



**Manual in terms of the Promotion
of Access to Information Act,
2000 and the Protection of
Personal Information Act, 2013**

of

**Citibank N. A.,
South Africa Branch**

Citibank N.A., South Africa Branch Manual

Date of compilation - 4 June 2018

Date of latest revision – 4 June 2018

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1. DEFINITIONS AND INTERPRETATION

Citibank SA means Citibank N.A., South Africa Branch, registration number 1995 / 007396 / 10;

Citigroup means Citigroup Inc., a corporation organized and existing under the laws of the State of Delaware, and its subsidiaries, but excluding Citibank SA;

Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPI and in paragraph 12.1 of this Manual;

Constitution means the Constitution of the Republic of South Africa, 1996;

Customer refers to any natural or juristic person that received or receives services from Citibank SA;

Data Subject has the meaning ascribed thereto in section 1 of POPI;

Information Officer means the duly authorised Head (as defined in section 1 of PAIA) of Citibank SA, being Lindsay Scholtz;

Manual means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPI Regulations;

PAIA means the Promotion of Access to Information Act 2 of 2000;

Personal Information has the meaning ascribed thereto in section 1 of POPI;

Personnel refers to any person who works for, or provides services to or on behalf of Citibank SA, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Citibank SA, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;

POPI means the Protection of Personal Information Act 4 of 2013;

POPI Regulations mean the regulations promulgated in terms of section 112(2) of POPI;

Private Body has the meaning ascribed thereto in sections 1 of both PAIA and POPI;

Processing has the meaning ascribed thereto in section 1 of POPI;

Responsible Party has the meaning ascribed thereto in section 1 of POPI;

Record has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;

Requestor has the meaning ascribed thereto in section 1 of PAIA;

Request for Access has the meaning ascribed thereto in section 1 of PAIA; and

SAHRC means the South African Human Rights Commission.

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPI and PAIA as the context specifically requires, unless otherwise defined herein.

2. INTRODUCTION

2.1 General

Citibank, N.A, South African branch operates as the local branch of a foreign bank, duly authorised by the South African Reserve Bank, and registered as an external company in terms of the Companies Act 71 of 2008.

Citibank SA is also a Private Body for the purposes of POPI and PAIA and accordingly has produced this Manual in compliance of both POPI and PAIA.

2.2 PAIA

PAIA was assented to on 2 February 2000 and commenced on 9 March 2001. The fundamental purpose of PAIA is to give effect to section 32 of the Constitution, being the constitutional right of access to any information held by the State or by another person and that is required for the exercise or protection of any rights.

Where a Request for Access is made in terms of section 50 of PAIA, the Private Body to which the request is made is obliged to release the Record, except where PAIA expressly provides that the Record may or must be withheld. PAIA sets out the requisite procedures to be followed by a Requester when making a Request for Access.

2.3 POPI

POPI was assented to on 26 November 2013. Broadly, the purpose of POPI is to give effect to section 14 of the Constitution, being the constitutional right to privacy by protecting Personal Information and regulating the free flow and Processing of Personal Information.

POPI sets minimum conditions which all Responsible Parties must comply with so as to ensure that Personal Information is respected and protected. These minimum conditions are the Conditions for Lawful Processing and are more fully described in paragraph 12.1 of this Manual.

2.4 Purpose of the Manual

The purpose of this Manual is to foster a culture of transparency and accountability within the financial services industry of which Citibank SA forms a part. Furthermore, its purpose is to give effect to both the constitutional right of access to information, where that information is required for the exercise or protection of a right, and the right to privacy in relation to the protection of Personal Information.

Both PAIA and POPI recognise that the rights to access of information and privacy respectively may be limited in accordance with section 36 of the

Constitution to the extent that such limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom.

This Manual:

- a) For the purposes of PAIA, details the procedure to be followed by a Requestor and the manner in which a Request for Access shall be facilitated; and
- b) For the purposes of POPI, amongst other things, details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom Citibank SA Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients to whom Personal Information may be supplied.

3. CITIBANK SA CONTACT DETAILS

3.1 Contact details of the Information Officer of Citibank SA:

- a) **Name of Information Officer:**

Lindsay Scholtz

- b) **Postal address:**

P O Box 1800
Saxonwold
2132
South Africa

- c) **Physical address:**

145 West Street
Sandown
Sandton
2196

- d) **E-mail address:**

Informationofficerza@citi.com

3.2 General contact details of Citibank SA:

e) Postal address:

P O Box 1800
Saxonwold
2132
South Africa

f) Physical address:

145 West Street
Sandown
Sandton
2196

g) Telephone number:

(+27)(11) 944-1000

h) Facsimile number:

(+27)(11) 944-0856

i) Internet site address:

<http://www.citi.com/southafrica/homepage/>

4. THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

4.1 Introduction:

The SAHRC has published a guide pursuant to section 10 of PAIA (the **SAHRC Guide**). The SAHRC Guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA. Any enquiries regarding the SAHRC Guide should be directed to the SAHRC PAIA unit.

4.2 Contact details of the SAHRC PAIA unit:

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a) Postal address:

Private Bag X2700
HOUGHTON
2041

b) Telephone number:

(+27)(11) 877 3803

c) Facsimile number:

(+27)(11) 403 0625

d) Website address:

<http://www.sahrc.org.za>

e) E-mail address:

section51.paia@sahrc.org.za

5. PUBLICATION AND AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

5.1 Schedule of Records

The Schedule of Records as contained in Appendix 4 of this Manual details the Records that are held and/or Processed by Citibank SA for the purposes of PAIA and POPI respectively. Such Records are categorised as set out in Appendix 4 which details whether access to such Records is automatically available or whether the said Record must be accessed in accordance with PAIA. Access to such Records may not be granted if they are subject to the grounds of refusal which are specified in paragraph 6 below.

5.2 List of applicable legislation

The list of legislation in terms of which Citibank SA holds/Processes Records and that is applicable to Citibank SA is set out in Appendix 3.

6. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

The following are the grounds on which Citibank SA may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA:

- 6.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- 6.2 Mandatory protection of the commercial information of a third party, if the Records contain:
 - a) Trade secrets of that third party;
 - b) Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - c) Information disclosed in confidence by a third party to Citibank SA, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 6.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 6.4 Mandatory protection of the safety of individuals and the protection of property;
- 6.5 Mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 6.6 Protection of the commercial information of Citibank SA, which may include:

- a) Trade secrets;
- b) Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Citibank SA;
- c) Information which, if disclosed, could put Citibank SA at a disadvantage in contractual or other negotiations or prejudice Citibank SA in commercial competition; and/or
- d) Computer programs which are owned by Citibank SA, and which are protected by copyright and intellectual property laws;

6.7 Research information of Citibank SA or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and

6.8 Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

7. REMEDIES AVAILABLE TO THE REQUESTER UPON REFUSAL OF A REQUEST FOR ACCESS IN TERMS OF PAIA

7.1 Internal remedies

Citibank SA does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

7.2 External remedies

In accordance with sections 56(3) (c) and 78 of PAIA, a Requestor may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

8. PROCEDURE FOR A REQUEST FOR ACCESS IN TERMS OF PAIA

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- 8.1 A Requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record.
- 8.2 A Requester must complete the prescribed Request for Access form attached as Appendix 1, and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in paragraph 3.1 or 3.2 above.
- 8.3 The Request for Access form must be completed with enough particularity to at least enable the Information Officer to identify the following:
 - a) The Record/s requested;
 - b) The identity of the Requester;
 - c) The form of access that is required, if the request is granted;
 - d) The postal address or fax number of the Requester; and
 - e) The right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 8.4 Citibank SA will process the Request for Access within 30 days of receipt of the Request for Access, unless the Request for Access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of PAIA.
- 8.5 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requestor must state the manner and the particulars so required.
- 8.6 If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer.

- 8.7 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 8.8 Citibank SA will voluntarily provide the requested Records to a Personal Requestor (as defined in section 1 of PAIA). The prescribed fee for reproduction of the Record requested by a Personal Requestor will be charged in accordance with section 54(6) of PAIA and paragraph 9 below.

9. FEES

9.1 The Act provides for two types of fees, namely:

- a) A request fee, payable by a Requestor, other than a Personal Requestor; and
- b) An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postage costs.

- 9.2 When the Request for Access is received by the Information Officer, the Information Officer shall by notice require the Requester, other than a Personal Requester, to pay the prescribed request fee (if any), before further processing of the Request for Access.
- 9.3 If the search for a Record requires more than the prescribed hours for this purpose, the Information Officer shall notify the Requester to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.
- 9.4 The Information Officer shall withhold a Record until the Requester has paid the fees set out in Appendix 2.
- 9.5 A Requester whose Request for Access to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure including making arrangements to make it

available in a requested form provided for in section 29(2) (a) and (b)(i) and (ii) of PAIA.

9.6 If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer must repay the deposit to the Requester.

10. DECISION TO GRANT ACCESS TO RECORDS

10.1 Citibank SA shall decide whether to grant or decline the Request for Access within 30 days of receipt of the Request for Access and must give notice to the Requestor with reasons (if required) to that effect.

10.2 The period referred to in paragraph 10.1 above may be extended for a further period of not more than 30 days if the Request for Access is for a large number of Records or the Request for Access requires a search for Records held at another office of Citigroup and the Records cannot reasonably be obtained within the original 30 day period.

10.3 Citibank SA will notify the Requester in writing should an extension of time as contemplated in paragraph 10.2 above be required.

11. AVAILABILITY OF THE MANUAL

11.1 This Manual is made available in terms of Regulation R.187 of 15 February 2002 to PAIA and section 4 of the Regulations to POPI.

11.2 This Manual is also available on the website of Citigroup, being:
<http://www.citi.com/southafrica/homepage/>

11.3 This Manual is further available at the SAHRC and at the offices of Citibank SA for inspection during normal business hours and shall be published in English in the *Government Gazette*.

11.4 Copies of the Manual can be obtained from the Information Officer

12. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY CITIBANK SA

12.1 Conditions for Lawful Processing

Chapter 3 of POPI provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPI. Below is a description of the eight Conditions for Lawful Processing as contained in POPI:

- a) Accountability - the Responsible Party has an obligation to ensure that there is compliance with POPI in respect of the Processing of Personal Information.
- b) Processing limitation - Personal Information must be collected directly from a Data Subject to the extent applicable; must only be processed with the consent of the Data Subject and must only be used for the purposes for which it was obtained.
- c) Purpose specification - Personal Information must only be processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.
- d) Further processing limitation - further processing of Personal Information must be compatible with the initial purpose for which the information was collected.
- e) Information quality - the Responsible Party must ensure that Personal Information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures.
- f) Openness - there must be transparency between the Data Subject and the Responsible Party.

- g) Security safeguards - a Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being processed responsibly and is not unlawfully accessed.
- h) Data Subject participation - the Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing.

12.2 Purpose of the Processing of Personal Information by Citibank SA

As outlined in paragraph 12.1c), Personal Information may only be Processed for a specific purpose. The purposes for which Citibank Processes or will Process Personal Information is set out in Part 1 of Appendix 5.

12.3 Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPI, a Data Subject may either be a natural or a juristic person. Part 2 of Appendix 5 sets out the various categories of Data Subjects that Citibank SA Processes Personal Information on and the types of Personal Information relating thereto.

12.4 Recipients of Personal Information

Part 3 of Appendix 5 outlines the recipients to whom Citibank SA may provide a Data Subjects Personal Information to.

12.5 Cross-border flows of Personal Information

Section 72 of POPI provides that Personal Information may only be transferred out of the Republic of South Africa:

- a) If the recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPI; or

- b) If the Data Subject consents to the transfer of their Personal Information; or
- c) If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d) If the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- e) If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

Part 4 of Appendix 5 sets out the planned cross-border transfers of Personal Information and the condition from above that applies thereto.

12.6 Description of information security measures to be implemented by Citibank SA

Part 5 of Appendix 5 sets out the types of security measures to implemented by Citibank SA in order to ensure that Personal Information is respected and protected.

A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Citibank SA may be conducted in order to ensure that the Personal Information that is processed by Citibank SA is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

12.7 Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPI and regulation 2 of the POPI Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as Appendix 6 subject to exceptions contained in POPI.

12.8 Request for correction or deletion of Personal Information

Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Appendix 7 to this Manual.

APPENDIX 1

REQUEST FOR ACCESS TO A RECORD IN RELATION TO PAIA

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53 (1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- (a) *The particulars of the person who requests access to the record must be given below.*
- (b) *The address and/or fax number in the Republic to which the information is to be sent must be given.*
- (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:

Identity number:

Postal address:

Telephone number:

Fax number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record

(a)

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

(b)

*If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record

:

E. Fees

(a)

*A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.*

(b)

You will be notified of the amount required to be paid as the request fee.

(c)

*The **fee payable for access** to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*

(d)

If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:

Form in which record is required:

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Mark the appropriate box with an X.

NOTES:

(a)

Compliance with your request in the specified form may depend on the form in which the record is available.

(b)

Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c)

The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:			
copy of record*		inspection of record	
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
view the images	copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)	
4. If record is held on computer or in an electronic or machine-readable form:			
printed copy of record*	printed copy of information derived from the record*	copy in computer readable form* (stiffy or compact disc)	
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES
			NO

G. Particulars of right to be exercised or protected

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*If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

1. Indicate which right is to be exercised or protected:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at this day of
20

**SIGNATURE OF REQUESTER/PERSON
ON WHOSE BEHALF REQUEST IS MADE**

APPENDIX 2

APPLICABLE FEES IN RESPECT OF PRIVATE BODIES IN RELATION TO PAIA

FEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9 (2) (c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11 (1) are as follows:

	R
(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on— i. stiffy disc	R7,50
ii. compact disc	R70,00
(d)) i. For a transcription of visual images, for an A4-size page or part thereof	40,00
ii. For a copy of visual images	R60,00
(e) i. For a transcription of an audio record, for an A4-size page or part thereof	R20,00
ii. For a copy of an audio record	R30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11 (3) are as follows:

	R
(1) (a) For every photocopy of an A4-size page or part thereof	R1,10
(b)	R0,75

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For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	
(c) For a copy in a computer-readable form on—	
i. stiffy disc	R7,50
ii. compact disc	R70,00
(d)	
i. For a transcription of visual images, for an A4-size page or part thereof	R40,00
ii. For a copy of visual images	R60,00
(e)	
i. For a transcription of an audio record, for an A4-size page or part thereof	R20,00
ii. For a copy of an audio record	R30,00
(f)	
To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
(2)	
For purposes of section 54 (2) of the Act, the following applies:	
(a)	
Six hours as the hours to be exceeded before a deposit is payable; and	
(b)	
one third of the access fee is payable as a deposit by the requester.	
(3)	
The actual postage is payable when a copy of a record must be posted to a requester.	

APPENDIX 3

LIST OF APPLICABLE LEGISLATION IN RESPECT OF CITIBANK SA

1. Banks Act No. 94 of 1990
2. Basic Conditions of Employment Act No. 75 of 1997
3. Companies Act No. 71 of 2008
4. Competition Act No. 89 of 1998
5. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
6. Constitution of South Africa, 1996
7. Customs and Excise Act No 91 of 1964
8. Electronic Communications and Transactions Act No. 25 of 2002
9. Employment Equity Act No. 55 of 1998
10. Financial Advisory and Intermediary Services Act No.37 of 2002
11. Financial Intelligence Centre Act No. 38 of 2001
12. Financial Markets Act No. 19 of 2012
13. Financial Sector Regulation Act No. 9 of 2017
14. Immigration Act No. 13 of 2002
15. Income Tax Act No. 58 of 1962
16. Insolvency Act No. 24 of 1936
17. Inspection of Financial Institutions Act No.80 of 1998
18. Labour Relations Act No. 66 of 1995

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19. National Credit Act No. 34 of 2005
20. National Payment System Act No. 78 of 1998
21. Occupational Health and Safety Act No. 85 of 1993
22. Prevention of Organised Crime Act No. 121 of 1998
23. Promotion of Access to Information Act No. 2 of 2000
24. Protection of Personal Information Act No. 4 of 2013
25. Protected Disclosures Act No. 26 of 2000
26. Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004
27. Securities Transfer Tax Act No.25 of 2007
28. Skills Development Levies Act No.9 of 1999
29. Unemployment Insurance Contributions Act No. 4 of 2002
30. Value-added Tax Act No. 89 of 1991

APPENDIX 4

SCHEDULE OF RECORDS OF CITIBANK SA IN RELATION TO PAIA

Category	Subject of Record	Availability
Personnel	Personal records provided by Personnel	On request in terms of PAIA
	Records provided by a third party relating to Personnel	On request in terms of PAIA
	Conditions of employment and other Personnel-related contractual and quasi-legal records	On request in terms of PAIA
	Internal evaluation records and other internal records	On request in terms of PAIA
	Correspondence relating to Personnel	On request in terms of PAIA
	Training schedules and material	On request in terms of PAIA
Customer-related	Records provided by a Customer to a third party acting for, or on behalf of Citibank SA	On request in terms of PAIA
	Records provided by a third party to Citibank SA	On request in terms of PAIA
	Records generated by, or within Citibank SA relating to its Customers, including transactional Records	On request in terms of PAIA

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	Records provided by a Customer to Citibank SA	On request in terms of PAIA
Citibank SA¹	Operational records	On request in terms of PAIA
	Databases	On request in terms of PAIA
	Information technology	On request in terms of PAIA
	Marketing records	On request in terms of PAIA
	Internal correspondence	On request in terms of PAIA
	Product records	On request in terms of PAIA
	Statutory records	On request in terms of PAIA
	Internal policies and procedures	On request in terms of PAIA
	Treasury-related records	On request in terms of PAIA
	Securities and equities	On request in terms of PAIA
	Records held by officials of Citigroup	On request in terms of PAIA
Other party	Personnel, Customer or Citibank SA Records which are held by another party	On request in terms of PAIA
	Records held by Citibank SA pertaining to other parties, including without limitation, financial Records, correspondence, contractual	On request in terms of PAIA

1 These Records include, but are not limited to, the Records, which pertain to Citibank SA's own affairs.

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	Records, Records provided by other parties, and Records that third parties have provided which relate to contractors and suppliers.	
	Citibank SA may possess Records, pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess Records that can be said to belong to Citibank SA.	On request in terms of PAIA

APPENDIX 5

PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPI

Part 1	Purpose of the Processing of Personal Information	Type of Processing
	<p>(A) to provide accounts and services to the Customer in accordance with terms agreed to by the Customer; (B) to undertake activities related to the provision of accounts, services and trade transactions, such as, by way of non-exhaustive example:</p> <p>(1) to fulfil foreign and domestic legal, regulatory and compliance requirements (including US anti-money laundering obligations applicable to Citigroup) and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to any of the Citibank SA, Citibank SA affiliates and their agents or payment infrastructure providers; (2) to verify the identity of Customer representatives who contact the Bank or may be contacted by Citibank SA; (3) for risk assessment, information security management, statistical, trend analysis and planning purposes; (4) to monitor and record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes; (5) for crime detection, prevention, investigation and prosecution; (6) to enforce or defend the Citibank SA's or Citibank SA affiliates' rights; and (7) to manage the Citibank SA's relationship with the Customer, which may include providing information to Customer and Customer affiliates about Citibank SA's and Citibank SA affiliates' products and services; and (C) the purposes related to any</p>	Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,

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	authorised disclosure made in terms of agreement, law or regulation; (D) any additional purposes expressly authorised by the Customer; and (E) any additional purposes as may be notified to the Customer or Data Subjects in any notice provided by Citibank SA	
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Part 2	Categories of Data Subjects of Citibank SA and categories of Personal Information relating thereto	Data Subject	Personal Information Processed
	<ul style="list-style-type: none">• Customer:<ul style="list-style-type: none">○ Corporate; Customer Profile information including, account details, payment information, corporate structure, customer risk rating and other customer information including to the extent the categories of information relate to individuals or representatives of customers (e.g., shareholders, directors, etc.) required for the above mentioned purposes○ Individual; Name; contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory	<ul style="list-style-type: none">• Natural Persons;• Juristic Persons.	Personal data relating to a Data Subject received by or on behalf of Citibank SA from the Customer, Customer affiliates and their respective representatives and related parties in the course of providing accounts and services to the

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	<p>identifiers (e.g. tax identification number, Alien Registration Number); Account information (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; “know-your customer” data, account opening forms; photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of customer signatures).</p> <ul style="list-style-type: none">○ Cardholders, Corporate Customers’ Directors, officials and staff: Name, contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); systems access permissions; “know-your customer” data (Date Of Birth, Gender, Citizenship Status Or Nationality, Place Of Birth), account opening forms (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type), other identification and verification data as contained in images of ID card, passport and/or Visa Number and other documents (Birth	<p>Customer or in connection with a transaction or services.</p> <p>Customer personal data may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, voiceprints, bank account and transactional information (where legally permissible), to the extent that these amount to personal data under POPI.</p>
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	<p>Certificate Number); images of customer signatures, voiceprints.</p> <ul style="list-style-type: none">○ Cardholders: Name, contact details(address/telephone number/email address), date of birth, regulatory identifiers (e.g. tax identification number), account information (account number, account balance), transaction details and branch details, “know-your-customer” data, account opening forms, photographs, other identification and verification data as contained in images of ID card, passport and other ID documents, images of customer signatures.○ Payment beneficiaries: Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type; beneficiary address, transaction details; payment narrative and, for certain data transferred from the UK only, National Insurance numbers.○ Staff : Name; Citi Global employee ID number; business contact details (address/telephone number/email address)		
Part 3	<p>Recipients of Personal Information</p>		
	<p>Citibank SA, its affiliates and their respective representatives</p>		

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Part 4	When making authorized disclosures or transfers of personal information in terms of section 72 of POPI , Personal Data may be disclosed to recipients located in countries which do not offer a level of protection for those data as high as the level of protection as South Africa.
Part 5	<p style="text-align: center;">Description of information security measures to be implemented by Citibank SA</p> <p>Citibank SA undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined in numbers 1 to 8. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Citibank SA may use different otherwise-suitable measures and adapt to technological security development, as needed, provided that the level of data protection achieved for each objective meets Citi Information Security Standards (CISS) as updated from time to time.</p> <ol style="list-style-type: none">1. Access Control of Persons Citibank SA shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.2. Data Media Control Citibank SA undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Citibank SA and containing personal data of Customers.3. Data Memory Control Citibank SA undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration or deletion of stored data of the Data Exporter's customers.4. User Control Citibank SA shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.5. Access Control to Data

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Citibank SA represents that the persons entitled to use Citibank SA's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorization).

6. Transmission Control

Citibank SA shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of Citibank SA's data communication equipment / devices.

7. Transport Control

Citibank SA shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8. Organization Control

Citibank SA shall maintain its internal organization in a manner that meets the requirements of this Manual.

APPENDIX 6

FORM FOR THE OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPI

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

A DETAILS OF DATA SUBJECT	
Name and surname of data subject:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
B DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party(<i>if the responsible party is a natural</i>):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	

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Signed at this day of 20

Signature of data subject (applicant)

APPENDIX 7

FORM FOR THE REQUEST TO DELETE OR CORRECT PERSONAL INFORMATION IN TERMS OF POPI

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017 [Regulation 3(2)]

Note:

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number

Mark the appropriate box with an "x".

Request for:

Reference Number....

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

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B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party(<i>if the responsible party is a natural person</i>):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body (<i>if the responsible party is not a natural person</i>):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)

* Delete whichever is not applicable

Signed at this day of 20

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.....
Signature of Data subject