which is required or permitted by this Act to be prescribed;*
  (b) any matter relating to the fees contemplated in sections 22 and 54;
  (c) any notice required by this Act;
  (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
  (e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

5. CATEGORIES OF RECORDS OF CITI SA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	**Types of the Record**	Available on Website	Available upon request
Personnel Data	Personal records provided by Personnel Records provided by a third party relating to Personnel. Conditions of employment and other Personnel-related contractual and quasi-legal records Internal evaluation records and other internal records Correspondence relating to Personnel Training schedules and material	Internal site	
Customer-related	Records provided by a Customer to a third party acting for, or on behalf of Citi SA Nominees Records provided by a third party to Citi SA Nominees Records generated by, or within Citi SA relating to its Customers, including transactional Records Records provided by a Customer to Citi SA		
Other party	Personnel, Customer or Citi SA Nominees Citi SA Records which are held by another party. Records held by Citi SA pertaining to other parties, including without limitation, financial Records,		

	correspondence, contractual Records, Records provided by other parties, and Records that third parties have provided which relate to contractors and suppliers. Citi SA may possess Records, pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess Records that can be said to belong to Citi SA		
Citi SA	Operational records Databases Information technology Marketing records Internal correspondence Product records Statutory records Internal policies and procedures Treasury-related records Securities and equities Records held by officials of Citigroup		

6. DESCRIPTION OF THE RECORDS OF CITI SA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

This specifies the records which are created and available in accordance with any of the South African legislation.

Category of Records	**Applicable Legislation**
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Code of Conduct for the Banking Association of South Africa	POPIA: Code of Conduct for the Banking Association of South Africa
Human Resources	Basic Conditions of Employment Act No. 75 of 1997 Employment Equity Act No. 55 of 1998 Employment Services Act No. 4 of 2014 Employment Tax Incentive Act No. 26 of 2013 Pension Funds Act 24 of 1956 as amended by Act No. 11 of 2007 Labour Relations Act No. 66 of 1995, as amended Immigration Act No. 13 of 2002
Operational Activities	Banks Act No. 94 of 1990 Currency and Exchanges Act No. 9 of 1933 and Exchange Control Regulations (Currency and Exchanges Manual for Authorised Dealers) Consumer Protection Act No. 68 of 2000 Johannesburg Interbank Average Rate (Jibar): Code of Conduct, Governance Process and Operating Rules JSE Debt Listing Requirements JSE Derivatives Rules and Directives JSE Equities Rules and Directives JSE Interest Rate and Currency Rules and Directives JSE Bond ETP Rules and Directives

	JSE Equity Rules Financial Advisory and Intermediary Services Act No. 37 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CITI SA

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Annual Plan, Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

A) to provide accounts and services to the Customer in accordance with terms agreed to by the Customer;

B) to undertake activities related to the provision of accounts, services and trade transactions, such as, by way of non-exhaustive example:

(1) to fulfil foreign and domestic legal, regulatory and compliance requirements (including US anti-money laundering obligations applicable to Citigroup) and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to any of the Citi SA, Citi SA affiliates and their agents or payment infrastructure providers;

(2) to verify the identity of Customer representatives who contact the Bank or may be contacted by Citi SA;

(3) for risk assessment, information security management, statistical, trend analysis and planning purposes;

(4) to monitor and record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes;

(5) for crime detection, prevention, investigation and prosecution;

(6) to enforce or defend the Citi SA's or Citi SA affiliates' rights; and

(7) to manage the Citi SA's relationship with the Customer, which may include providing information to Customer and Customer affiliates about Citi SA's and Citi SA affiliates' products and services; and

C) the purposes related to any authorised disclosure made in terms of agreement, law or regulation;

D) any additional purposes expressly authorised by the Customer; and

E) any additional purposes as may be notified to the Customer or Data Subjects in any notice provided by Citi SA

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	**Corporate**: Customer Profile information including, account details, payment information, corporate structure, customer risk rating and other customer information including to the extent the categories of information relate to individuals or representatives of customers (e.g., shareholders, directors, etc.) required for the above-mentioned purposes **Individual:** Name; contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory identifiers (e.g. tax identification number, Alien Registration Number); Account information (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; "know-your customer" data, account opening forms; photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of customer signatures). **Cardholders:** Corporate Customers' Directors, officials and staff: Name, contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); systems access permissions; "know-your customer" data (Date Of Birth, Gender, Citizenship Status Or

	Nationality, Place Of Birth), account opening forms (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type), other identification and verification data as contained in images of ID card, passport and/or Visa Number and other documents (Birth Certificate Number); images of customer signatures, voiceprints. **Payment beneficiaries**: Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type; beneficiary address, transaction details; payment narrative and, for certain data transferred from the UK only, National Insurance numbers.
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	Please refer to the Global Workforce Member Privacy Notice ("***Notice"***) which describes how Citi ("***Citi***," "***we***," or "***us***") collects, uses, transfers, stores, disposes and in general 'processes' the Personal Information (as defined in the Notice) of Citi ***employees*** and ***interns***, each individually addressed as "***you***" and equivalent forms, in accordance with the laws of South Africa, during onboarding, (or relocation to South Africa) and your employment or internship with Citi. Please also refer to Privacy Notice – For Employees And Interns

8.3 The recipients or categories of recipients to whom the personal information may be supplied

In addition to Citi SA, its affiliates, their respective representatives, the below includes categories of personal information which may be disseminated and the recipient or category of recipients of the personal information. The below is not a limited list, of recipients of personal information applicable to Citi SA:

Category of personal information	**Recipients or Categories of Recipients to whom the personal information may be supplied**
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus Central Securities Depository Credit bureaus
Assessment or verification	World check Financial Intelligence Centre (FIC) Prudential Authority BBBEE assessment or verification agency Psychometric assessment suppliers Reference checks for former employees SETA (for programmes) South African Qualifications Authority Tracing agent
Defined-benefit Pension Fund closed scheme Unemployment Insurance Fund Psychometric assessment suppliers Reference checks for former employees Official keeper of the register of the shareholders of a company	Alexander Forbes Department of Labour Transfer Secretary

8.4 Planned transborder flows of personal information

When making authorized disclosures or transfers of personal information in terms of section 72 of POPIA, Personal Data may be disclosed to recipients located in countries outside the Republic, which may be subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Through the establishment and continual maintenance and adaptation of the Chief Information Security Officer (CISO) Program, Citi has made a commitment to protect information assets, client information, and personal data. CISO's IS programs are focused on sharing information in a controlled and lawful manner, while protecting the confidentiality, integrity, and availability of our information and information systems. Citi’s certification under the internationally recognized ISO 27001 standard independently confirms that Citi’s cybersecurity program has been implemented to meet the industry best practices.

- Our public systems that facilitate access to sensitive information allow for the use of strong authentication including soft and hard token, encryption, digital certificates and multi-factor authentication (MFA).
- We employ best-practice security measures on websites to help protect the confidentiality of information in transit between browsers and web servers.
- We offer secure email and file transfer services that leverage industry-standard levels of encryption.
- We use layered and comprehensive defences, including advanced intrusion and data leakage detection, intrusion prevention systems, firewalls, anti-malware and anomaly-detection systems to keep unauthorized parties from accessing sensitive information and to timely identify issues.
- Our suppliers are subject to the same standards and are included in information security and business continuity assessments to protect Citi data and systems to which they may have access.
- We require employees, non-employees and other third parties who work with us to adhere to strict privacy and security standards.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on https://www.citigroup.com/global/about-us/global-presence/south-africa;

9.1.2 head office of the Citi SA for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of a Citi SA will on a regular basis update this manual.

Issued by

Anastasia Halamandaris

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Anastasia Eleftheriades Halamandaris - Information Officer
Chief Executive Officer