



## MANUAL/PERSONAL DATA PROCESSING POLICY

CITIBANK COLOMBIA S.A., CITIVALORES S.A. COMISIONISTA DE BOLSA, CITITRUST COLOMBIA S.A. FIDUCIARIA COMPANY and COLREPPFIN LTDA. (all hereinafter "Citi") complying with the provisions of Colombian regulations on Habeas Data and personal data protection (Laws 1266 of 2008 and 1581 of 2012 and other regulations that regulate, add to, or modify them) inform that, in order to develop their corporate purpose, they process personal data in accordance with current regulations and the guidelines established in this Manual/Policy.

Citi processes private, semi-private, and sensitive personal data in accordance with the law and only with the prior, express, and informed authorization of the data subject.

### i) Definitions

**Data Subject:** Natural person whose personal data is processed, whether they are a client, supplier, employee, or any other third party.

**Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or suppression.

**Public Data:** This is data that is not semi-private, private, or sensitive. Public data includes, among others, data related to the civil status of individuals, their profession or trade, and their status as a merchant or public servant. By its nature, public data may be contained in public records, public documents, official gazettes and bulletins, and duly executed judicial sentences that are not subject to reservation.

**Private Personal Data:** This is data that, due to its intimate or reserved nature, is only relevant to the data subject. Examples include: merchant ledgers (Accounting), information extracted from domicile inspections, and telephone numbers, provided they are not in public databases, or salary.

**Semi-private Personal Data:** This is data that is not intimate, reserved, or public, and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of people or to society in general, such as, among others, data related to the fulfillment or non-fulfillment of financial obligations or data related to social security entities.

**Sensitive Data:** This refers to data that affects the intimacy of the Data Subject or whose improper use can lead to discrimination, such as data revealing racial origin or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or those promoting the interests of any political party, or those guaranteeing the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

**Data Controller:** Natural or legal person, public or private, who, alone or in association with others, decides on the database and/or the processing of the data.



**Data Processor:** Natural or legal person, public or private, who, alone or in association with others, performs the processing of personal data on behalf of the data controller.

## ii) Use and purposes of processing

Citi processes the data provided by the data subject for the development of the following purposes:

- To carry out activities inherent to its corporate purpose and its legal nature as a banking establishment, as well as business activities, including credit capacity analysis, risk analysis, prospective analysis or client profile, sales campaigns, commercial campaigns, product marketing, collection procedures, operational procedures, reports, among others, which may imply the transmission of data to Citi companies or to selected third parties by Citi companies in Colombia, inside or outside the country, who will be obliged to comply with Citibank's information protection policies, according to the purposes enshrined herein.
- To send reports and attend to information requirements demanded by Citigroup Inc. entities, local or foreign regulatory entities, administrative, governmental or judicial entities.
- To report to and obtain from risk centers and financial information bank operators, credit information, commercial information, information on compliance or non-compliance with its obligations and other data reported as referred to in applicable law.
- To exchange information with trade associations, for the purpose of conducting studies and analyses relevant to the sector.
- To prevent fraud, consult databases on money laundering and terrorist financing, and security investigations.
- To provide quality in the service rendered, customer service, conduct service satisfaction surveys and manage requests, complaints and claims.
- To consult the data subject's information in private or public databases, national or foreign, as well as health sector entities, private or public, medical histories and the data subject's health status.
- For the development of activities related to human resource administration, including, but not limited to, personnel selection and hiring processes, as well as for the adequate fulfillment of obligations, activities, and procedures derived from the employment relationship before and during its validity or after its termination, and the management of training and organizational culture development programs.
- For the definition, structuring, and execution of Citi's strategic transactions regarding its operation, target market, and services offered, which may involve the transmission or transfer of data to Citigroup Inc. entities or third parties.



- For the evaluation of the capacity, including financial, of proposers or service providers, as well as for the fulfillment of obligations, activities, and procedures derived from the pre-contractual and contractual relationship during its validity and thereafter.
- For statistical, managerial, monitoring, control, financial and commercial analysis purposes, definition of policies and procedures, internal, external, and/or regulatory audits.
- To contact third parties and/or clients for purposes related to the contracted service, the commercial relationship, or due to the status of their obligations.
- Any other purpose required for the development of its corporate purpose or of Citigroup Inc. entities.

### **iii) Citi's Duties**

When acting as controller or processor of personal information, Citi will have the duties established in applicable Colombian regulations.

### **iv) Data Subject's Authorization**

In cases required by law and in cases where it acts as controller, Citi will request the data subject's prior and express consent to process their personal data by any means that can be subsequently proven. Thus, authorization can be obtained in writing, orally, included in a contract or other document signed with the data subject, or validated through unequivocal conduct of the data subject that allows for a reasonable conclusion that such authorization was granted.

In cases where Citi processes data as a Processor, the controller is responsible for obtaining the respective authorization.

### **v) Cases where authorization is not necessary**

In accordance with Article 10 of Law 1581 of 2012, Citi is not obliged to request authorization from data subjects for the Processing of their Personal Data in the following situations:

a) Information required by a public or administrative entity in the exercise of its legal functions or by judicial order. b) Public nature data. c) Cases of medical or sanitary emergency. d) Processing of information authorized by law for historical, statistical or scientific purposes. e) Data related to the civil registry of persons.

### **vi) Transfer and Transmission of Personal Data**

In general, all personal data collected by Citi may be processed directly by other legal entities, integrated companies, affiliates, or those linked to Citigroup Inc.

It is possible that some of these third parties are located outside the territory of Colombia. However, any transfer or transmission of data complies with applicable laws and regulations to guarantee the security and protection of the information.



It is important to note that information is only shared with third parties when necessary to fulfill the economic activity or social purpose of Citigroup Inc. entities.

#### **vii) Rights of the Data Subjects**

The data subject enjoys the rights established by Colombian personal data protection regulations, as follows:

- Send requests to Citi related to the handling of their personal data for purposes such as knowing, consulting, updating, rectifying, deleting, among others, through the channels provided for this purpose in this policy.
- Request proof of the authorization granted to Citi as data controller, except in cases where the law does not require such authorization.
- Request the revocation of authorization and/or suppression of data when there has been a violation of their rights or constitutional and legal principles have not been respected. Revocation and suppression will not apply when there is a legal or contractual duty to remain in Citi's databases.
- Request information from the controller or processor about the use of their personal data.
- File complaints before the Superintendence of Industry and Commerce for infringements.

The rights of children and adolescents will be exercised by the persons authorized to represent them.

#### **viii) Persons Authorized to Exercise the Rights**

The following are authorized to file requests, queries, and claims with Citi:

- a. The Data Subject, who must prove their identity by attaching a copy of their identity document.
- b. The Data Subject's successors, who must prove such status to Citi through the relevant document proving their status as successor.
- c. The Data Subject's attorney, after proving their status to Citi through a power of attorney.

#### **ix) Channels for Attention**

Data subjects may exercise their rights and formulate requests, queries, or claims to Citi, providing the necessary information for their attention and indicating the right they wish to exercise and the reasons supporting such request, through the channels detailed below. These procedures will be handled by the responsible area, with the coordination of the Personal Data Protection Officer.

##### **1. Office in Bogotá.**

Data subjects may submit queries, request the updating, correction, deletion of their personal data, and/or revoke authorization for the processing of their data (the latter two in applicable cases). Such requests must be submitted in writing to the advisor who will receive them and forward them to the area in charge of the information, where they will be processed within the deadlines established by law. In any case, the request must be accompanied by a copy of the data subject's identity document.



For requests related to minors, in order to verify the relationship with the minor, a birth certificate and a copy of the minor's identity document must be attached.

In the case of being the data subject's successor, in order to verify their relationship with the deceased, a copy of the identity document, birth certificate or marriage certificate (in case of being a spouse), and the data subject's death certificate must be attached.

Citi may request additional documents or define other control procedures in order to verify the identity of the applicant to its satisfaction.

## 2. Email

Data subjects (clients and non-clients) may submit queries, complaints, request the updating, correction, deletion of their personal data, and/or revoke authorization for the processing of their data (the latter two in applicable cases) through the corresponding email, as indicated in section xviii of this document.

Once received, the communication will be forwarded to the area in charge of the information, which will provide a response within the deadlines established by law.

## 3. Channels for attention for employees, collaborators and ex-employees

Citi employees, collaborators, and ex-employees can submit queries and requests by communicating directly to the telephone line 57(601) 4840400 or via email at [hrsslatoamerica@citi.com](mailto:hrsslatoamerica@citi.com).

Once received, the communication will be forwarded to the area in charge of the information, which will provide a response within the deadlines established by law.

Citi may modify these tools or routes available on its website at any time, and for this purpose will inform its employees when this happens, so that they can access the platform that allows them to exercise their right to consult, update, correct and/or delete their data.

### x) Attention to Data Subject Requests

This procedure aims to guarantee the Data Subject the timely exercise of their rights enshrined in the Law and in the Political Constitution. Thus, Citi aims to guide, attend, investigate and resolve the requests submitted by the Data Subjects.

Such requests may be categorized as follows:

**Query:** Refers to the request for information, to know the personal information held in Citi's Databases.

**Claims:** Refers to the expression of non-conformity that is filed against an action considered unjust, through which the Data Subject demands compliance with their rights, to know, update, rectify or delete their Personal Data.

### xi) Request reception process in exercise of rights



Requests submitted by data subjects in exercise of their rights must be accompanied, as far as possible, by the following information:

- Full name and surnames.
- Identity document.
- Contact details and/or notification for the response.
- Reason(s)/fact(s) giving rise to the claim with a brief description of the right to be exercised (know, update, rectify, request proof of authorization granted, revoke it, suppress it, access the information).

#### **a. Attention to queries**

Data Subjects or their authorized representatives may submit queries to know the personal information held in Citi's Databases, through the available channels and related in the Policy.

A response will be provided to the Data Subject by the means they have requested or to the address they have indicated in their request. The response will be issued within ten (10) business days from the date of receipt. However, if the response period needs to be extended, Citi will inform the Data Subject of the reasons why it is not possible to address the request within the indicated period, indicating that the response to their request will be given within the following five (5) business days.

#### **b. Procedure for handling claims**

Data Subjects or their authorized representatives, who consider that the information processed by Citi should be updated, corrected, rectified or suppressed, or when they identify a presumed non-compliance, in accordance with Article 15 of Law 1581 of 2012, may file a claim with Citi, which will be processed as follows:

1. First, it will be verified that the information is the required one to manage the claim.
2. If the request meets all requirements, the processing begins and the data is labeled with the description "CLAIM IN PROCESS".
3. If the information is incomplete, the Data Subject will be informed of the missing requirements within five (5) days of receiving the claim, indicating that, if no response is given within the next two (2) months, the request will be considered withdrawn.
4. Once the information is verified, a response will be provided by the means requested or to the address indicated by the data subject. The response must be issued within fifteen (15) business days from the date of receipt.
5. If it is not possible to provide a response within the specified period, the Data Subject will be informed of the reasons why the request cannot be addressed within the previously indicated period, notifying the Data Subject that the deadline is extended by an additional eight (8) business days and indicating the response date.



6. Finally, the response is sent, and a record is kept of it. If the claim proceeds, what was requested by the Data Subject is fulfilled. If the claim does not proceed, the applicant is answered with the arguments in place, with prior confirmation from Legal, and the Personal Data Protection Officer.

#### **xii) Corporate Policies on Data Protection and Information Security.**

Citi has data protection and information security policies that it has been applying and incorporating into its internal procedures for the protection and management of information and data received; for this reason, Citi has established additional procedures for compliance with this Policy, relying on the areas of information security, compliance, and operations, and also has a Personal Data Protection Officer and an Information Security Officer.

The services that Citi provides and receives from other Citigroup Inc. entities that form part of the activities inherent to its corporate purpose are formalized through Intra-Citi Service Agreement (ICSA) framework contracts signed in compliance with the policy established for these purposes. These contracts establish the terms and conditions under which the information related to the respective service is processed and managed.

#### **xiii) Citi's Data as Controller**

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#### **xiv) Validity of the database**

Personal data will remain in the databases as long as Citi requires them for the development of its activity.

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