



## Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice

### California Addendum

Last Updated and Effective Date: June 13, 2024

This California Addendum (this “**Addendum**”) supplements the information contained in the [Citi Real Estate Services Privacy Notice](#) (the “**Privacy Notice**”) and applies solely to individuals who are related/associated to organizations from whom Citi receives, or to whom Citi provides, real estate services, including without limitation landlords, tenants, subtenants and individuals who are related/associated to organizations that are agents, suppliers, contractors or other contacts of these real estate service providers or recipients (collectively and generically, “**RESP**”), 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 RESP. The purpose of this Addendum is to inform and provide additional information about the categories of Personal Information we obtain and receive, and the purposes for which we use such Personal Information. Unless otherwise defined in this 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.
- “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.

#### **TABLE OF CONTENTS**

I.	<b><u>NOTICE AT COLLECTION; SUMMARY OF PERSONAL INFORMATION HANDLING</u></b>
II.	<b><u>DISCLOSURE OF YOUR PERSONAL INFORMATION</u></b>
III.	<b><u>YOUR RIGHTS AND CHOICES</u></b>
IV.	<b><u>EXERCISING YOUR RIGHTS</u></b>
V.	<b><u>AUTHORIZED AGENTS</u></b>
VI.	<b><u>CONTACT INFORMATION</u></b>

#### **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 RESP. 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 suppliers or



## Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice

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	Business Purposes
<p><b>Personal Identifiers</b>, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"><li>• Onboard, maintain and offboard RESP.</li><li>• To maintain our relationship with you during the time you provide services and/or support to Citi;</li><li>• To process invoice payments;</li><li>• Communicate with you as necessary;</li><li>• To respond to your inquiries, fulfill requests and request your feedback; and</li><li>• To fulfil our compliance or legal obligations or as otherwise permitted by applicable laws.</li></ul>
<p><b>Any Personal Information described in Cal. Civ. Code § 1798.80(e)</b>, such as name, address, telephone number, or financial information.</p>	<ul style="list-style-type: none"><li>• Onboard, maintain and offboard RESP.</li><li>• To maintain our relationship with you during the time you provide services and/or support to Citi;</li><li>• To process invoice payments;</li><li>• Communicate with you as necessary;</li><li>• To respond to your inquiries, fulfill requests and request your feedback; and</li><li>• To fulfil our compliance or legal obligations or as otherwise permitted by applicable laws.</li></ul>
<p><b>Characteristics of protected classifications under California or federal law</b>, such as your age, race, sex (including sexual orientation or gender identity), national origin, citizenship status, immigration status, marital status, military or veteran status, and political affiliations or activities, which are also considered <b>Sensitive Personal Information</b>).</p>	<p>We do not collect.</p>



## Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice

<b>Commercial information</b> , such as records of products or services purchased, obtained, or considered.	We do not collect.
<b>Biometric information or audio, electronic, visual, thermal, olfactory, or similar information</b> , such as your photo / image documentation, video/voice recordings, fingerprints, or voiceprints.	We do not collect.
<b>Internet or other electronic network activity information</b> , including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.	We do not collect.
<b>Geolocation Data</b> , such as the physical location of any device (laptop, mobile device, etc.).	We do not collect.
<b>Professional or employment-related information.</b>	We do not collect.
<b>Inferences</b> drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.	We do not collect.

We do not sell or share, as those terms are defined by the CPRA, RESP Personal Information nor have we sold or shared, RESP Personal Information in the past 12 months. Thus, we will not respond to opt-out requests with regard to selling or sharing of RESP Personal Information. 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 RESP services 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.



## Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice

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

- 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 relationship 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 relationship 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. We may collect additional Personal Information in the course of your relationship 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.
- **Third Parties.** We collect information about you from third parties, such as background check providers, and the government.

### DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose 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.



## Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice

- **Professional services consultants**, such as firms that perform analytics, assist with improving our business, provide legal services, tax consultants, 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.
  - **Government and Regulatory Authorities**.
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- **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 RESP 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.

## 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.



## **Real Estate Services - California Addendum to Citi Real Estate Services Privacy Notice**

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:

- **Calling us at:** 1-833-819-6700 (TTY:711)
- **Sending an e-mail to:** [dataprivacyrealestateservices@citi.com](mailto:dataprivacyrealestateservices@citi.com)

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:

- **Calling us at:** 1-833-819-6700 (TTY:711)
- **Sending us an e-mail to:** [dataprivacyrealestateservices@citi.com](mailto:dataprivacyrealestateservices@citi.com)

### **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 [dataprivacyrealestateservices@citi.com](mailto:dataprivacyrealestateservices@citi.com) or call us at 1-833-819-6700 (TTY:711).