

PRIVACY OF PERSONAL INFORMATION STATEMENT (“Privacy Statement”)

Our Privacy Notice

Our goal is to maintain your trust and confidence when handling personal information about you. You Have Choices:

As a Citi Private Bank customer, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives.

Security of Personal Information:

The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

Privacy Officer

We have designated a Privacy Officer to ensure our compliance with applicable law, to receive and respond to customers’ questions and complaints, and to deal with requests for access to and rectification of personal information files.

Corporate customers and business customers will receive the privacy protections stated in this Privacy Statement, even though corporate and business accounts and services are not personal accounts or services.

Categories of Personal Information We Collect, Hold and The Means by Which We Collect Them

The nature of personal information we collect and hold about you may include, but is not limited to:

- information we receive from you on applications or other forms, such as name, gender, date of birth, address, telephone number, email address, occupation, employer, assets, income, language preference and personal identification information (such as government-issued identification, social insurance number, driver’s license, passport and/or, where permitted provincial health insurance card);
- information we receive from you on a voluntary basis when we are conducting a survey of your preferences, needs or interests;
- information about your transactions with us, our Affiliates, or third parties, such as account numbers, account balances, payment history, and account activity;
- information we receive from your employer; and
- information about your device, your IP address, your location, your activities on Citi websites and your online preferences.
- Behavioural elements of your biometric data, including information on how you interact with InView (our web-based access and mobile application), such as:
 - For web-based access (such as desktop or laptop): data about your mouse speed and movements, your keystroke rhythm, your keyboard usage characteristics, your touch events, your scrolling, your resizing events, your interactions with user interface (UI) fields and your hosting device information.
 - For mobile application: data about your swipe gestures, mobile screen taps, screen orientation and your hosting device information.

We are not collecting any sensitive information from our Affiliates or third parties, such as medical information, detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We collect your personal information through electronic and physical applications forms.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Personal Information

The Bank may use the personal information we collect about you for the following purposes:

- to make decisions about applications, including verifying your identity and to detect and prevent fraud;
- in the case of behavioural biometric data, for risk mitigation, including fraud detection;
- in the case of a Social Insurance Number, for tax reporting purposes, as identification for opening a deposit account and cashing a government cheque
- to evaluate credit worthiness, monitor, service and collect your account;
- to respond to your inquiries about applications, accounts or other services;
- to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- to contact you by email with offers, advertisements, and promotions which may be of interest to you (as permitted by law). You may unsubscribe at any time by using the “unsubscribe” link at the bottom of the email or by contacting your Citibank Canada’s representative;
- to understand your needs and to offer products and services to meet those needs; and
- such other purposes as we disclose in this Privacy Statement or that we identify to you from time to time or as permitted by law.

Disclosures of Your Personal Information

- In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to us or destroy it, without keeping a copy. cheque and statement preparation, printing and other administrative services;



Private Bank

- card, security code and product/service issuance services;
- settlement and valuation services;
- data processing;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our Affiliates or Third Party Service Providers;
- financial, professional advisory and wealth management services;
- participating in payment systems and network or participating in payment clearing and settlement systems in association with other financial institutions;
- managing various banking, financial and wealth management services benefits;
- distributing information and/or promotional offers to you related to the products and services you have with Citi;
- debt collection activities on accounts you maintain with us;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the accounts, products and services you have with us, or as otherwise permitted or required by law.

Some of our service providers (including our Affiliates and Third Party Service Providers acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions).

If you have any questions, or wish to obtain further written information about our policies and practices with respect to the collection, use, disclosure or storage of your personal information by service providers or affiliates outside of Canada, you may contact our Privacy Officer at canada.privacy.office@citi.com.

Affiliates With Whom We May Share Personal Information

Our affiliates are the family of companies that form part of Citigroup. A complete list of our affiliates is available from the Privacy Officer at the address or telephone number indicated in the Contacting Us section of this Privacy Statement.

Business Transactions

From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those business transactions. Personal information may be used by us and disclosed to parties connected with certain business transactions, including the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets, for the purposes of evaluating and/or performing those proposed business transactions. These purposes may include:

- permitting those parties to determine whether to proceed or continue with a proposed business transaction;
- fulfilling inspection, reporting or audit requirements or obligations to those parties; and
- permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Privacy Statement.

Consent

The Customer consents to the collection, processing, storage, sharing, transfer and disclosure by the Bank of any Confidential Information to and between the Bank, the Bank's Affiliates, Representatives and third parties selected by any of them and, wherever situated, and to the Authorities for confidential use including, by way of non-exhaustive example, in connection with the provision of any service and for data processing, statistical and risk analysis purposes and for the purposes of complying with any law, court, regulator, legal process, agreement entered into with or between Authorities, investigation of any governmental authority in any jurisdiction, domestic or foreign in connection with any Government Requirement (including FATCA). Customer represents that it has secured from any Controlling Person, Data Subject or other person regarding whom Customer has provided information to the Bank any consents and waivers necessary to permit the Bank, the Bank's Affiliates, Representatives, and its and their Third Party Service Providers and Payment Infrastructure Providers to carry out the actions described in the preceding sentence, and that it will secure such necessary consents and waivers in advance of providing similar information to the Bank in the future.

Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services, in which case we assume that you consent). Consent may be given by your authorized representative. You may withdraw your consent to use and share your personal information at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact us at the address or telephone number in the Contacting Us section below.

Note: By opening, using or maintaining an account with us, you are consenting to us establishing and maintaining a file of personal information about you and obtaining and exchanging, from time to time, all information about you (including credit information) with our Affiliates and agents, person or corporation with whom you have or may have financial relations, government or regulatory agency, or supplier of services or benefits relating to your account for the purposes described in this Privacy Statement.

Withdrawal or refusal of consent is subject to legal and contractual restrictions. The Bank can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity, and upon approval of your application, consent may not be withdrawn as it relates to processing, collecting or reporting your account information. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please remember that we and our Affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number information you have provided to us.

Please also remember that during the term of a loan or credit facility you have with us, you may not withdraw your consent to our ongoing collection, use or disclosure of your personal information in connection with the loan or credit facility.

Accessing Your File

We will establish and maintain a file of personal information for each applicant and customer. In doing so, it is your responsibility to inform us of any changes whatsoever that



Private Bank

could affect the status of your accounts or services with us. Your file will be kept by us and will be accessible, but not limited to Citibank Canada locations. Only our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. This includes, but is not limited to: Bankers, Investment Counsellors, Service Teams, Operations, Legal, Compliance and Auditors.

You have the right to access your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can obtain the Customer Access To Personal Information Request form from us by contacting us at the address or telephone number mentioned in the Contacting Us section below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within thirty (30) days.

Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing our confidential or proprietary information;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information

Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

Each Citi employee is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a Code of Conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law. We do not collect any personal information from visitors browsing our websites, although personal information may be requested if a visitor chooses to send us an email message.

Contacting Us

To file a privacy complaint, an opt-out request, to request access to your personal information or to report incorrect personal information, or to obtain information about our policies and practices including our use of third parties and Affiliates with whom we share your personal information, please contact us at:

Citi Private Bank, Citibank Canada and/or Citibank Canada Investment Funds Limited
123 Front Street West, Suite 2000
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-888-245-1112
Email: Canada.Privacy.Office@citi.com

We will investigate all complaints and will generally respond within thirty (30) days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

Citi Private Bank is a business of Citigroup Inc. ("Citigroup") which provides its clients access to a broad array of products and services available through bank and non-bank affiliates of Citigroup. Not all products and services are provided by all affiliates or are available at all locations.

In Canada, Citi Private Bank is a division of Citibank Canada, a Schedule II Canadian chartered bank. References herein to Citi Private Bank and its activities in Canada relate solely to Citibank Canada and do not refer to any affiliates or subsidiaries of Citibank Canada operating in Canada. Certain investment products are made available through Citibank Canada Investment Funds Limited ("CCIFL"), a wholly owned subsidiary of Citibank Canada. Investment Products are subject to investment risk, including possible loss of principal amount invested. Investment Products are not insured by the CDIC, FDIC or depository insurance regime of any jurisdiction and are not guaranteed by Citigroup or any affiliate thereof.

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