

Citi Velocity Privacy Notice

OUR PRIVACY NOTICE

ABOUT THIS NOTICE

This notice tells you how we may collect, handle, disclose and transfer personal information about you (and other individuals whose information you may provide to us) in connection with the Citi Velocity website and any access thereto via a mobile application (“Citi Velocity”). In this notice, “we”, “our” or “Citi” refers to the legal entity or entities in the Institutional Clients Group division of Citigroup Inc. that provide(s) products, services or other information to you or the firm that you represent through or in connection with Citi Velocity. Further information about these entities is given in the Citi Velocity [Terms of Use](#).

In the [Terms of Use](#), you agree that we may collect, handle, disclose and transfer your personal information as described in this notice and that you will abide by your data privacy responsibilities set out in this notice.

Further information about our collection, handling, disclosure and transfer of your personal information may be given in the agreements between us and your firm.

PERSONAL INFORMATION WE COLLECT AND MAY DISCLOSE

Registration

We collect or generate some information about you in the registration process. This includes, for example, your name, geographical and email address, account type and status and user id and password, your firm's identity (and your department and location within you firm), a record of your acceptance of the [Terms of Use](#) and information as to your rights of access to Citi Velocity.

Information on your use of our site and your communications with us

We collect traffic information about all visitors to Citi Velocity and our other websites, including the collection of your IP address. This includes information about which web pages you access or visit and your use of the functions provided by Citi Velocity, including certain financial, transaction and market data. We may also monitor and record your telephone, email, instant messaging and other communications with us in connection with Citi Velocity, and we collect aggregated information about how many users log into Citi Velocity on a daily basis.

Information you give us

If you give us information about other individuals when using Citi Velocity, you must first refer them to this notice and obtain their consent to our collection, handling, disclosure and transfer of their personal information as described in this notice.

You should not give us any particularly sensitive personal information, whether about yourself or anyone else – this includes, in particular, information regarding racial or ethnic origin, political, religious or other similar beliefs, health or sex life, trade union membership,

criminal record, offences committed or alleged to have been committed, and social security, national insurance and other similar national identifying numbers.

Cookies

We also use cookies. A cookie is a small data file that many websites write to your computer's hard disk for record keeping purposes when you visit them – we also use the term to cover web beacons and other similar technologies. Cookies allow us to measure activity in Citi Velocity and to improve your user experience, for example by remembering your passwords and viewing preferences, thus allowing you to visit various parts of our websites without re-registering. We also use cookies to measure activity on Citi Velocity and our other websites and to make improvements and updates based on which areas are popular and which are not.

You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of Citi Velocity if cookies are disabled and the features we draw to your attention within Citi Velocity may not be as relevant to you or tailored to your interests. By agreeing to the [Terms of Use](#) you agree to our use of cookies as described above, in your own right and behalf of your firm, unless your browser is set to decline them.

OUR USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We use the information we collect in connection with Citi Velocity to provide and administer the portal and the functions that we perform through the portal and generally to manage our relationship with you and your firm. We may also use the information for the following purposes:

- informing you and your firm of developments on Citi Velocity or with respect to other products or services of Citigroup and its affiliates (unless you have told us that you do not wish to receive such information by contacting us as described below ([Your Rights](#)) or clicking on the “unsubscribe” link at the bottom of any communication we send you);
- meeting obligations to and co-operating with stock exchanges, alternative trading systems, clearing and settlement agencies, brokers and other similar entities;
- performing our obligations under applicable laws and regulations anywhere in the world, including anti-money-laundering and anti-terrorist laws and regulations, co-operating with courts and other tribunals and with national and international regulatory, prosecuting and other governmental authorities, and taking steps in the fight against fraud and other crimes; and
- monitoring and improving our own businesses (including research, analysis, sales and marketing purposes) – although typically this will involve use of information only on an aggregated basis – and disposing of businesses to third party purchasers.

Our use of your personal information for these purposes may include disclosure to our affiliates and to our or their service providers, to your firm and its affiliates, and to stock exchanges, alternative trading systems, clearing and settlement agencies, brokers, courts and other tribunals, national and international regulatory, prosecuting and other governmental

authorities, other financial institutions with whom we share information for fraud- and other crime-prevention purposes, purchasers (and potential purchasers) of our businesses, and (in each case) their professional advisors and service providers, and other similar bodies. Given the international nature of our business, this may involve transfer of personal information to any country in the world, including countries which may not have laws protecting the use of your personal information which are as strong as the laws in your country. By accepting the [Terms of Use](#) you agree to these international transfers.

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 in accordance with 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.

YOUR RIGHTS

We abide by applicable data protection and privacy laws in our collection, use, disclosure and transfer of personal information. You may have rights of access to and/or correction of the information that we hold about you under these laws and, in limited circumstances, you may be entitled to require us to cease processing your personal information. If you wish to seek to exercise any these rights, or have questions about this notice or our use of your personal information, please contact us at: citivelocityprivacy@citi.com.

NOTICE OF CHANGES

We may change this notice from time to time. The effective date of this notice, as stated below, indicates the last time this notice was revised or materially changed. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed the notice.

EFFECTIVE DATE

This policy was last modified on September 16, 2011.