



Hong Kong Personal Data Privacy

It is the policy of the Company to ensure that all reasonable and practicable steps are taken to comply with the Personal Data (Privacy) Ordinance (the “Ordinance”), and/or any other laws (within or outside the Hong Kong Special Administrative Region) applicable to Citi’s process and/or use of your personal data (“Applicable Laws”), to safeguard your privacy with respect to your personal data.

It is necessary for you to supply your personal data to the Company in connection with your application for employment in order for us to process your employment applications. We may need to collect more information about you from you or from public sources and/or other third parties during your employment with the Company. The type of information which may be collected includes (but is not limited to):

- Recruitment, engagement or training records;
- Information about your medical condition;
- Information regarding termination of employment;
- Terms and conditions of employment;
- Personal and emergency contact details;
- Performance, conversations, conduct and disciplinary records;
- Remuneration details, bonus and share plan information and other benefits;
- Membership of professional associations or trade unions;
- Leave records (including annual leave, sick leave and maternity leave);
- Taxation, banking and mandatory provident fund details;
- Health and safety information;
- Information about your position as, and relationship or other connection with, any relevant senior official within a government entity or a commercial business organization (as applicable); and
- Any other information that you provide to the Company and its affiliates and Related Company.

Your personal data will be used relating to matters such as:

- processing employment applications;
- reviewing salaries, bonuses and other benefits;
- consideration for promotion, training, secondment, transfer, relocation or termination of employment;
- consideration of eligibility for staff loans;
- providing references;
- statistics and surveys;
- internal or external audit, investigation and surveillance;
- financial audits;
- announcement of appointment as the Company or any of its affiliates or Related Company shall think fit;
- compliance with the foreign and domestic legal, regulatory and compliance requirements and any requirements pursuant to legal process applicable to the Company or any of its affiliates



or Related Company (including without limitation any group-wide programs, policies, procedures, measures or arrangements for the maintenance, usage and disclosure of records and information that are or may be relevant to any actual or potential litigation, legal proceedings or regulatory enquiry, investigation, examination or enforcement proceedings), or any other foreign or domestic legal and/or regulatory obligation or request, or guidelines or guidance given or issued by any foreign or domestic legal, regulatory, governmental, tax, law enforcement or any other authority, or agreement / treaty entered into with any such authority or between or among any two or more such authorities, including disclosure to courts, tribunals and/or any such authority;

- conducting credit checks and ensuring ongoing credit worthiness (including without limitation for credit, risk and statistical analyses) by the Company or any of its affiliates or Related Company, carrying out matching procedures;
- consideration provision (including without limitation assessing and processing your application) and maintenance of the services or products applied for by or provided to you by the Company or any of its affiliates or Related Company;
- maintenance of the daily operation of the services or products provided to you by the Company or any of its affiliates or Related Company;
- promoting and providing services made available by the Company or any of its affiliates or Related Company;
- any other lawful purposes which are related to your employment of the Company; and
- any other lawful purposes which are related to any of the aforesaid purposes.

Data held by the Company about you will be kept confidential, but subject to your separate consent (if and insofar as required by Applicable Laws), the Company may provide such information to:

- the staff member(s) /employee(s) of the Company or any of its affiliates or Related Company or such outside organization, agent, contractor or third party service provider as authorized or engaged by the Company from time to time to process personal data of the Company's employees;
- internal or external auditors, internal or external consultants/investigators or internal or external legal adviser of the Company, within as well as outside Hong Kong or Macau SAR as considered appropriate;
- any party giving or proposing to give a guarantee or third party security to guarantee or secure your obligations;
- any agent, contractor, or third party service provider who provides administrative, telecommunications, computer or other services to the Company in connection with the operation of its business;
- any other branch/office of the Company;
- any other person under a duty of confidentiality to the Company including those under common control with the Company and its affiliates which has undertaken to keep such information confidential;
- outside parties involved in a merger, acquisition or due diligence exercise;
- medical practitioners appointed by the Company or any of its affiliates or Related Company;
- administrator of the Company's mandatory provident fund scheme;
- any foreign or domestic legal, regulatory, governmental, tax, law enforcement or any other authority or any other person or entity to whom the Company or any of its affiliates is under an obligation or otherwise required to make disclosure under the requirements as specified in the relevant paragraph above;
- any credit providers, financial institution, charge or credit card issuing companies, credit



reference agencies (including the operator of any centralized database used by credit reference agencies), collection agencies, agents, service providers or contractors or merchants;

- companies the Company engages to perform the functions listed above on the Company's behalf;
- any other person who has established or proposes to establish any business relationship with the Company or any of its affiliates or recipient of such data, for any of the purposes mentioned above;
- anyone you authorize (including without limitation any third party service providers with whom you have chosen to interact with in connection with your application for products and services of the Company or any of its affiliates or Related Company); and
- any person authorized by the Company, or any of its affiliates or Related Company.

* "Related Company" is defined as - in relation to the Company, any company that is the Company's subsidiary or holding company or a subsidiary of the Company's holding company. A subsidiary and a holding company shall be construed within the meaning of Sections 13-15 of the Companies Ordinance (Cap. 622).

The Company (by itself or through its affiliates) maintains computer systems in data centers and at other locations in the United States of America and in various countries throughout the world and that the Company may collect, store, process, disseminate or use your personal data in manner that causes it to be transferred or accessed from computer systems owned or operated by or on behalf of the Company throughout its global computer network.

If and insofar as required by Applicable Laws, the Company will obtain your separate consent in relation to international transfers.

If and to the extent required by Applicable Laws, the Company will, prior to sharing of your personal data with third parties, notify you of the name and contact details of the recipients, the purposes and means of processing and provision of your personal data, and the types of personal data to be provided and shared, and obtain your separate consent to the sharing of your personal data. The foregoing data recipients will use the personal data to the extent necessary for the specific purposes set out in this privacy policy and store the personal data for the minimum length of time required to fulfil the purposes, or insofar as required by Applicable Laws, in accordance with Applicable Laws.

Some of the data collected by the Company may constitute sensitive personal data under Applicable Laws. If and insofar as required by Applicable Laws, the Company will only process sensitive personal data if strict protection measures are put in place and there is sufficient necessity to justify the processing. If and insofar as required by Applicable Laws, such sensitive personal data will be processed with your separate consent.

If you do not provide complete and accurate personal data to the Company as and when it is required, there may be potentially serious consequences for you and, depending on the circumstances, your future employment relationship with the Company.

It is the Company's policy to retain certain personal data of employees when they cease to be employed. This data may be required for any residual employment-related activities, including for example, provision of references, processing of applications for re-employment, matters relating to retirement benefits and allowing the Company to fulfill any of the Company's contractual or statutory obligations.



You have the right to:

- ascertain whether the Company holds personal data in relation to you;
- request access to and correction of your personal data in accordance with the Ordinance and/or Applicable Laws at a fee which is not excessive;
- request the Company to inform you of the items of data which are routinely disclosed to credit reference agency(ies) and in the event of default to debt collection agency(ies); and to provide you with further information to enable the making of an access and correction request to the relevant credit reference agency(ies) or debt collection agency(ies);
- request the correction of your personal data; and
- be given reasons if a request for access or correction is refused, and object to any such refusal.

If and insofar as required by Applicable Laws, you have the right:

- (a) to request the Company to delete your personal data;
- (b) to object to certain uses of your personal data;
- (c) to request an explanation of the rules governing the processing of your personal data;
- (d) to ask that the Company transfer personal data that you have provided to the Company to a third party of your choice under circumstances as provided under Applicable Laws;
- (e) to withdraw any consent for the collection, processing or transfer of your personal data (you should note that withdrawal of your consent may result in the Company being unable to consider your subsequent promotion / transfer / relocation, or provide or maintain the services or products applied for by or provided to you); and
- (f) to have decisions arising from automated decision making (“ADM”) processes explained and to refuse to such decisions being made solely by ADM.

Nothing in this privacy policy shall limit your rights under the Ordinance and/or Applicable Laws.

If you have any requests for access to or correction of data, or information regarding policies and practices on data privacy, please open a case at HR Help Center or address to

***HR Shared Services Officer – Data Privacy,
Citibank, N.A., 12/F, Citi Tower, One Bay East,
83 Hoi Bun Road, Kwun Tong,
Kowloon***

For accessing or correcting your data, please use the Data Access/Correction Request Form obtainable from the Office of the Privacy Commissioner.