

Vietnam Supplements

(To the [Citi Non-Employee & Supplier Privacy Notice](#))

1. Introduction and Scope

These Supplemental Provisions for Vietnam (the “**Supplement**”) are to be read in conjunction with the [Citi Non-Employee & Supplier Privacy Notice](#) (together “**Privacy Notice**”). They apply to you if you are a person whose personal data is protected under Vietnamese law, including the Law on Personal Data Protection No. 91/2025/QH15 (“PDPL”) and Decree No. 356/2025/ND-CP (“Decree 356”) and as amended from time to time.

This Supplement provides additional information required under Vietnamese law. In the event of any conflict or inconsistency between the Citi Non-Employee & Supplier Privacy Notice and this Supplement, the provisions of this Supplement shall prevail for the processing of Personal Data subject to Vietnamese laws.

2. Data Controller in Vietnam

For the purposes of Vietnamese law, the data controller or for your personal information is Citibank N.A. Ho Chi Minh Branch and/or Ha Noi Branch (collectively and each referred to as “Citibank N.A., Vietnam Branch” under Legal Vehicle ID: 11135 in Citi Non-Employee & Supplier Privacy Notice) or “Citi” or “We” hereafter in the context of this Supplement).

3. Personal Data We Process

Under Vietnamese laws,

- a) “**Personal Data Processing**”¹ refers to activities impacting personal data, including one or more of the following: collection, analysis, summary, encryption, decryption, modification, deletion, destruction, de-identification, provision, disclosure, transfer of personal data, and other activities impacting personal data.

¹ As provided in Article 2.1 of PDPL

b) “**Personal Data**” means digital data or other forms of information that identifies or can be used to identify a specific individual. Personal Data includes Basic Personal Data and Sensitive Personal Data and is classified into "Basic Personal Data" and "Sensitive Personal Data."

i) Basic Personal Data²: this includes, but is not limited to:

- Full name, other names (if any)
- Date of birth; date of death or missing
- Gender
- Place of birth, residence information, hometown, contact address
- Nationality
- Images of the individual
- Phone number, personal identification number, passport number, driver's license number
- Marital status
- Information on family relationships (parents, children, spouse)
- Information on digital accounts
- Other information associated with a specific individual or capable of identifying them.

ii) Sensitive Personal Data³: this includes data that, if infringed upon, would directly affect your legitimate rights and interests. We will only process sensitive personal data with your explicit consent, unless otherwise permitted by law. This includes:

- Political opinions, religion, and belief
- Health status and private life information as recorded in health records (excluding blood type)
- Racial or ethnic origin
- Genetic and biometric data
- Data on crimes and violations of law

² As outlined in Article 3 of Decree 356

³ As outlined in Article 4 of Decree 356

- Financial and credit information, including bank account details and transaction history
- Location data determined through positioning services
- Other data specified by law as specific and requiring necessary confidentiality measures.

4. Lawful Basis for Processing

We will process your personal data based on the lawful bases described in the Privacy Notice. In Vietnam, this primarily relies on your **consent**, unless processing is permitted without consent, in situations such as (but not limited to) protect life and health in an emergency, to respond to threats to national security, or for the operations of state agencies⁴. In these specific cases where we process your personal data without your consent as permitted by law, we remain fully committed to protecting your personal data including supervision measures legally required, such as internal controls, risk assessment, oversight and audits and feedback mechanisms⁵.

Your consent must be voluntary, based on your full awareness, and explicitly expressed. Silence or lack of response will not be considered consent. For sensitive personal data, you will be informed that the data being processed is sensitive⁶.

5. Your Rights and How to Exercise Them

In addition to the rights outlined in the Citi Non-Employee & Supplier Privacy Notice, you have specific rights under Vietnamese law⁷ regarding the timelines for our response to your requests⁸ (e.g. within 2 working days or another timeline provided by applicable laws at the date of proper request) and implement it in a timely manner prescribed by laws, Privacy Notices and/or agreements between You and Citi, as applicable

In cases of complex requests, a single extension may be applied as permitted by law, and you will be timely notified of the reasons.

To exercise these rights, please email dataprivacy@citi.com, as specified in the Privacy Notice.

⁴ As outlined under Article 19 of PDPL

⁵ As outlined under Article 19 of PDPL

⁶ As regulated in Article 9 of PDPL and Article 6 of Decree 356.

⁷ As regulated under Article 4.1 of PDPL

⁸ The details are currently provided in Article 5 of Decree 356

6. Your obligations in relation to Personal Data⁹

You have obligations:

- Self-protection of your personal data; request other relevant organizations and individuals to protect your Personal Data;
- To provide complete and accurate personal data when consenting to the processing of personal data,
- Compliance with the provisions of the law on the protection of Personal Data
- Notify Citi immediately if you discover or suspect that your Personal Data has been disclosed, leaked or any breach of Personal Data protection that You are aware of
- Update and comply with any changes (if any) related to Citi's Personal Data protection policy
- Other obligations as prescribed by laws.

7. Prohibition activities¹⁰

The Law prohibits:

- Processing personal data against the State of the Socialist Republic of Vietnam, affecting national defense and security, social order and safety, legitimate rights and interests of agencies, organizations and individuals
- Obstructing the protection of personal data
- Taking advantage of personal data protection activities to commit acts of violating the law
- Processing personal data in contravention of the law.
- Using other people's personal data, allowing others to use their personal data to commit acts contrary to the provisions of law
- Buying and selling personal data, unless otherwise provided for by law.
- Appropriation, intentional disclosure, loss of personal data.

Violations are subject to significant administrative fines) or criminal prosecution

⁹ As regulated in Article 4.2 of PDPL

¹⁰ As regulated in Article 7 of PDPL

8. Personal Data Processing Impact Assessment¹¹

As required by laws, for our personal data processing activities, we prepare and maintain a dossier for the impact assessment of personal data processing. This dossier is available for inspection by the personal data protection authority. You may be required to cooperate and provide Citi information/data sufficiently and timely for Citi completion of such impact assessment.

9. Cross-Border Transfer of Personal Data¹²

Your personal data may be transferred to, and processed in, locations outside of Vietnam as described in the Privacy Notice. We will perform a cross-border personal data transfer impact assessment.

A dossier for this impact assessment will be prepared and submitted to Vietnam's personal data protection authority. You may be required to cooperate and provide Citi information/data sufficiently and timely for Citi completion of such impact assessment.

10. Use of Advances Technologies

Further to Citi's commitments in Section 7 "[Automated Processing, Automated Decision Making, and Artificial Intelligence](#)" of the Citi Non-Employee & Supplier Privacy Notice, in case of using advanced technologies (including but not limited to AI/ Metaverse, Cloud, Big Data and BlockChain), we also fully adhere the personal data protection principles as required by laws, including but not limited to the followings:

- Artificial Intelligence (AI): In cases where we use AI or automated systems to process your personal data, we will inform you of this activity and explain the principle of operation of an algorithm and potential impact of these systems on your rights if any.
- Blockchain Technology: If we utilize blockchain technology in our operations, we ensure that personal data is protected. We will not store readable personal data directly on a blockchain. Instead, we will use cryptographic methods, such as encrypting the data or storing only its unidentifiable hash value, to ensure its integrity and security cannot be compromised.
- Cloud Services: We apply technical and organizational measures to prevent personal data from being accessed without authorization in case of implementing cloud services.

¹¹ As required by Article 21 of the PDPL and Article 19 of Decree 356

¹² In compliance with Article 20 of the PDPL and Article 18 of Decree 356

- Big Data: We apply measures to ensure network security, data security and prevent personal data loss in processing storing and transmitting personal data

11. Notification of Personal Data Protection Violations

In the event of a violation of personal data protection regulations, we will notify the personal data protection authority within **72 hours** of detection¹³, and

If the violation involves your location data or biometric data, we will also notify you within 72 hours from the time the violation is detected¹⁴.

12. Protection of Children's Personal Data¹⁵

The processing of personal data of children aged 7 or older, aimed at disclosing information on their private life or personal secrets, requires the consent of both the child and their legal representative.

13. Data Protection Officer (“DPO”)

For any questions or to exercise your rights, please contact our Data Protection Officer:

VietnamDPO@citi.com

14. Non – influence.

This Supplement does not derogate from any our Terms and Conditions of any agreement with You and or Your Organisation if any. Any rights under the Privacy Notice shall be additional and without prejudice to other rights of collection, use, disclosure, and other personal data processing activities available pursuant to such Terms and Conditions or under applicable laws and regulations, and nothing herein is to be construed as limiting any contractual or legal rights.

¹³ As required by Article 23 of the PDPL

¹⁴ As required by Article 29 of Decree 356

¹⁵ In accordance with Article 24 of the PDPL

15. Changes to this Privacy Notice

Citi may amend, change, or update this Supplement from time to time, whereby Citi will notify you about such changes via Citi website of the [Citi Policy and Standards](#).

In the event that the amendment, change, or update will affect the purposes for which your Personal Data has originally been collected, Citi will notify you about such changes and obtain your consent (if applicable), prior to such changes becoming effective.

This Supplement shall take effect **from May 2026 onward**.