

**Citibank Singapore Circular relating to the  
Personal Data Protection Act ("Circular")**

*This Circular is applicable to all persons and entities who have opened or proposes to open an account with, and/or who have provided or proposes to provide guarantee or third party security to: (i) Citibank Singapore Limited ("CSL"); (ii) Citibank N.A. Singapore branch ("CNA SG"); and/or (iii) another branch, subsidiary, representative office, affiliate or agent of Citibank, N.A., where the relevant account or account application to the extent is serviced by representatives of CSL or CNA SG.*

This Circular has been prepared by CSL and CNA SG (collectively, "**Citi**") in connection with the Personal Data Protection Act (No. 26 of 2012) of Singapore (the "**Act**"), to explain what personal data (as defined in the Act) Citi collects and the circumstances under which Citi may use or disclose it. I agree that my use or continued use of any of Citi's services shall be deemed as my acceptance and agreement to be bound by the provisions of this Circular.

Citi's goal is to maintain the trust and confidence of all its customers and prospective customers in its handling of personal data.

All references in this Circular to "*I*", "*me*", "*my*", "*we*", "*us*" and "*our*" refer to the person(s) who opened or proposes to open an account with, or who have provided or proposes to provide guarantee or third party security to Citi. All references in this Circular to "*Citi*", "*you*", and "*your*" refer to Citi.

**Information Citi Collects and Uses**

- a) From time to time, Citi may collect directly from me, from any person authorized by me in a manner approved by you, from third parties including Relevant Individuals (defined below) and from publicly available sources including credit bureaus the following information and data:
  - i) personal data about me, my family members, my friends, my beneficiaries, my attorneys, my shareholders, my beneficial owners (if relevant), persons under any trust, trustees, partners, committee members, directors, officers or authorized signatories, guarantors, other security providers and other individuals (collectively all of the foregoing who are natural persons, "**Relevant Individuals**"), which may include names, identification particulars, contact details, products and services portfolio information, transaction patterns and behaviour, financial background, investment history, educational background and demographic data;
  - ii) information and data generated in the ordinary course of the continuation of my banking/financial relationship with Citi, for example, during account reviews or when a Relevant Individual gives instructions, writes checks, transfers funds, deposits money, enters into a transaction or arranges banking/credit facilities for himself/herself or for any third party or participation in contests or rewards programmes and other information and records, such as my preferences, my answers to questions intended for security verification and data I choose to provide; and
  - iii) information from cookies, or other technologies deployed for analysis of visits to websites or the use of any information technology application of Citi.
- b) I acknowledge that where a Relevant Individual fails to supply relevant information or data or withdraw consents in respect of use and/or disclosure of relevant information or data as described in this Circular, Citi may be unable to open or continue accounts, or establish or continue banking/credit facilities or provide banking/financial products/services. Citi will inform the Relevant Individual of likely consequences where the Relevant Individual withdraws consent given or deemed to have been given.
- c) I warrant to Citi that where I or my representatives are responsible for the provision of any information or data relating to any Relevant Individual to Citi, or actually provide any such information or data to Citi, I have informed each Relevant Individuals and such Relevant Individual has given consent to Citi's collection, use and disclosure of such information as described in this Circular, and that I will obtain such consent in advance of providing any similar information in the future.
- d) I agree that data of a Relevant Individual may be processed, kept, transferred or disclosed in and to any country/jurisdiction as Citi considers appropriate or necessary, in accordance with applicable law for the purposes described below. Such data may also be processed, kept, transferred or disclosed in accordance with the local practices and laws, rules and regulations (including any regulatory requests, governmental acts and orders) in such country/jurisdiction.

#### Purposes for which Information is Used and Disclosed

- e) I agree that my information and data may be used and disclosed, including to places in or outside Singapore for the following purposes (collectively “Permitted Purposes”):
- i) to make decisions relating to the opening or continuation of accounts and the establishment, provision or continuation of banking/credit facilities or banking/financial services including banking, investment, trust, insurance, credit card, personal loan, mortgage, auto loan, financial and wealth management products and services and otherwise maintaining accurate “know your customer” information and conducting anti-money laundering, credit and background checks;
  - ii) to provide, operate, process and administer my Citi accounts and services or to process applications for Citi accounts and services, any banking/financial transactions (including remittance transactions and credit/financial facilities), and to maintain service quality and train staff;
  - iii) to undertake activities related to the provision of the Citi accounts and services including the subscription or proposed subscription of products or services (whether offered or issued by Citi or otherwise) and the provision of research reports;
  - iv) to provide product related services and support, including, without limitation, provision of processing or administrative support or acting as an intermediary / nominee shareholder / agent in connection with your participation in various products (whether such products are offered or issued by Citi, Citi’s affiliates, third parties or through other intermediaries or distributors);
  - v) to provide or grant access to product related materials such as offering documents, research reports, product profiles, fact sheets, term sheets or other product related materials;
  - vi) to fulfil foreign and domestic legal, regulatory and compliance requirements (including US anti-money laundering and tax obligations applicable to Citigroup Inc., including any of its affiliates and subsidiaries (collectively, “Citigroup”) and disclosure to any stock exchange, court, authority or regulator pursuant to relevant guidelines, regulations, orders, guidance or requests from such organisations) and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to Citigroup;
  - vii) to verify the identity or authority of Relevant Individuals, my representatives who contact Citi or may be contacted by Citi and to carry out or respond to requests, questions or instructions from verified representatives or other parties pursuant to your then-current security procedures;
  - viii) for risk assessment, statistical, trend analysis and planning purposes, including to carry out data processing, statistical, credit, risk and anti-money laundering analyses, creating and maintaining credit scoring models, and otherwise ensuring ongoing credit worthiness of Relevant Individuals including conducting credit and other background checks and reviews, and maintaining credit history of individuals (whether or not there exists any direct relationship between that Relevant Individual and Citi) for present and future reference;
  - ix) to monitor and record calls and electronic communications with Relevant Individuals for record keeping, quality, training, investigation and fraud prevention purposes;
  - x) for crime and fraud detection, prevention, investigation and prosecution;
  - xi) to enforce (including without limitation collecting amounts outstanding) or defend the rights of Citi, its employees, officers and directors, contractual or otherwise;
  - xii) to perform internal management, to operate control and management information systems, and to carry out internal audits or enable the conduct of external audits;
  - xiii) to enable an actual or proposed assignee of Citi, or participant or sub-participant of Citi’s rights in respect of you to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation
  - xiv) to comply with contractual arrangements by or between financial industry self-regulatory, financial industry bodies, associations of financial services providers or other financial institutions, including assisting other financial institutions to conduct credit checks or collect debts;
  - xv) to manage Citi’s relationship with you, which may include providing information to you or a Relevant Individual, about Citi or Citi’s affiliates products and services, where specifically consented to or where permissible under applicable laws and regulations;
  - xvi) for marketing financial, banking, credit, investment, trust, insurance, credit card, personal loan, mortgage, auto loan, financial and wealth management related products or services by various modes of communication including mail, telephone call, SMS, fax, electronic mail, internet , market research, and designing or refining any similar products or services including by conducting market research, data analysis, and surveys;
  - xvii) to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Citigroup and any other use of data and information in accordance with any Citigroup-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
  - xviii) purposes relating directly thereto.

- f) In addition, I agree that my information and data may be use and disclosed, where permitted by applicable law, to the following entities (inside or outside Singapore) for any relevant purpose which is part of the Permitted Purposes or for processing in accordance with any purpose described in the Permitted Purposes:
- i) any agent, contractor or third party service provider who provides administrative, mailing, telemarketing, direct sales telecommunications, call centre, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference or other background checks, custodian, depository, nominee or securities clearing or other services to Citi in connection with the operation of the business of Citi;
  - ii) any person or entity which is part of Citigroup although only to the extent necessary to fulfil the relevant Permitted Purpose;
  - iii) any drawee or drawer bank in connection with any cheque or equivalent;
  - iv) any financial institution, charge or credit card issuing companies, trustees, insurers, securities and investment services providers with whom I have or propose to have dealings;
  - v) credit reference agencies, credit information bureaus, and, in the event of default, debt collection agencies;
  - vi) 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, or any disclosure pursuant to any contractual or other commitment of Citigroup with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers, or securities exchanges, all of which may be within or outside Singapore including disclosure to courts, tribunals, and/or legal, regulatory, tax and government authorities, whether such legal process, obligation, request, requirement, agreement or guidance may be existing currently or created in the future;
  - vii) any financial institution, processing agent, or any other person who will be involved in remittance transactions or any banking/financial activities;
  - viii) any actual or proposed assignee of Citi or participant or sub-participant or transferee of Citi's rights in respect of me or any other Relevant Individual, all or any part of the assets or business of Citi; and
  - ix) any party giving or proposing to give a guarantee or third party security to guarantee or secure my obligations or those of any Relevant Individual.

#### **Collection, use and disclosure in respect of Credit Reference Agencies**

- g) Of the information and data which may be collected or held by Citi from time to time in connection with a Relevant Individual having or applying for a credit card, personal loan, mortgage, auto loan (whether as a cardholder, borrower, mortgagor or guarantor and whether in the Relevant Individual's sole name or in joint names with others), the following information and data relating to the Relevant Individual (including any updated data of any of the following data from time to time) may be provided by Citi, on its own behalf and/or as agent, to a credit reference agency:
- i) full name;
  - ii) capacity in respect of facility/loan (as cardholder, borrower, mortgagor or guarantor, and whether in the Relevant Individual's sole name or in joint names with others);
  - iii) identification or travel document number;
  - iv) date of birth;
  - v) correspondence address;
  - vi) account number in respect of each facility/loan;
  - vii) type of facility;
  - viii) account status (e.g., active, closed, write-off (other than due to a bankruptcy order), write-off due to a bankruptcy order);
  - ix) repayment trend and status (e.g. full or partial payment, current or late);
  - x) if any, account closed date in respect of each facility/loan;
  - xi) facility/loan application date; and
  - xii) where there is any outstanding material default, account general data together with the default data relating to such material default.

The credit reference agency will use information and data supplied by Citi for the purposes of compiling a count of the number of similar facilities from time to time held by the Relevant Person with credit providers in Singapore, as cardholder, borrower, mortgagor or guarantor respectively and whether in the Relevant Person's sole name or in joint names with others, for sharing in the consumer credit database of the credit reference agency by credit providers.

- h) For the purpose of paragraph (e) above, Citi may access and obtain from the credit reference agencies such personal and account information or records of any Relevant Individual (including information about the number of facility/loan count) held by any credit reference agency in accordance with the Act. Without prejudice to the foregoing, Citi may from time to time access the personal and account information or records of the any Relevant Individual (including information about the number of mortgage count) held by a credit reference agency for reviewing any of the following matters in relation to the existing credit facilities granted to the Relevant Individual or to a third party which obligations are guaranteed by the Relevant Individual:
- (i) an increase in the credit amount;
  - (ii) the curtailing of credit (including the cancellation of credit or a decrease in the credit amount);
  - (iii) granting of additional facility/loan; or
  - (iv) the putting in place or the implementation of a scheme of arrangement with the Relevant Individual or the third party.

Citi may have obtained a credit report on the Relevant Individual from a credit reference agency in considering any application for credit. In the event the Relevant Individual wishes to access the credit report, Citi will advise the contact details of the relevant credit reference agency.

## Inquiries

- i) Access and Correction requests are to be submitted to [cpbclientenquiry@citi.com](mailto:cpbclientenquiry@citi.com) or your Citi Private Bank service representative. Access Request Form is provided upon request. I acknowledge that an administrative fee may be charged to process my Access Request.
- j) The person to whom requests under the Act, including complaints and requests for information regarding policies and practices and kinds of data held are to be addressed to **Citi Personal Data Protection Officer** at 8 Marina View, #20-01 Asia Square Tower One, Singapore 018960 or [cpbclientenquiry@citi.com](mailto:cpbclientenquiry@citi.com).
- k) Where permissible by my account terms and conditions, I hereby agree that Citi may amend and vary the terms of this Circular from time to time and that upon notification to me of such amended Circular, the contents thereof shall similarly amend, vary and supplement such account terms and conditions, agreements and/or arrangements aforesaid with effect from the date specified in such amended Circular, and without prejudice to the foregoing, my use or continued use of any of Citi's services after such change shall also be deemed as my acceptance and agreement to the same.
- l) I acknowledge that nothing in this Circular limits or seeks to limit my rights under the Act.