

# Kenya Specific Recruitment Data Privacy Notice

## 1. Introduction

If you are applying for a role located in Kenya, this Privacy Notice sets out further information that is relevant to how Citi collects, uses, and otherwise processes personal information about you in connection with its recruitment processes in accordance with Kenya's Data Protection Act, 2019 (the "DPA"). This Privacy Notice is supplemental to and should be read together with the [Global Privacy Policy](#).

For the purposes of this Privacy Notice, references to "we", "Citi", "us" or "our" are references to entities within our Group now and in the future.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment and those who participate in our recruiting programs and events. This personal data is submitted directly to Citi through the Citi's Careers Site (the "Site") and follow-up communications and/or through alternative channels (e.g., via professional recruiting firms).

It is important that you read this Privacy Notice together with any other privacy policy or notice that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data and the rights you have in relation to such data.

This Privacy Notice does not form part of any contract. It may be amended or withdrawn at any time.

## 2. Legal basis for processing your personal data

We will collect, use, store, share or otherwise process your personal data where we are satisfied that one or more of the following legal bases apply:-

- (a) The processing is necessary for the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or rights and freedoms which require protection of personal data. We consider that we have legitimate interests in processing your personal data for the purposes set out in the [Global Privacy Policy](#) such as evaluating your job application; to manage our relationship with you; to ensure that we recruit and retain a workforce with the skills and experience required; to evaluate and maintain efficacy of our recruiting process more generally; to operate our business and to protect our business and its employees, clients and third parties; and, to support the achievement of our immediate and long-term business goals and outcomes.
- (b) The processing is necessary for performing our contractual and precontractual measures relating to our potential employment relationship with you.
- (c) The processing is necessary for compliance with our legal and regulatory obligations to which we are subject, including with regard to public health and workplace safety.

## 3. If you fail to provide personal data

If you fail to provide the personal data that we request for, we may not be able to process your job application or we may be prevented from complying with our legal and regulatory obligations.

## 4. How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **5. What data protection rights do you have?**

You have the following rights in relation to the personal data that we hold concerning you:

- a) to request access to your personal data and receive a copy of such personal data.
- b) to request correction and erasure of your personal data.
- c) to request the restriction of processing of your personal data.
- d) to request us to transfer your personal data either to you or to another person in a commonly used electronic format.
- e) to object to the processing of your personal data.
- f) to request not to be subject to automated decision making.

Please note that you may log onto the Site using the details previously provided to you at any time and access your personal data stored in the Site. You can also log onto the Site to update or correct the personal data that Citi holds about you. You do not need our permission and you can do this at any time.

However, if you wish to contact us about exercising your rights including the deletion of your profile, please submit your request to [hrssemeaprivacyact@citi.com](mailto:hrssemeaprivacyact@citi.com).

## **6. Changes to this Privacy Notice**

This Privacy Notice was last updated on September 26, 2022. We reserve the right to update this Privacy Notice at any time but if we do so, we will post any changes to this Privacy Notice on this page. Please check this page regularly to keep up-to-date with the contents of this Privacy Notice.

## **7. How to contact us**

If you have any concerns about the use of your personal data, questions about this Privacy Notice including any requests to exercise your legal rights under the law, please contact our DPO using the details set out below

Email address: [yvonne.n.muturi@citi.com](mailto:yvonne.n.muturi@citi.com)

Postal address: P.O. Box 30711 - 00100 Nairobi

Physical address: Citibank House, Upper Hill, Nairobi, Kenya

Telephone number: +254-20-2754091

It is important that the personal data we hold about you is accurate and the most recent. We encourage you to keep us informed in case of any changes in your personal data during your relationship with us.