



PHILIPPINES DATA PRIVACY STATEMENT

REISSUED: 31 OCTOBER 2024

VERSION: 1.1



REMINDER TO ALL APPLICANTS FOR EMPLOYMENT

The Citi Workday recruitment portal (“Portal”) collects only personal data that is required to initially evaluate and process your job application. The Portal includes all the mandatory fields, and you are not obliged to provide other personal data not marked as mandatory on the Portal. While you are given the option to attach a resume file on-line, please carefully review the file before uploading, and refrain from providing any personal information that is not required, such as religion, political or social affiliations, health history, and personal beliefs. Citi values your privacy, and processes all information submitted for actual or potential employment in accordance with the Citi Philippines Human Resources Data Statement. Any questions or requests, including to avail of any privacy rights granted to you by law, should be addressed to the contacts indicated in the [Citi Philippines Human Resources Data Statement](#) below.

HUMAN RESOURCES DATA STATEMENT

This Human Resources Data Statement (the “HR Data Statement”) applies to the Personal Data of (A) all natural persons who have applied or apply for any type of employment with: (i) Citibank, N.A., Philippines Branch, (ii) Citibank N.A. – Regional Operating Headquarters ; (iii) Citigroup Business Process Solutions Pte. Ltd., Philippine Branch, or (iv) any other entity directly or indirectly owned or controlled by Citigroup Inc. in the Philippines (collectively, “Citi”), regardless of whether the application was accepted or not; (B) current Citi employees; and (C) former Citi employees (the “Data Subject”).

This HR Data Statement has been prepared by Citi in connection with the Philippines Data Privacy Law of 2012 and its implementing rules and regulations (the “DPA”). Capitalized terms used herein and not otherwise defined shall have the meanings set forth in the DPA.

1. Citi undertakes processing, profiling and sharing of Personal Data of Data Subjects in connection with its hiring requirements, the implementation or administration of employment programs, the application and execution of Citi policies, and the creation, maintenance and monitoring of employee accounts or relationships, including provision of credit, banking, brokering or other services, as applicable, as further described in the Permitted Purposes below.
2. You represent that where you or your representatives provide any Personal Data relating to any Relevant Individual (as defined below) to Citi, that you have informed each Relevant Individual and such Relevant Individual has given consent to, Citi’s processing, profiling and sharing of the Personal Data as described in this HR Data Statement.
3. Citi may process, profile and share Personal Data of the Data Subjects and Relevant Individuals in and to the United States, Singapore, Hong Kong, and any country/jurisdiction as Citi considers appropriate or necessary in connection with the processing of Personal Data as described herein. Such Personal Data may also be processed, profiled and shared in accordance with the laws, rules and regulations (including any regulatory requests, governmental acts and orders) in such country/jurisdiction.
4. Citi uses automated processing, including artificial intelligence (AI), for its legitimate business interests, to identify and align the applicant’s skills and abilities with a job opening. Additionally, if you provide consent, Citi can match your skills



and abilities to suitable roles at Citi. We may also extract information from your application to prevent biases in our AI and to train, test or validate the accuracy and quality of AI tools, under strict confidentiality and with appropriate protections for your personal data. Citi must underscore that all its hiring processes and decisions, including determining your suitability for a role, are conducted, checked, and decided by individuals. Citi's automated processing and AI do not involve relying on automatic or autonomous decision-making.

5. The retention, processing, profiling and sharing of Personal Data will occur during the employment application and evaluation stages, as well as for the duration of your employment with Citi, up to a period of ten (10) years from the date of separation or termination of employment. If your employment application is not accepted, Citi will retain and process your Personal Data for a period of up to three (3) years from rejection of the application, to enable Citi to consider whether your profile is suitable for other vacancies at Citi, and to inform you of new vacancies or other recruitment initiatives. The abovementioned retention periods are subject to Citi's compliance with any domestic or foreign law or regulation, or Citi's involvement in any legal or regulatory claims, orders or actions. Following the expiration of the applicable retention period, Citi will either destroy, purge, anonymize or render inaccessible or unusable all Personal Data, excluding employment history information, which Citi will continue to store, process and access for statistical, management, regulatory and/or record purposes.

6. Citi implement technical, physical and organizational measures that are appropriate to the risk to protect the personal information that we process about you and ensure that your personal information is accessed by our employees and staff only on a "need-to-know basis" to ensure confidentiality, integrity and availability of your personal data.

7. Nothing herein shall affect, supplant or diminish any other consent provided by you, including as a customer or user of Citi products and services.

DESCRIPTION OF THE PERSONAL DATA TO BE ENTERED INTO THE SYSTEM

Citi may collect the following Personal Data directly from you, from any person authorized by you in a manner approved by Citi, from third parties including Relevant Individuals (as defined below), credit bureaus/credit information entities, fraud prevention and professional background checking entities, international sanctions lists, any publicly available databases or data sources:

(a) Personal Data about you, your family members, references, beneficiaries, counsels, attorneys in-fact, authorized signatories, guarantors, and other related individuals (collectively, "Relevant Individuals"), which may include, but are not limited to, names, identification documents, education, employment history, references, contact details, biometrics, pictures and images on photographs, video and other media, and other demographic data;

(b) Personal Data from cookies, or other technologies deployed for analysis and monitoring of visits to, usage and transactions in websites, email or other work-related applications, mobile applications, SMS or the use of any information technology application of and by Citi, social media networks, data aggregators and data integrators and other available data sources and the use of the internet or Citi's internal systems.



SCOPE AND METHOD OF PERSONAL DATA PROCESSING

The scope and method of Personal Data processing by Citi cover the following:

- (a) “Processing” refers to any operation or any set of operations performed upon Personal Data including, but not limited to, the collection, recording, organization, storing, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data, and outsourcing of these activities. Processing may be performed manually, or through automated means, if the Personal Data are contained or are intended to be contained in a system. Personal Data may be processed and stored in onshore or offshore systems.
- (b) “Profiling” refers to any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects containing that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- (c) “Data sharing” is the disclosure or transfer to a third party of Personal Data under the custody of Citi or its data processors and excludes outsourcing.

PURPOSE AND LEGAL BASIS FOR PROCESSING, PROFILING AND SHARING

Where the processing is necessary for Citi to perform a contract with you or for pre-contract steps

- i) for evaluation and processing of job applications, including employment, banking, credit and other background checks;
- ii) for employment and management of the Data Subject, creation and maintenance of records and/or arrangements (including banking and credit) necessary for the implementation and administration of employment policies and programs, including provision of employment references and certifications;
- iii) to make and carry out decisions and actions (including the use of vendors, service providers, business partners and subcontractors), in connection with training activities, performance management, mobility actions such as promotions, transfers, assignments or secondments, the provision of salaries, benefits and incentives, systems entitlement, workforce management and surveys, productivity and disciplinary actions, and other employment related policies, programs and initiatives;

Where Citi is required by applicable law or a legal obligation

- iv) to comply with any foreign or domestic legal, regulatory and compliance requirement (including US anti-money laundering, sanctions and tax regulations applicable to Citigroup Inc., and any of its affiliates and subsidiaries (collectively, “Citigroup”), any treaty or agreement between foreign and domestic governments applicable to Citigroup, and disclosure to any foreign or domestic stock exchange, court, authority, or regulator pursuant to relevant laws, guidelines, or order
- v) to verify the identity or authority of Relevant Individuals or your representatives, monitor and record calls and electronic communications



with you and the Relevant Individuals, and for record keeping, quality assurance, customer service, training, investigation, litigation and risk management purposes;

Where necessary for Citi's legitimate interests

- vi) for crime and fraud detection, prevention, investigation and prosecution;
- vii) to perform management reporting to Citigroup, operate control and management information systems, and carry out or implement business risk, control or compliance monitoring, review or testing, internal or external audits;
- viii) to enable an actual or proposed assignee of Citi, or participant or sub-participant or transferee of Citi's rights in respect of the Data Subject to evaluate or consummate a transaction intended to be the subject of the assignment, transfer, participation or sub participation;
- ix) to enable Citi to conduct and operate its business, comply with contractual obligations or initiatives of self-regulatory organizations or industry groups in the financial and business processing sectors, and for continuity of business or crisis management; and

Where required for the exercise of rights or defense of legal claims

- x) to enforce (including without limitation, collecting amounts outstanding) or defend the rights of Citi, its employees, officers and directors.

CLASSES OF RECIPIENTS OF THE DATA

Personal Data may be processed, profiled and shared to the following entities inside or outside the Philippines (each, a "Data Recipient") solely to implement the Permitted Purposes:

- i) a relevant agent, broker, contractor or third party service provider;
- ii) a person or entity which is part of Citigroup;
- iii) a person or entity to whom Citigroup is under an obligation or otherwise required to make disclosure pursuant to any foreign or domestic law, regulation, legal process, agreement with or between governmental authorities, self-regulatory or industry bodies of financial services providers or securities exchanges;
- iv) an actual or proposed assignee of Citi or participant or sub-participant or transferee of Citi's rights in respect of the Data Subject or any other Relevant Individual, and/or all or any part of the assets or business of Citi; and
- v) a person or entity to whom disclosure is necessary to achieve a Permitted Purpose.

YOUR RIGHTS AS A DATA SUBJECT

You have the right to be informed of the processing of your Personal Data, including any automated decision-making and profiling. You can ask Citi to: (a) access or provide a copy of your Personal Data; (b) correct your Personal Data; and (c) transfer your Personal Data to other organizations. You can also ask Citi to erase your Personal Data, or object to and



stop the processing of your Personal Data, but said rights may be limited in some situations, for example, where we are required to process your Personal Data by law.

If you wish to exercise these rights or if you have any queries about your Personal Data, please contact the Human Resource Department, or the Data Protection Officer, using the contact details below. If you have unresolved concerns, you have the right to complain to the National Privacy Commission and sue for damages.

HUMAN RESOURCES DEPARTMENT

For employees:

Inactive or Separated employees may send an email request to hrdataprivacy@citi.com

Current employees are required to create a case through HR Help Center >> Open a Case >>Workplace >> Employee Data Change Request OR Privacy Act Request.

For applicants:

The Head of Talent Acquisition Citi Career Center, Citi Plaza, 34th Street, Bonifacio Global City

Email: hrdataprivacy@citi.com

DATA PROTECTION OFFICER

16F, Citi Plaza, 34th Street, Bonifacio Global City

Email: CitiPHDPO@citi.com

AMENDMENTS

If we modify this HR Data Statement at any time, we will place the modified versions on this website. We encourage you to regularly review this HR Data Statement to ensure that you are always aware of what personal information we collect and how we use, store and disclose.

CONSENT

By acknowledging, I agree to the processing, profiling, and sharing of Personal Data with the Data Recipients in connection with my application, employment, training, internship, or other similar engagement with Citi, as provided in the Citi Philippines Human Resources Data Statement, the terms of which are incorporated herein by reference.

This Consent covers my Personal Data as well as Personal Data of the Relevant Individuals whose information was provided by me, my authorized representatives or third parties, including the Relevant Individuals and other available sources. Where I or my representatives have provided any Personal Data relating to any Relevant Individual to Citi, I confirm that each Relevant Individual has been informed and given consent to Citi's processing, profiling, and sharing of the Personal Data.