

## Privacy Circular (Staff)

### CITIBANK SINGAPORE CIRCULAR RELATING TO THE PERSONAL DATA PROTECTION ACT 2012 ("PRIVACY CIRCULAR") (FOR STAFF)

This Privacy Circular is applicable to all employees, secondees, interns, contract staff, agency staff, temporary staff and volunteers of Citibank Singapore Limited, Citibank, N.A. and any of its holding companies, associate companies, branches, subsidiaries, representative offices, affiliates and agents (collectively, "Citi") in Singapore (collectively, "Staff").

As you may be aware, Singapore has enacted the Personal Data Protection Act (No. 26 of 2012) (the "Act") which offers all individuals protection in respect of their personal data. This Privacy Circular has been prepared by Citi to explain to our Staff what personal data (as defined in the Act) Citi collects, how Citi protects it, and the circumstances under which Citi may use or disclose it.

If there is any use of your data that you do not agree to, please immediately notify your HR Generalist or supervisor. Please note that your employment or benefits with Citi may be affected if we are not able to use your data in the manner described.

#### 1. Purposes for which Information is collected, used and disclosed

Personal data relating to Staff, or of other individuals which are provided to Citi by Staff (e.g. personal data about family members) will generally be collected, used and disclosed by Citi for the following purposes:

- a. the administration and maintenance of personnel records including Fit & Proper forms
- b. to determine or investigate the suitability, eligibility or qualifications for employment, continued employment, recruitment, promotion and grants, sponsorships, awards and bursaries or other benefits including the conduct of performance appraisals and reviews, to operate recognition programs and to take decisions on fitness for work;
- c. for the provision of salary, commissions, wages, bonuses, allowances, remuneration, statutory contribution computing and payment and other payroll-related items;
- d. in connection with the administration, review and provision of benefits, including the review and provision of benefits, fees, expenses, leave and other entitlements;
- e. to provide you with Citi services (where applicable) or to carry out surveillance of your provision of Citi products and services to Citi customers;
- f. in connection with surveys (including salary surveys), donation drives and other Citi-organized events or activities you participate in;
- g. to obtain, renew or cancel work permits, employment passes and or other similar documents;
- h. to administer and operate physical and IT security measures, including CCTV, access cards and the like;
- i. for the operation of Citi IT systems and the provision of access rights to such systems;
- j. for identification, including the use of photographs and other indications of your likeness in this connection
- k. to record time spent on matters and projects, including maintaining sickness and other absence records;
- l. in connection with making or fulfilling travel arrangements;
- m. for tax matters of Staff or Citi and its related corporations;
- n. the provision of references to future or prospective employers, including other Citi affiliates;
- o. to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Citi or with governmental or quasi-governmental bodies or their requests, and any other use of data and information in accordance with any Citi-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing and law and regulations (including employee trading), which may involve the disclosure of your information to such third parties;
- p. for crime and fraud detection, prevention, investigation and prosecution;
- q. to enforce or defend the rights of Citi, Citi customers and its other Staff, contractual or otherwise;
- r. making disclosures as permitted or required by applicable law such as in connection with investigations and to assist law enforcement and government authorities in Singapore or elsewhere;
- s. to facilitate sales, mergers or reorganisations of Citi and its related corporations;
- t. to manage or audit any of the foregoing and to create management or strategy reports or analysis thereof;

- u. contacting your nominee in connection with emergencies, business continuity or disaster recovery; and
- v. and the provision of relevant information to our service providers that are engaged in relation to employment matters, where relevant.

For any of the purposes above, in particular to determine or investigate your suitability, eligibility or qualifications for employment, continued employment, recruitment, promotion, compensation, benefits, and recognitions in connection with the conduct of performance appraisals and reviews, and to verify or obtain an independent source for any information provided, Citi may obtain from, a third party (including background screening agencies, service providers and credit bureaus), or publicly available sources, Staff personal data.

Finally, Citi retains certain personal data of Staff even after they cease to be deployed or employed. This personal data will be used and disclosed for purposes as described above for any residual employment-related activities in relation to a former Staff, including the provision of references to future or prospective employers.

## **2. Representing Citi**

In the course of your work with Citi, you may assume the role of director, employee, dealer, trader, authorized signatory, agent, attorney or representative of Citi that may require Citi to share your personal data with other organisations to operate and administer Citi's relationships, businesses and dealings with such organisations. Such other organisation may collect, use or disclose your personal data for verification, due diligence and other legitimate legal and business purposes that the organisation may have, including those purposes as described in any personal data protection policies (by whatever name) of the relevant organisation, which may have been shared with you in connection with your assumption or such role.

## **3. Personal data of other individuals**

From time to time, you may provide, and Citi may collect, personal data about other individuals from you, including personal data of your next-of-kins, related parties, references or referrals (whether for employment or for business). You have to obtain the consent of such individuals prior to giving their personal data to Citi or you must have valid authority to provide such consent on the individuals' behalf. You may be asked to warrant that such consent has been obtained and/or to provide evidence of such consent or authority.

## **4. Types of Personal Data collected, used and disclosed**

Personal data which is collected, used or disclosed for the above purposes include name, address, identification details (including NRIC or passport images), details of shareholdings and other interests, photographs, videos or other representations of your likeness, biometric data, audio recordings of telephone conversations or other audio recordings of your voice, credit worthiness, residential status, credit standing, or credit capacity, health and medical records, education, employment, income, litigation and criminal records, all of which Staff may provide directly to Citi, Citi requests then collects, or which Citi collects from a third party or publicly available sources.

## **5. Our use of service providers**

Staff personal data may be transferred, held or processed by Citi, within or outside Singapore, by any person or entity which is a part of Citigroup or any third party service providers and contractors, for the purposes described above. Citi from time to time engages providers who provide administrative, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference or other background checks or other services to Citi in connection with the operation of the business of Citi.

Staff personal data may be transferred to any person or entity to whom a Citigroup entity is under an obligation or otherwise required to make disclosure pursuant to legal process or under the requirements of any foreign or domestic law, regulation, court order or agreement entered into, binding on or applying to Citigroup, or agreement entered into by Citigroup and any government authority, domestic or foreign, or between or among any two or more domestic or foreign governmental

authorities, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory of industry bodies or associations of financial services providers or securities exchanges with which Citigroup is required or expected to comply, all of which may be within or outside Singapore.

**6. How this Privacy Circular may be updated**

Citi will update this Privacy Circular from time to time in response to changing business requirements or changes to the law.