

PRIVACY NOTICE

CLOSED AND DIVESTED CONSUMER FINANCE PRODUCTS

Last Modified: 22 October 2025

This Privacy Notice explains to former customers how Citi stores and processes, for limited purposes, personal information from **Closed or Divested Consumer Finance Products in the United Kingdom, Guernsey, and Jersey..** This Privacy Notice also explains how we process personal data collected from persons associated with the Consumer Finance Products, including insurance or trust beneficiaries, family members, signatories, nominees, and authorised persons, and provides information about their data protection rights and how to exercise them.

In this Privacy Notice:

Citi, means the Citi entities in section 1.1, including the Data Controller.

Closed Consumer Finance Products, means any discontinued Consumer Finance Product

Consumer Finance Products, means personal loans, mortgages, consumer credit cards, and add-on insurance products

Divested Consumer Finance Products, means any such product that Citi transferred to other entities or financial institutions.

This Privacy Notice is not a contract and is not enforceable against you. It does not change or modify any surviving provisions on your consumer finance agreements, or your statutory rights.

1. Does this Privacy Notice apply to you?

1.1 It applies to:

If you were a consumer finance customer, or a person associated with a **Closed or a Divested Consumer Finance Product** that was provided by one of the Citi entities indicated in the table below.

CitiFinancial Europe Ltd
Future Mortgages Ltd (now known as Dukinfield Mortgages Ltd)
Egg Banking plc (now known as Canada Square Operations Limited)

Upon closure or divestment, your customer records were transferred to **Canada Square Operations Ltd**, a Citigroup, Inc., affiliate, incorporated in the United Kingdom, who is the Data Controller.

2. Where does Citi obtain your personal information?

We safeguard and store information that we collected directly from you or that we learnt about you from third parties.

(a) Directly, from You (Art 13 GDPR)	We use personal data that you shared with us or is generated by your transactions, including all categories in Section 4 below.
(b) Personal Information that we received indirectly (Art 14 GDPR)	We also receive personal information sources other than you, including credit reference agencies, fraud prevention entities, background check suppliers, international sanctions lists, and public (or subscription) databases. The categories of information obtained from credit reference agencies may include public information such as defaults and judgments and census or electoral register information.

3. How can you contact the Data Controller?

3.1 If you can contact Citi at the address indicated below:

Canada Square Operations Ltd
PO BOX 4903
Worthing
BN99 3AR
United Kingdom

3.2 If you have any questions, requests, or have any complaints in relation to how we process your personal information, you may also contact Citi's Independent Compliance Officer (the GDPR Data Protection Officer).

GDPR Data Protection Officer
Citigroup
40 Bank Street, 9th Floor
London, E14 5NR
United Kingdom

Email: GDPRDPO@citi.com

Requests for your personal data protection rights (such as access to data) are replied to as soon as reasonably possible and fulfilled no later than 30 days from their receipt. If we consider a response to be complex, we will inform you accordingly, giving us further time (within 3 months from your request).

Complaints are acknowledged within 30 days and may be shared with our regulators.

3.3 If you feel that your personal information has not been handled safely, or you are unsatisfied with the answer to your complaint, you may contact the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Tel +44 1625 545 700, Web: www.ico.org.uk

4. Categories of Personal Information and Processing

4.1 The categories of personal data about you are as follows:

- **Personal Identifiers:** your first and last names and initials, your gender; date of birth, marital status, tax identification number(s), citizenship(s), country of residence.
- **Protected Personal Identifiers:** samples of your signature, copies of passports, driver license, state or national identity cards, or any other unique identification numbers that are considered sensitive personal information, such as US Social Security Numbers, India Aadhar Unique Identifiers and similar, and any public or subscribed sources of personal data.
- **Family personal details:** the names and contact details of your spouse, family members and former dependents, of beneficiaries of trusts, insurance and additional cardholders, and details of your attorneys or persons representing you.
- **Business contact details:** your business or home address; telephone number; email address; and social media profile details.
- **Employment History:** industry; role; business activities; names of current and former employers; their work address; telephone number; work email address.
- **Financial data:** Account identifiers such as bank Identifiers codes account numbers; credit card numbers; cardholder or accountholder name and details; instruction records; transaction details; and counterparty (e.g. payee) details.
- **Telecommunications and Electronic Communications information:** Information obtained in telephone conversations (including VoIP), and video conferencing services (e.g., Microsoft Teams, Zoom, Cisco or others) including numbers, the service used, participants to the call, etc. We may record such calls (with your consent if required) and use anti-fraud tools (such as automated identification of biometric patterns) to detect threat actors, and for your protection. We may also use automated AI tools to prepare automatic summaries or notes of such conversations using Zoom AI Companion or Microsoft Teams Copilot.

4.2 Legal bases, purposes, and categories of personal information we process

The Data Controller processes your personal information for the purposes set out below.

Legal Bases	Purposes of Processing	Categories of Personal Information
(a) Where the processing is necessary in relation to a contract that we have with you	i. To allow a third party to whom your account or product was transferred, to continue accessing your product records, and ii. To comply with instructions that we may receive from you through those third parties.	Personal Identifiers Protected Personal Identifiers Family and related person details Business contact details Employment History Financial Details
(b) Where we are required by applicable law	i. To disclose information to governmental or regulatory authorities, or the courts, and with financial intermediaries relating to past or continuing transactions (such as a trust or an investment that has not matured). ii. For compliance functions, such as audit and reporting, managing risk, maintaining tax records, debt recovery, or responding to instructions from financial regulators or the Financial Ombudsman; for the investigation and prosecution of fraud, anti-money laundering (AML) and other forms of economic crime, and measures relating to international sanctions and combating terrorism. We may process information from you, and/or your current or former spouse or partner, and other persons living in your household. This purpose may also include providing data to law enforcement	Personal Identifiers Protected Personal Identifiers Family and related person details Business contact details Employment History Financial Details

	agencies under the UK-US Agreement to Access to Electronic Data for the Purpose of Countering Serious Crime, signed on 3 October 2019 iii. To retain telephone conversations and electronic communications with you that resulted in transactions, and to keep samples of your signature likeness and handwriting. iv. To process any historical claims in relation to PPI (Payment Protection Insurance).	
(c) Where necessary for Citi, a person associated with the Consumer Finance Products, or an identified third party's legitimate interests, including substantial public interests (as listed here)	i. To comply with transfer obligations with the financial institution who took over a divested product. ii. To analyse your former use of Citi services, for risk assessment and controls, statistical and trend analysis (system security), and IT administration, operation, testing and support. Wherever possible we minimise and aggregate any personal data, so that you are not identifiable. iii. To detect, investigate and prosecute fraud and other forms of crime and to assess past and current suspicious transactions and financial activities. iv. For compliance with duties under legislation applicable to Citi or to you, including the	Personal Identifiers Protected Personal Identifiers Family and related person details Business contact details Employment History Financial Details

	Common Reporting Standard (CRS), and, if you are a US person, the U.S. Foreign Account Tax Compliance Act (FATCA). v. To manage information security of our storage systems. vi. To disclose information and comply with instructions of governmental, tax or regulatory bodies, courts, and auditors in connection with any transactions, vii. To apply for protective orders or directions to courts supervising Citi as a Trustee, or to establish, exercise or defend legal claims or to assist our clients or others to do this. viii. To investigate and respond to complaints or incidents about our business, and to help maintain service quality and train staff dealing with complaints and disputes.	
(d) With your consent, where you instruct us to perform any new operations	i. Under your direction, to establish a relationship with another financial institution ii. Prior to making a distribution of funds from the issuer of an active investment, Citi may require that an interest holder provide authorisation. iii. For the executing payments from or into your accounts, trust funds or investments.	Personal Identifiers Protected Personal Identifiers Family and related person details Business contact details Financial Details Telecommunications and Electronic Communications Data.

5. Processing of personal information based on consent and the effects of its refusal, withdrawal, or revocation.

We do not process nor retain account or product information under the legal basis of consent.

If we ask for your consent for a new form of processing (for example to fulfil data rights, or to transfer your financial information) you may withhold or revoke your consent, using the contact details in Section 3. However, if you do not have your consent, or it is later withdrawn, we will be unable to perform instructions and functions that depend on it. Revoking your consent does not affect the validity or legality of any activities carried out prior to its withdrawal or revocation.

6. Processing of personal information pursuant to a statutory or contractual requirement, and consequences of not providing such Information

We do not collect or create information about you on the basis of statutory or contractual requirements. If we do so by virtue of a change in legislation, we will amend this notice to inform you.

7. Disclosures of personal information and International Data Transfers

We disclose your personal information, to the entities and for the purposes specified in the table below

Recipient/Affiliate	Country	Type/Purpose of Disclosure
Citibank N.A.	United States	Group oversight and processing support
Citibank UK Limited	United Kingdom	Operational Support, Legal Counsel, Independent Compliance and Audit
Citibank Europe, plc.	Ireland (main office) Poland (service centre)	Shared service operations
Citicorp Services India	India	Shared service operations
Equinity Ltd	United Kingdom	Technology Services
ITS Solutions	United Kingdom	Technology Services (data hosting)
Iron Mountain UK	United Kingdom	Paper data storage and file management

We may also disclose your personal information, as applicable:

- to the financial institution that acquired the Divested Product, and to Citi affiliates, for the purpose identified in this Privacy Notice.

- b. at the request of any financial institution, payment infrastructure provider, custodian, sub-custodian, fund houses, fund administrators or issuers of securities, to fulfill any maturing payment or repayment of a trust, loan or investment.
- c. to authorities in any competent jurisdiction including any government, judicial, or regulatory body for the following legitimate interests (including substantial public interests): (i) if false or inaccurate information was gathered, in case of a criminal or money laundering investigation, (ii) for or in connection with an examination of us by our parent bank or other examiners; (iii) pursuant to subpoena or other legal process; (iv) at the express direction of any other authorised government agency; (v) to our internal or external attorneys or auditors; and to others to whom the Data Controllers are required to make such disclosure by applicable law, including attorneys nominated to represent you under a Lasting Power of Attorney or by the Court of Protection under the Mental Capacity Act 2005.
- d. to any bank, financial institution, law firm or company that processes insurance or legal claims on your behalf, arising out of a Closed or Divested Consumer Finance Product, and to the Credit Management Companies you have given authority to.

Transfers of personal data between the UK and Jersey, and between these jurisdictions and the EU/EEA, rely on reciprocal recognition or 'Adequacy'. Where we transfer data for storage, or grant access for processing outside the UK and the EU/EEA, to countries that have not attained a formal Adequacy decision by the European Commission and the UK government, we put in place standard contractual clauses (SCCs) in the form set out in the European Commission Implementing Decision (EU)2021/914 with an UK Addendum, or rely on other valid data transfer mechanisms. We also conduct data transfer impact assessments and set up specific measures to cover any gaps the impact assessment they may highlight.

8. Where does Citi store your personal information?

We archive your personal and financial electronic records within the UK and the EU, within secured IT virtual servers or private cloud networks, and keep paper records in deep archive solutions subcontracted by Citi to IronMountain. Please note that only us, and the bank or financial institution that acquired our consumer finance business, and our respective financial regulators, have a legal right to access or audit personal or financial data.

Due to the nature of IT systems, our data processors store transient copies when we retrieve electronic records. These are subsequently deleted after customer data is processed. They do not retain copies of your information.

9. Data Storage and Retention Periods

Personal data processed in connection with a Closed or Divested Consumer Financial Product is stored for a retention period, the length of which is reasonably determined taking into consideration UK regulatory requirements. Most information will have been deleted after 10 years from the closure of your product, except for documents executed as deeds, or products that were closed due to account inactivity, in which case that term is 15 years. Individual transaction records had been retained for five (5) years after each transaction, and except for certain cases, including active PPI litigation, their data will have been disposed of.

10. What automated decision-making does Citi carry out?

There is no automated decision-making or profiling using your personal data that may result in legal, or substantially similar effects without human intervention.

Please note that we may use artificial intelligence tools to locate, classify and dispose of information that has reached the end of its retention period. Our use of artificial intelligence is always monitored and no decision-making in respect of consumer accounts is delegated to any AI system.

11. Your rights in relation to your personal information

11.1 You can ask us to: (a) provide a copy of your personal information; (b) correct errors or mistakes in your personal information; (c) erase your personal information after the data storage and retention periods described in this document; (d) transfer your personal information to other organisations; and (e) restrict processing of your personal information. These rights are limited by law, in particular as this privacy notice relates to the processing of historical data stored in 'vaults,' certain rights relating deletion or transfer to a designated person may be impossible or involve a disproportionate effort. Citi does not use or share any data relating to divested consumer finance businesses for marketing purposes.

11.2 If you wish to exercise your individual data rights, or if you have any queries about your personal information, please contact **Canada Square Operations Limited** using the contact details provided in Section 2.1 of this Privacy Notice.

11.3 If you believe your personal data was mishandled, or you have concerns regarding access to, or use of your information, you may contact our independent Data Protection Officer. Under the UK (Digital Use and Access) Act 2025, you have the right to raise a formal complaint.

Complaints may be submitted via email

GDPR Data Protection Officer
Citigroup
40 Bank Street, 9th Floor
London, E14 5NR
United Kingdom

Email: GDPRDPO@citi.com

11.4 Data Protection Authorities

EU/EEA Residents may also complain to the Data Protection Commissioner in Ireland (Citigroup's EU Lead Supervisory Authority) at www.dataprotection.ie or the data protection authorities of the EU/EEA Member State where they reside.

UK residents can contact the Information Commissioners Office (www.ico.org.uk)

Jersey residents can contact the office of the Jersey Data Protection Commissioner (<http://jerseyoic.org>)

Switzerland residents can contact the Federal Data Protection Commissioner (FDPIC) <https://www.edoeb.admin.ch>

Monaco residents may contact the Personal Data Protection Authority (<http://en.gouc.mc>)

12. Cookies and Online Identifiers

For information about Cookies and Online Identifiers, please refer to the Cookie Preferences section on our global Citigroup website. Canada Square Operations Ltd, the Data Controller, does not have separate websites.

13. Updates to this Privacy Notice

If we modify this Privacy Notice at any time we will place the modified versions on our Citigroup website at <https://www.citigroup.com/global/about-us/global-presence/united-kingdom>. Where such changes are substantial we may need to reach out to provide you with a copy to the last Email address we had from you.