



## MARKETS AND SECURITIES SERVICES PRIVACY STATEMENT

This Privacy Statement applies to:

- Citi's Markets businesses which consist of the following products and services, as reorganised and reconstituted from time to time: Commodities, Credit, Derivatives, Equities, Futures, FX, Indices, Investment and Corporate Banking, Regulatory Reporting, Structured Products and products and services associated therewith or related thereto (for example: market commentary, views and perspectives, prime brokerage, direct market access, algorithms, trade ideas and FIX connectivity).
- Citi's Securities Services businesses which consist of the following services: agency securities lending and directed agent investment services (ASL/DAIS); direct custody and clearing; global custody (including order routing and related services in connection with investments in collective investment schemes) and global fund services (including fund administration (fund accounting), middle office, trustee/depository services and passive currency overlay services); tax-related, reporting and ancillary services (including VAT-related services); funds corporate services, compliance and investment monitoring services; proxy voting services; and collateral management services.

This Privacy Statement explains how Citi processes personal data about people with whom we come into contact (referred to as "you" in this document) in the course of our dealings with our clients and other relevant persons. This includes employees, officers, directors, beneficial owners and other personnel of our clients, service providers and other business counterparties (referred to as "Your Organization" in this document).

### 1. Who is responsible for your personal data and how can you contact them?

The Citi entities listed at the end of this Privacy Statement (referred to as "we" and "Citi" in this document) are the controllers of your personal data.

For more details you can contact our Data Protection Officer at [dataprotectionofficer@citi.com](mailto:dataprotectionofficer@citi.com) or Citigroup Centre, 33 Canada Square, Canary Wharf, London E14 5LB, United Kingdom.

### 2. Why do we process your personal data?

We process your personal data, as necessary to pursue our legitimate business and other interests, for the following reasons:

- to provide products and services to our clients and to communicate with you and/or our clients about them;
- to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;
- to monitor and analyze the use of our products and services for system administration, operation, testing and support purposes;
- to manage our information technology and to ensure the security of our systems;
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this;
- to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes;
- communicating with credit reference and information agencies; and



- for any other purpose that we specifically tell you about when we obtain data about you (or our client tells you about on our behalf).

We also process your personal data to comply with laws and regulations. We sometimes do more than the minimum required to comply with the strict requirements of the relevant law or regulation, but only as necessary to pursue our legitimate interests in cooperating with our regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets. This involves processing your personal data for the following reasons:

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third parties;
- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
- to conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud and anti-money laundering (AML) prevention and measures relating to sanctions and anti-terrorism laws and regulations and fighting crime. This includes know your customer (KYC) screening (which involves identity checks and verifying address and contact details), politically exposed persons screening (which involves screening client records against internal and external databases to establish connections to 'politically exposed persons' (PEPs) as part of client due diligence and onboarding) and sanctions screening (which involves the screening of clients and their representatives against published sanctions lists); and
- to record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity. To the extent permitted by law, these recordings are our sole property.

In most cases, we do not rely on consent as the legal basis for processing your personal data under EU data protection laws or under laws which are equivalent to EU data protection laws. We do not rely on any agreements or consents obtained in any contract with you as our legal basis for processing personal data under EU data protection laws or under laws which are equivalent to EU data protection laws. If you do not provide information that we request, we may not be able to provide (or continue providing) relevant products or services to, or otherwise do business with, you or Your Organization. We do not process your personal data for direct marketing purposes.

### **3. Where does Citi obtain personal data about you?**

We process personal data that you provide to us directly or that we learn about you from your use of our systems and our communications and other dealings with you and/or Your Organization. Your Organization will also give us some personal data about you. This may include your name, company, title, date of birth and job description, contact details such as your business email address, physical address and telephone number and other information required for KYC, AML and/or sanctions checking purposes (e.g., copies of your passport or a specimen of your signature). We also obtain some personal data about you from international sanctions lists, publically available websites, financial market infrastructures (including settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities) databases and other public data sources.



#### **4. To whom do we disclose your personal data?**

We disclose your personal data, for the reasons set out in Section 2, as follows:

- to Your Organization in connection with the products and services that we provide to it if Your Organization is our client, or otherwise in connection with our dealings with Your Organization;
- to other Citi entities (this includes the entities referenced at <http://www.citigroup.com/citi/about/countrypresence/>) for the purpose of managing Citi's client, service provider and other business counterparty relationships;
- to counterparty banks, central banks, payment infrastructure providers and other persons from whom we receive, or to whom we make, payments on our clients' behalf;
- to brokers, custodians, sub-custodians, fund administrators, fund houses, depositaries, trustees, financial market infrastructure service providers (including settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities) and other persons from whom we receive, or to whom we make, payments on our clients' behalf, in each case to service your or Your Organization's account and investment;
- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services;
- to our professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);
- to legal advisors, government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings;
- to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction or market, domestic or foreign;
- to other persons where disclosure is required by law or to enable products and services to be provided to you or our clients; and
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets.

#### **5. Where do we transfer your personal data?**

We may transfer your personal data to Citi entities, regulatory, prosecuting, tax and governmental authorities, courts and other tribunals, service providers and other business counterparties located in countries outside the European Economic Area (EEA), including countries which have different data protection standards to those which apply in the EEA. This includes transfers of personal data to India, the United States of America and Malaysia. When we transfer your personal data to Citi entities, service providers or other business counterparties in these countries, we will ensure that they protect your personal data in accordance with EEA-approved standard data transfer agreements or other appropriate safeguards.

#### **6. How long do we keep your personal data?**

We keep your personal data for as long as is necessary for the purposes of our relationship with you or Your Organization or in connection with performing an agreement with a client or Your Organization or complying with a legal or regulatory obligation.

#### **7. What are your rights in relation to personal data?**

You can ask us to: (i) provide you with a copy of your personal data; (ii) correct your personal data; (iii) erase your personal data; or (iv) restrict our processing of your personal data. You can also object to



our processing of your personal data. These rights will be limited in some situations; for example, where we are required to process your personal data by EU or EU member state law.

To exercise these rights or if you have questions about how we process your personal data, please contact us using the contact details in Section 1. We can in particular, provide copies of the data transfer safeguards referred to in Section 5. You can also complain to the relevant data protection authorities in the EEA member state where you live or work or where the alleged infringement of data protection law occurred. You can find contact information for EU data protection authorities here: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## 8. Changes to this Privacy Statement

This Privacy Statement takes effect on 25 May 2018; it was last updated on 3 September 2018. If we change it, to keep you fully aware of our processing of your personal data and related matters, we will post the new version to this website.

## 9. Data controllers

The relevant data controllers of your personal data in relation to Citi's Markets business and various Citi Securities Services businesses are as follows:

**Markets business:** One or more of the following entities, depending on the nature of the relevant services provided under our Terms of Business with our clients:

- Citigroup Global Markets Limited (its registered office is at Citigroup Centre, Canada Square, London E14 5LB),
- Citibank, N.A., London Branch (registered as a branch of Citibank, N.A. in England and its establishment office address is Citigroup Centre, Canada Square, London E14 5LB),
- Citibank Europe plc, UK Branch (registered as a branch of Citibank Europe plc in England and its registered office is at 1 North Wall Quay, Dublin 1, Ireland, D01T871),
- Citibank Europe plc, Romania Branch 145 Calea Victoriei, 1st District, 010072, Bucharest
- Citibank Europe plc Hungarian Branch Office Magyarországi Fióktelepe, 1051 Budapest, Szabadság tér 7. Bank Center
- Citibank Europe plc organizacni slozka Bucharova 2641/14, 158 02, Praha 5
- Citibank Europe plc Hungarian Branch Office 1051 Budapest, Szabadság tér 7
- Citigroup Global Markets Deutschland AG, Reuterweg 16, 60323 Frankfurt, Germany, and/or
- Citibank Europe plc, Germany Branch, Reuterweg 16, 60323 Frankfurt, Germany

unless otherwise specified in the Terms of Business with our clients, in which case, you should refer to those Terms of Business for our identity and contact details.

### Direct custody and clearing business:

- Citibank Europe plc, 1 North Wall Quay, Dublin, 1, Ireland
- Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Europe plc, Bulgaria Branch, Serdika Offices, 10th floor, 48 Sitnyakovo Blvd., Sofia 1505, Bulgaria



- Citibank Europe plc, organizacni slozka, Bucharova 2641/14, 158 02 Prague 5, Stodůlky, Czech Republic acting on behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland
- Citibank Europe plc, Greece Branch, Othonos 8, Athens, 10557, Greece
- Citibank Europe plc, Hungarian Branch Office, Bank Center, Citibank Tower, Szabadság tér 7, H-1052, Budapest, Hungary on behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland
- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank, N.A., Milan Branch, Via dei Mercanti, 12, 20121 Milan, Italy
- Citibank Europe plc, Dublin – Romania Branch, Calea Victoriei 145 Sector 1, Bucharest, Romania
- Citibank Europe plc, pobočka zahraničnej banky, Dvořákovo nábrežie 8, 811 02 Bratislava, Slovak Republic acting on behalf of Citibank Europe plc, 1 North Wall Quay, Dublin 1, Ireland
- Citibank Europe plc, Sucursal en Espana, José Ortega Y Gasset, 29, 28006 Madrid, Spain
- Citibank Europe plc, Sweden Branch, Box 1422, SE 111 84 Stockholm, Sweden
- National City Nominees Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- N.C.B. Trust Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Vidacos Nominees, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Citibank London Nominees Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB

**Global custody business:** The relevant data controllers of your personal data are:

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank Europe plc, Luxembourg Branch, 31, Bourmicht, 8070 Bertrange, Grand Duchy of Luxembourg
- Citifriends Nominee Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Nominees (Ireland) Designated Activity Company, 1 North Wall Quay, Dublin 1
- CUIM Nominee Limited, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citiclient Nominees No 8 Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- N.C.B. Trust Limited, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB
- Vidacos Nominees, Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB

**Global fund services (including fund administration (fund accounting), middle office, fiduciary/depository services and passive currency overlay services); tax-related, reporting and ancillary services (including VAT-related services) business:**

- Citibank Europe plc, 1 North Wall Quay, Dublin, 1, Ireland



- Citi Depository Services Ireland Designated Activity Company, 1 North Wall Quay, Dublin, 1, Ireland
- Capital Residential Fund Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Capital Residential Fund Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Property (AIPF) Nominee No 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Property (AIPF) Nominee No 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Property (AIPF) Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI GREF Nominee 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI GREF Nominee 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI UKPF Nominee No 1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP SLI UKPF Nominee No 2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Threadneedle UK Property Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CIP Threadneedle UK Property Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CitiClient (CPF) Nominees Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CitiClient (CPF) Nominees No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CTCL (BUKP) Fund Nominee No.1 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- CTCL (BUKP) Fund Nominee No.2 Limited, Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Europe plc, UK Branch, Citigroup Centre, Canada Square, Canary Wharf, London E14 5LB
- Citibank Europe plc, Greece Branch, Othonos 8, Athens, 10557, Greece
- Citibank Europe plc, Hungarian Branch Office, Bank Center, Citibank Tower, Szabadság tér 7, H-1052, Budapest, Hungary
- Citibank Europe plc, Netherlands Branch, Schiphol Boulevard 257, WTC D Tower, PO Box 75567, 1118 Schiphol, The Netherlands



- Citibank Europe plc, Luxembourg Branch, 31, Z.A.BOURMICHT , Bertrange LU L-8070
- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom
- Citibank Europe plc, Sweden Branch, Box 1422, Sergelgatan 1, SE-111 84 Stockholm, Sweden

**Agency securities lending and directed agent investment services business:**

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom

**Collateral management services business:**

- Citibank, N.A., London Branch, Citigroup Centre, Canary Wharf, London E14 5LB, United Kingdom