

Supplemental Provision — Kingdom of Saudi Arabia

This Supplemental Provision for the Kingdom of Saudi Arabia or "KSA" ("**KSA Supplement**") supplements the information contained in the Global Privacy Notice for Institutional Clients (the "**Global Privacy Notice**") and applies to individuals ('You') who are subject to, or have rights under the Personal Data Protection Law promulgated by Royal Decree No. M/19, dated 09/02/1443H on 24 September 2021 ("**PDPL**") and its Implementing Regulation and Regulation on Personal Data Transfer outside the Kingdom issued on 22/02/1445H (07/09/2023G) (the Implementing Regulations and Data Transfer Regulations together, the "**Regulations**") in relation to the processing of personal information through our services, banking and markets operations.

In this KSA Supplement, capitalized terms have the meaning given to them in the Global Privacy Notice. In the event of conflict or inconsistency, specifically defined terms in this Supplement shall govern and prevail over those terms.

Terms which appear capitalized but that are not defined in the Global Privacy Notice or KSA Supplement have the meaning given under the PDPL and Regulations.

1. Data Controllers

The Data Controller is **Citigroup Saudi Arabia**, Joint Stock Company ("**CSA**") incorporated in 2017 under commercial registration number 1010612164, registered with the KSA Capital Markets Authority under License Number 17184-31.

Our corporate address in Riyadh is on the 20th floor of Kingdom Tower, P.O. Box 301700, Riyadh 11372, Central Province, Kingdom of Saudi Arabia. CSA transfers personal information to other CSA subsidiaries and to non-affiliated foreign entities that also act as separate and independent Data Controllers, where necessary to support its operations or to execute (fulfil) any transaction outside KSA, when instructed by its clients. Please read Paragraph 7 of this KSA Supplement (International Transfers of Personal Information) for information about how we protect any personal information that is transferred over KSA state borders.

Where CSA or designated client organisations in the KSA engage in cross-border activities with an overseas Citigroup subsidiary, Citi affords the same level of protection to all KSA personal data that is processed in an overseas location, and honours KSA data subject rights as set out in this KSA supplement.

2. Lawful Basis of Data Processing

In the KSA, Sensitive Personal Information includes personal information revealing racial or ethnic origin, or religious, intellectual or political belief, data relating to security criminal convictions and offenses, biometric or Genetic Data for the purpose of identifying the person, Health Data, and data that indicates that one or both of the individual's parents are unknown.

Where we process Credit Data within CSA or any security-related or authorized global activities, including profiling your ability to obtain and repay debts and credit history (for example for AML, KYC and corporate due diligence, we will obtain Explicit Consent before doing so.

3. Sources of Personal Information

Where we obtain information about you from Your Organization or other third parties, we have a legitimate interest in doing so for the security, integrity and legality of our operations.

If we need to access any category of Sensitive Personal Information, we will seek your written consent before doing so.

4. Artificial Intelligence, Automated Decision-Making and Profiling

While we are constantly updating our operations, and use Artificial Intelligence for fraud detection and Anti-Money Laundering, we do not delegate decision-making to any system: all our AI activities have human oversight.. In securities markets, we only use information that has been de-personalized by removing identifiers and aggregating the data such that it is no longer possible to reconstitute personal data and re-identify a data subject for automated processing and investments. These practices are also known as ‘anonymization’.

5. Direct Marketing Communications

Where CSA contacts You for products targeted to you or Your Organization, it will always obtain Your Consent prior to sending any marketing communications. We are aware that certain persons acting in bad faith offer false Citi-labelled products. If You receive communications from anyone pretending to be Citi, without your prior knowledge please do not engage with them.

6. Your Privacy or Data Protection Rights

In addition to the rights set out under the Global Privacy Notice, You have the following rights over your personal information:

- **Right to be informed:** You have the right to be informed as to how and why we use your personal information.
- **Right to access your information:** You have the right to access the personal information we hold about you. You also gave the right to request access in a clear and readable format.
- **Right to contact the competent authority:** You have the right to contact the data protection regulator in the Kingdom of Saudi Arabia if you are not satisfied with our use of your Personal Data or response to the exercise of your rights. The relevant data protection regulator is the Saudi Data and AI Authority (SDAIA). They can be contacted here: <https://sdaia.gov.sa/en/Contact/Pages/ContactUs.aspx>

Please note that certain data rights in the Global Privacy Notice are not available in this jurisdiction: specifically, the right of data portability and right to object to processing (however, please note that requirements for processing are equally tightened under the PDPL: for example we do not process your personal data for the legitimate interests of any party other than CSA.

7. Disclosures and Recipients of Personal Information

Where we Disclose Your personal information to third parties (including our affiliates), we will always do so in accordance with applicable law.

8. International Transfers of Personal Information

CSA may transfer certain personal information to other Citi subsidiaries and third parties (such as banks, security exchanges and financial or account services providers and other service providers) who are located both in the KSA and outside the KSA. This may include data being transferred by Citi, for reasons outlined in the Global Privacy Notice and this KSA supplement to other Citi subsidiaries and third parties outside the KSA. We may also use cloud services providers to process your data under appropriate technology and operational security measures.

Certain operations are also supported from key service centres in the United Kingdom and the European Union, subject to Regulation (EU) 2016/679 'General Data Protection Regulation' deemed to be the most protective. Even where data is transferred to those countries we adapt our practices to reduce any differences with the KSA Personal Data Protection Law, including by way of example a limitation on processing under legitimate interests, as explained above, are restricted..

Where the country or territory to which Your personal information is transferred does not provide legal protection that is equivalent to that offered in the KSA, we only transfer your personal information where we are otherwise permitted to do so by applicable law, if, for example, a special circumstance applies (e.g. the transfer is necessary for the performance of a contract with You, the transfer is necessary to comply with certain legal obligations or it is to protect Your vital interests) and/or we have implemented certain additional and appropriate safeguards to protect it as set out in the Global Privacy Notice, including:

- ensuring that standard contractual clauses approved by the competent regulatory authority are in place between us and the entity receiving your personal information; or
- ensuring that there are binding common rules approved by the competent regulatory authority in place between us and the entity receiving your personal information; and
- ensuring that we have carried out an assessment in respect of the transfer we want to undertake.

9. Retention of Personal Information

In addition to the terms set out at Section 10 of the Global Privacy Notice, we store personal information for as long as is necessary or required for the purpose for which it was collected. In relation to securities accounts and operations in the KSA, the average duration of our retention period is a term of 10 years from the date of account closure or the last transaction, whichever is later. Investment advice records are deleted after 7 years, and prospective business information and sensitive data or are retained for shorter periods, generally not exceeding one year. In certain circumstances we may need to store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, reporting, regulatory, tax, accounting obligations, or in the event of any complaints or challenges, or if we reasonably believe there is a prospect of a regulatory investigation or litigation and your personal information cannot be removed from any records related to a regulatory inquiry or legal dispute.

Should You require further information about how we retain Your personal information in relation to a specific matter you can contact us as per the details set out at the "Data Controllers" section above.

10.Children and Minors

This Privacy Notice is directed to individuals related to institutional clients, and not intended to persons under the age of 18 or that cannot contract on behalf of a legal entity. However, we may process information relating to minors with consent from their parents or guardians, where they are named beneficiaries of trusts, wills or insurance policies, and similar uses as permitted by law.

11. Contact Information

If you have any questions or comments about this Supplement, the ways in which Citi collects and processes your personal information described in this Supplement or in the Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under the PDPL, please do not hesitate to send us your request addressed as follows:

Attention to	The Data Protection Officer
Citi Entity	Citigroup Saudi Arabia
Email	dataprivacycsa@citi.com

Effective Date and Notice of Changes

This Supplemental Provision becomes effective on 14 September 2024 to align it with the current banking and international structure of Citibank. Any further changes to this Supplemental Provision will be published on our website immediately.