



The Privacy Policy (the "**Policy**") applies only to institutional banking products or services of Citibank (China) Co., Ltd ("**Citi**" or "**we**").

Last Updated: Apr 2024

If you have any questions, comments or suggestions about this Policy, please contact us using the information below:

Email: china.citisevice@citi.com.

Registered Address: Unit01A&04 of Flr28, Flr29, Flr30, Unit01 of Flr33, Flr34, and Flr35, CitiTower, No.33, Huayuanshiqiao Road, Shanghai, China  
Telephone:800 820 1268 (Only for fixed phones in mainland China) to contact service representatives of CitiService. Outside the country, please call +86 21 6860 4588. Customers may need to pay communication charges to telecom operators for such calls (charges are as set by respective telecom operators).

This Policy will help you understand the following:

1. How we collect and use your personal information
2. How we use cookies and similar technologies
3. How we share, transfer, and publicly disclose your personal information
4. How we protect your personal information
5. Your rights
6. How personal information is transferred globally
7. When we collect your sensitive personal information
8. How we update this Policy
9. How to contact us
10. Language

We understand the importance of personal information (as defined below) to you and will do our utmost to protect your personal information. We are committed to maintaining your trust in us and to abide by the following principles to protect your personal information: the principle of consistency of rights and responsibilities, the principle of clear objectives, the principle of consent, the principle of minimum sufficient use, the principle of ensuring security, the principle of subject participation, the principle of openness and transparency, etc. At the same time, we promise that we will take appropriate security measures to protect your personal information in accordance with the industry's mature security standards.

Please read and understand this Policy carefully before using our products (or service). **In particular, this Policy has informed you of the processing of sensitive personal information (as defined below) and the cross border transfer of personal information, and you shall be deemed to have given your separate consent to each processing once you have accepted this Policy or are deemed so.**

## **1. How we collect and use your personal information**

Personal information refers to all kinds of information related to you being identified or identifiable which is recorded by electronic or other means, excluding any information processed anonymously..

We collect and use your personal information only for the purposes stated in this Policy:

#### 1.1 Information collected by CitiDirect online banking / CitiDirect Mobile App

We collect your personal and non-personal information through your use of CitiDirect online banking / CitiDirect Mobile App.

We collect personal information that you voluntarily provide to us through CitiDirect / CitiDirect Mobile App, including:

- Name (only applicable to CitiDirect online banking)
- Contact: including address, phone number and email address (only applicable to CitiDirect online banking)
- Security code, zip code, electronic code, security question, password or other authentication information
- Information you provide when contacting or responding to us

We may automatically collect your following personal information through your use of our online banking services:

- Your IP address and location data
- **Your mobile device identification information: GUID for iOS device, and UUID for Android device (only applicable to CitiDirect Mobile App)**

We may also automatically collect the following non-personal, aggregated, unidentified or anonymous information related to your use of CitiDirect online banking / CitiDirect Mobile App:

- Date and time when Citigroup browses to visit our server (only applicable to CitiDirect online banking)
- Non-personal information about banking and other transactions
- Operating system version of your device (only applicable to CitiDirect online banking)
- The version of CitiDirect Mobile you are using (only applicable to CitiDirect Mobile App)
- The type of your phone's operating system (only applicable to CitiDirect Mobile App)

#### 1.2 How we use the information collected by CitiDirect online banking / CitiDirect Mobile App

Personal information collected through CitiDirect online banking / CitiDirect Mobile App is managed by Citi business unit, which maintains your account usage or processes your application for a new product or service. Information collected via online banking will be used in accordance with this Policy and the applicable privacy terms to the Citi business and services you use.

We use personal information collected online for the following purposes:

- Verify your user identity to allow your account access to CitiDirect online banking / CitiDirect Mobile App
- Perform 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

- For risk assessment, statistical, trend analysis and planning purposes in the context of administering, managing, monitoring and improving our own businesses
- Monitor and record calls and electronic communications with you for quality, training, investigation and fraud prevention purposes

2. Information collected by CitiDirect / CitiDirect Mobile may be used for internal audit, data analysis and research to improve our products or services.

If we use the information for other purposes which are not stated in this Policy, we will seek your consent in advance.

If we use the information collected for a specific purpose for other purposes, we will seek your consent in advance.

3. Information collected by CitiDirect / CitiDirect Mobile is the minimum information required to allow users securely using the system. If you are not providing such information, your CitiDirect / CitiDirect Mobile users will not function.

## **2. How we use cookies and similar technologies**

### (1) Cookie

To ensure the proper operation of CitiDirect online banking and CitiDirect Mobile App, we store pieces of information called Cookie in your computer or mobile device. Cookies usually contain an identifier, a site name, and some numbers and characters. With the help of cookies, data such as your preferences could be stored.

We do not use cookies for any purpose other than those stated in this Policy. You can manage or delete cookies based on your preferences. Please refer to the link <http://optout.networkadvertising.org/> for more information. However, if you decide to delete certain cookies stored on your computer or mobile device, your site experience may be degraded and you may not be able to use some of online features, especially the security and fraud monitoring features of cookies.

### (2) Website beacons and pixel tags

In addition to cookies, we may use similar technology as beacons and pixel tags in online banking or mobile banking to collect your browser, mobile devices and other information such as web browsing time, pages visited, language preferences, and other interacting data from Citigroup sites. This part of data may be associated with your terminal device information (e.g IP address, installation fonts, language and browser settings, time zone, and etc.) to facilitate our understanding on your preference of Citi products or services and improve our customer service.

### (3) Do Not Track

Many website browsers provide a Do Not Track function that can send a signal to the websites you visit to indicate you do not wish to be tracked. Up to now, major Internet standardization organizations have not established policies to specify how websites should handle these

requests.. However, if you enable Do Not Track in your browser, all our websites will respect your selection.

### **3. How we share, transfer, and publicly disclose your personal information.**

#### (1) Sharing

In principle, we do not share your personal information with any company, organization or individuals, with the following exceptions:

1. Share upon your explicit consent: We will share your personal information with other parties after obtaining your explicit consent.
2. We may share your personal information to comply with laws and regulations or mandatory requirements from governmental authorities.
3. We may share your personal information with third-party partners for the following purposes:
  - Help us to provide the services you need
  - Help us to analyze and understand our service usage
  - Prevent fraud or other illegal acts
  - Comply with subpoenas, court orders or other legal requirements

#### (2) Transfer

We will not transfer your personal information to any company, organization or individuals except in the following cases:

1. Transfer upon your explicit consent: After obtaining your explicit consent, we will transfer your personal information to other parties;
2. In the case of mergers, acquisitions or bankruptcy liquidation, if it involves transfer of personal information, we will request the new company or organization, which holds your personal information, to be bound by this Policy. Otherwise we will ask the new company or organization to resolicit your authorization.

#### (3) Public disclosure

We will only publicly disclose your personal information under the following circumstances:

1. After obtaining your explicit consent;
2. Disclosure based on law: We may publicly disclose your personal information in the event of mandatory requirement of legal, legal procedure, litigation or governmental agencies.

### **4. How we protect your personal information**

(1) We have used industry-standard security measures to protect the personal information you provide to prevent unauthorized access, public disclosure, use, modification, damage or loss of data. We will take all reasonable and feasible action to protect your personal information. We use encryption to ensure data confidentiality; we will use trusted protection mechanisms to protect against malicious attacks; we deploy access control mechanisms to ensure that only authorized personnel have access to personal information; and we conduct security and privacy protection training courses to enhance employee awareness of the importance of protecting personal information.

(2) We will take all reasonable and feasible measures to ensure that no irrelevant personal information is collected. We will only retain your personal information for the five-year period required to achieve the purposes stated in this Policy, unless an extension of the retention period is required or permitted by law.

(3) The Internet is not an absolutely secure environment. Besides, email, instant message, and communication with other Citi users are not encrypted. We strongly recommend you not to send personal information in this way. Please use complex passwords to help us keep your account secure.

(4) The Internet environment is not 100% secure, and we will do our best to ensure or guarantee the security of any information you send to us. If our physical, technical, or administrative protection is damaged, which results in unauthorized access, public disclosure, alteration, or destruction of information and further impairs your legitimate right, we would undertake corresponding legal liabilities.

(5) In the occurrence of any personal information security incident, we will promptly notify you of the following in accordance with laws and regulations: basic information about the security incident and its potential impact, treatment measures we have taken or will take, suggestions about proactive defense and risk mitigation, remedial measures and etc. We will promptly let you know relevant situations of the incident by means of mail, letter, phone call, push notification and etc. We will issue announcement in a reasonable and effective manner when having difficulty in reaching out to each personal information subject.

Meanwhile, we will also report the handling status of personal information security incidents as required by regulatory authorities.

## **5. Your rights**

In accordance with China's relevant laws, regulations, standards, and the common practice of other countries and regions, we guarantee you the following rights of your personal information:

### **(1) Access to / Obtain your personal information**

You are authorized to access and thereby obtain the copy(ies) of your personal information, except for some circumstances stipulated by law and regulations. If you would like to exercise your right of data access, you could access it on your own by the following means:

Account Information - If you want to access, obtain or edit your profile information, change your password, add security information, you can visit CitiDirect at [www.citidirect.com/login](http://www.citidirect.com/login).

### **(2) Correct your personal information**

When you identify any error in your personal information by our process, you are entitled to require us to make the correction. You can raise a correction application by using the methods listed in "(1) Access to your personal information."

If you are unable to correct your personal information through the link above, you can contact your security manager or contact us by mailing User Administration Form.

### (3) Delete your personal information

Under the following circumstances, you can contact your company's security manager/authorized representative requesting us to delete your personal information:

1. If our processing of personal information violates any law or regulation
2. If we collect or use your personal information without your company's authorized representative/your consent
3. If our processing of personal information breaches our agreement with you.
4. If you no longer use our products or services,
5. If we no longer provide products or services to you

### (4) Responding to your above request

In order to ensure the security, you may need to provide a written request or other supporting to verify your identity. We may ask you to verify your identity before processing your request. We will respond to you within 30 days. If you are unsatisfied with services, you can also make complaints through the following channels:

Calling 800 820 1268 (fixed number from mainland China only); sending email to china.citSERVICE@citi.com.

You can also complain to relevant regulatory body of China government, Cyberspace Administration of China

Website: [www.cac.gov.cn](http://www.cac.gov.cn)

Contact address: CAC office, No.15, Fucheng Road, Haiding District, Beijing

Postcode: 100048

In the following situations, we will not be able to respond to your request as required by law or regulation:

1. Directly related to national security and national defense security
2. Directly related to public safety, public health, and major public interests
3. Directly related to criminal investigation, prosecution, trial and judgment execution.
4. There is sufficient evidence that you have subjective malice or abuse of rights.
5. Respond to your request which may result in serious damage to the legitimate rights and interests of you or other individuals or organizations
6. Involve trade secrets

## **6. How personal information is transferred globally.**

In principle, the personal information will be stored within the People's Republic of China (for the purpose of this Policy excluding Hong Kong, Macau and Taiwan, the "PRC"). However, as part of Citi's Global Group presence, we provide products and services through resources and servers located around the world. The personal information may, with your consent or other legal justifications, be transferred to, or accessed from our parent, affiliates and/or relevant service providers in offshore jurisdictions. Such personal information will be protected by confidentiality and security measures of us and of the recipients in accordance with applicable laws and regulations. Please see the table accessible at <https://www.citi.com.cn/html/cn/pdf/jgkhyw.pdf> for the name, contact information, and types of personal information to be transferred or accessed

from offshore, the processing measures and purposes as well as the method and procedure for you to exercise the rights against the overseas recipients. **According to the Personal Information Protection Law of the People's Republic of China, and related data protection laws, regulations and other binding regulatory documents and requirements (collectively, the "Data Protection Laws"), we will inform you of the overseas recipient's name and contact information, the purposes and means of processing, the categories of personal information to be processed, as well as the methods and procedures for you to exercise your rights as provided in Data Protection Laws over the overseas recipient, etc., and shall obtain your separate consent thereof. This Policy has informed you in this regard, and your acceptance to this Policy shall be deemed as your separate consent to such processing.**

#### **7. When we collect your sensitive personal information.**

For the purposes stated above, we may collect your sensitive personal information amongst other personal information. "Sensitive personal information" means personal or property data that, once leaked or illegally provided or misused, may harm personal or property safety and will easily lead to infringement of the personal reputation, human dignity, physical or psychological health, or discriminatory treatment. Sensitive personal information mainly includes ID certificate data (ID card, passport and etc.), personal biometrics recognition data, credit data, property data, transaction data, medical and health data, specific identity, financial account, individual location tracking etc. as well as any personal information of a minor under the age of 14. We collect your sensitive personal information strictly following the principle of minimum and necessity.

**According to Data Protection Laws, we will inform you of the purposes and methods of processing and other matters that need to be informed regarding your sensitive personal information collected by us, and seek your separate consent thereof. This Policy has informed you of our processing of your sensitive personal information, and your acceptance to this Policy shall be deemed as your separate consent to such processing.**

#### **8. How to update this Policy**

We may change this Policy from time to time

We will not undermine your rights entitled under this Policy without your explicit consent. We will post any changes and revisions of this Policy on this page.

For significant changes, we also provide more noticeable notices (including for certain services, we will send a notification via email stating the specific changes to this Policy).

Significant changes referred hereunder include but not limited to:

1. Major changes in our service model, such as the purpose of processing personal information, the type of personal information processed, the way in which personal information is used, etc.
2. Major changes in our ownership structure, organizational structure, etc. Owner changes caused by business adjustments, bankruptcy mergers, etc.
3. Changes in the main objects of personal information sharing, transfer or public disclosure
4. Major changes in your rights to participate in the processing of personal information and the way oft is exercising such rights.
5. Changes in the department, contact information and complaint channels responsible for personal information security.

6. Personal information security impact assessment report indicates that there is a high risk  
We will also archive the old version of this Policy for your reference.

#### **9. How to contact us**

800 820 1268 (Only for fixed phones in mainland China) to contact service representative of CitiService. Outside the country, please call +86 21 6860 4588. Customers may need to pay communication charges to telecom operators for such calls (charges are as set by respective telecom operators).

#### **10. Language**

These Terms and Conditions are written in both Chinese and English. In case of discrepancies, the Chinese version shall prevail.





隐私保护政策（“本政策”）仅适用于花旗银行（中国）有限公司（“花旗”或“我们”）的公司银行产品或服务。

最近更新日期：2024 年 4 月

如果您有任何疑问、意见或建议，请通过以下联系方式与我们联系：

电子邮件：[china.citisservice@citi.com](mailto:china.citisservice@citi.com)

注册地址：中国（上海）自由贸易试验区花园石桥路 33 号花旗集团大厦主楼 28 楼 01A 和 04 单元、29 楼、30 楼、33 楼 01 单元、34 楼和 35 楼

电话：800 820 1268 (限中国大陆固话拨打) 与花旗电话银行的服务专员联系。境外请拨打 +86 21 6860 4588 客户将由此向通讯运营商支付可能发生的通讯费用(此通讯费用的收费标准由通讯运营商制定)。

本政策将帮助您了解以下内容：

- 1、我们如何收集和使用您的个人信息
- 2、我们如何使用 Cookie 和同类技术
- 3、我们如何共享、转让、公开披露您的个人信息
- 4、我们如何保护您的个人信息
- 5、您的权利
- 6、您的个人信息如何在全球范围转移
- 7、**我们何时收集您的敏感个人信息**
- 8、本政策如何更新
- 9、如何联系我们

我们深知个人信息（如下文定义）对您的重要性，并会尽全力保护您的个人信息安全可靠。我们致力于维持您对我们的信任，恪守以下原则，保护您的个人信息：权责一致原则、目的明确原则、选择同意原则、最少够用原则、确保安全原则、主体参与原则、公开透明原则等。同时，我们承诺，我们将按业界成熟的安全标准，采取相应的安全保护措施来保护您的个人信息。

请在使用我们的产品（或服务）前，仔细阅读并了解本政策。**特别是，本政策已告知您就敏感个人信息（如下文定义）的处理及个人信息跨境传输，一旦您接受本政策或被视为如此，您将被视为已对每次处理均作出单独同意。**

## 一、我们如何收集和使用您的个人信息

个人信息是指以电子或者其他方式记录的与您作为已识别或者可识别的人士有关的各种信息，不包括匿名化处理后的信息。

我们仅会出于本政策所述的以下目的，收集和使用您的个人信息：

### 1.1 CitiDirect 网上银行/CitiDirect 手机银行收集的信息

我们通过您使用 CitiDirect 网上银行收集您的个人信息和非个人信息。

我们收集您通过 CitiDirect 网上银行/CitiDirect 手机银行自愿向我们提供的个人信息，包括：

- 姓名（适用于 CitiDirect 网上银行）
- 联系方式：包括地址、电话号码和电子邮箱地址（适用于 CitiDirect 网上银行）

- 安全码、邮政编码、电子码、安全保护问题、密码或其他身份验证信息
- 您在联系和回复我们时所提供的信息

通过您使用 CitiDirect 网上银行/CitiDirect 手机银行，我们可能自动收集下列个人信息：

- 您的 IP 地址及位置信息
- 您使用的移动设备的标识信息，包括：iOS 设备的 GUID，以及安卓设备的 UUID 信息（适用于 CitiDirect 手机银行）

我们还可能自动收集与您使用 CitiDirect 网上银行/CitiDirect 手机银行相关的下列非个人信息、聚合信息、无身份识别信息或匿名信息：

- 花旗网页浏览访问我们服务器的日期和时间（适用于 CitiDirect 网上银行）
- 关于银行业务和其他交易的非个人信息
- 您电脑的运行系统类型（适用于 CitiDirect 网上银行）
- 您正在使用的 CitiDirect 手机银行的版本（适用于 CitiDirect 手机银行）
- 你的网络服务提供商或移动供应商（适用于 CitiDirect 手机银行）

## 1.2 我们如何使用 CitiDirect 网上银行/CitiDirect 手机银行收集的信息

通过 CitiDirect 网上银行/CitiDirect 手机银行所收集的个人信息由维持您的账户使用或处理您的一项新产品或服务申请的花旗业务部门所管理。经由 CitiDirect 网上银行/CitiDirect 手机银行收集的信息将会依照本政策以及适用于您所使用的花旗银行业务和服务的隐私政策的条款使用。

我们为以下目的使用网上收集的个人信息：

- 核实您的用户身份，以实现您在 CitiDirect 网上银行/CitiDirect 手机银行上的账户访问
- 履行世界各地适用法律法规（包括反洗钱和反恐法律法规）赋予我们的义务，与法院和其他裁判机构合作，与国内和国际监管机构、检控机关和其他政府当局合作，并采取措施打击欺诈和其他罪行；
- 在治理、管理、监控及改善我们业务的过程中进行风险评估、统计、趋势分析及规划；以及
- 监控和记录与您的电话和电子通信，以用于质量、培训、调查和预防欺诈的目的。

2. CitiDirect 网上银行或 CitiDirect 手机银行收集的信息，将有可能用于开展内部审计、数据分析和研究，改善我们的产品或服务

当我们要将信息用于本政策未载明的其它用途时，会事先征求您的同意。

当我们要将基于特定目的收集而来的信息用于其他目的时，会事先征求您的同意。

3. CitiDirect 网上银行或 CitiDirect 手机银行收集的信息均为安全使用网银的必要信息，若您不提供相关信息您的网银用户将不能正常使用。

## 二、我们如何使用 Cookie 和同类技术

### （一）Cookie

为确保 CitiDirect 网上银行/CitiDirect 手机银行正常运转，我们会在您的计算机或移动设备上存储名为 Cookie 的小数据文件。Cookie 通常包含标识符、站点名称以及一些号码和字符。借助于 Cookie，能够存储您的偏好等数据。

我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除

Cookie。有关详情，请参见链接 <http://optout.networkadvertising.org/>。如果您决定清除计算机或

移动设备上保存的某些 Cookie，您的网站体验可能会受限，您可能不能使用一些网上功能，尤其 cookie 在安全以及欺诈监控方面的功能。

### （二）网站信标和像素标签

除了 Cookie 外，我们可能会在 CitiDirect 网上银行或者 CitiDirect 手机银行中使用信标和像素标签等同类技术收集您的浏览器，移动设备及其他信息，例如网页浏览时间，网页访问记录，语言习惯，以及其他与花旗站点的交互数据。这部分数据可能会关联您的终端设备信息（例如：IP 地址，安装字体，语言及浏览器设置，时区等），以帮助我们了解您的产品或服务偏好并改善客户服务。

### （三）Do Not Track（请勿追踪）

很多网络浏览器均设有 Do Not Track 功能，该功能可向网站发布 Do Not Track 请求。目前，主要互联网标准组织尚未设立相关政策来规定网站应如何应对此类请求。但如果您的浏览器启用了 Do Not Track，那么我们的所有网站都会尊重您的选择。

## 三、我们如何共享、转让、公开披露您的个人信息

### （一）共享

原则上，我们不会与任何公司、组织和个人分享您的个人信息，但以下情况除外：

- 1、在获取明确同意的情况下共享：获得您的明确同意后，我们会与其他方共享您的个人信息。
- 2、我们可能会根据法律法规规定，或按政府主管部门的强制性要求，对外共享您的个人信息。
- 3、我们可能为以下目的与第三方合作伙伴共享您的个人信息：

帮助我们提供您所需求的服务

帮助我们分析和理解我们的服务使用

防止欺诈或其他违法行为

遵守法院传票、法院命令或其他法律要求

### （二）转让

我们不会将您的个人信息转让给任何公司、组织和个人，但以下情况除外：

- 1、在获取明确同意的情况下转让：获得您的明确同意后，我们会向其他方转让您的个人信息；
- 2、在涉及合并、收购或破产清算时，如涉及到个人信息转让，我们会在要求新的持有您个人信息的公司、组织继续受本政策的约束，否则我们将要求该公司、组织重新向您征求授权同意。

### （三）公开披露

我们仅会在以下情况下，公开披露您的个人信息：

- 1、获得您明确同意后；
- 2、基于法律的披露：在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的个人信息。

## 四、我们如何保护您的个人信息

（一）我们已使用符合业界标准的安全防护措施保护您提供的个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施，保护您的个人信息。我们同时对花旗网站提供 https 安全浏览方式；我们会使用加密技术确保数据的保密性；我们会使用受信赖的保护机制防止数据遭到恶意攻击；我们会部署访问控制机制，确保只有授权人员才可访问个人信息；以及我们会举办安全和隐私保护培训课程，加强员工对于保护个人信息重要性的认识。

（二）我们会采取一切合理可行的措施，确保未收集无关的个人信息。我们只会达成本政策所

述目的所需的 5 年期限内保留您的个人信息，除非需要延长保留期或受到法律的允许。

(三) 互联网并非绝对安全的环境，而且电子邮件、即时通讯、及与其他花旗用户的交流方式并未加密，我们强烈建议您不要通过此类方式发送个人信息。请使用复杂密码，协助我们保证您的账号安全。

(四) 互联网环境并非百分之百安全，我们将尽力确保或担保您发送给我们的任何信息的安全性。如果我们的物理、技术、或管理防护设施遭到破坏，导致信息被非授权访问、公开披露、篡改、或毁坏，导致您的合法权益受损，我们将承担相应的法律责任。

(五) 在不幸发生个人信息安全事件后，我们将按照法律法规的要求，及时向您告知：安全事件的基本情况 and 可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。

同时，我们还将按照监管部门要求，主动上报个人信息安全事件的处置情况。

## 五、您的权利

按照中国相关的法律、法规、标准，以及其他国家、地区的通行做法，我们保障您对自己的个人信息行使以下权利：

### (一) 访问、获取您的个人信息

您有权访问、并获取您的个人信息的副本，法律法规规定的例外情况除外。如果您想行使数据访问权，可以通过以下方式自行访问、获取：

账户信息——如果您希望访问、编辑、获取您的账户中的个人资料信息、更改您的密码、添加安全信息等，您可以通过访问 CitiDirect [www.citidirect.com/login](http://www.citidirect.com/login) 执行此类操作。

### (二) 更正您的个人信息

当您发现我们处理的关于您的个人信息有错误时，您有权要求我们做出更正。您可以通过“（一）访问您的个人信息”中罗列的方式提出更正申请。

如果您无法通过上述链接更正这些个人信息，您可以联系贵公司的安全经理或邮寄您的用户管理表格进行更正。

### (三) 删除您的个人信息

在以下情形中，您可以通过公司安全经理/授权代表向我们提出删除个人信息的请求：

- 1、如果我们处理个人信息的行为违反法律法规
- 2、如果我们收集、使用您的个人信息，却未征得公司授权代表/您的同意
- 3、如果我们处理个人信息的行为违反了与您的约定
- 4、如果您不再使用我们的产品或服务
- 5、如果我们不再为您提供产品或服务

### (四) 响应您的上述请求

为保障安全，您可能需要提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。

我们将在 30 天内做出答复。如您不满意，还可以通过以下途径投诉：

800 820 1268(限中国大陆固话拨打)发送电子邮件至 [china.citIService@citi.com](mailto:china.citIService@citi.com)。

您亦可依据有关法律法规向中国主管个人信息保护的政府机关进行投诉，即，

中华人民共和国国家互联网信息办公室

网址：[www.cac.gov.cn](http://www.cac.gov.cn)

联系地址：北京市海淀区阜成路 15 号国家互联网信息办公室

邮编：100048

在以下情形中，按照法律法规要求，我们将无法响应您的请求：

- 1、与国家安全、国防安全直接相关的
- 2、与公共安全、公共卫生、重大公共利益直接相关的
- 3、与犯罪侦查、起诉、审判和判决执行等直接相关的
- 4、有充分证据表明您存在主观恶意或滥用权利的
- 5、响应您的请求将导致您或其他个人、组织的合法权益受到严重损害的
- 6、涉及商业秘密的

## 六、您的个人信息如何在全球范围转移

原则上，我们将个人信息存储在中华人民共和国（为本政策之目的，不包括香港、澳门及台湾，下称“中国”）境内。但是，作为花旗全球集团的一部分，我们通过遍布全球的资源和服务提供产品或服务。为办理金融业务的需要，在获得您的同意后或在法律法规有明确规定的情况下，个人信息可能转移到我们的母行、关联机构及相关服务供应商所在的境外管辖区，或者受到来自这些管辖区的访问。该等个人信息将受到我们和接收方根据适用法律法规所采取的保密和安全措施的保护。请参阅本隐私政策所附的境外接收方列表境外接收方的名称、联系方式、出境数据的种类、方式及目的、您行使个人信息主体权利的方式及程序请见

<https://www.citi.com.cn/html/cn/pdf/jgkhyw.pdf>。根据《中华人民共和国个人信息保护法》和相关数据保护法律、法规以及其他具有约束力的规范性文件和要求（统称为“数据保护法律”），我们将告知您境外接收方的名称或者姓名、联系方式、处理目的、处理方式、个人信息的种类以及您向境外接收方行使数据保护法律规定权利的方式和程序等事项，并取得您的单独同意。本政策已告知您我们由此对个人信息的处理，您对本政策的接受将被视为您对此类处理的单独同意。

## 七、我们何时收集您的敏感个人信息

出于前述所述目的，我们可能会收集其他个人信息以外的您的敏感个人信息。“敏感个人信息”是指一旦泄露、非法提供或使用可能损害人身或财产安全并容易导致个人声誉、人格尊严、身心健康受到损害或歧视性待遇的个人或财产信息。敏感个人信息主要包括身份证件信息（身份证、护照等）、个人生物识别信息、信用信息、财产信息、交易信息、医疗健康信息、特定身份、金融账户、个人行踪轨迹等信息，以及不满十四周岁未成年人的任何个人信息。我们严格按照最小必要原则收集您的敏感个人信息。根据数据保护法律，我们将告知您我们处理您的敏感个人信息的目的和方法以及其他需要告知的事项，并据此寻求您的单独同意。本政策已告知您我们对于您的敏感个人信息的处理，您对本政策的接受将被视为您对此类处理的单独同意。

## 八、本政策如何更新

本政策可能变更。

未经您明确同意，我们不会削减您按照本政策所应享有的权利。我们会在本页面上发布对本政策所做的任何变更。

对于重大变更，我们还会提供更为显著的通知（包括对于某些服务，我们会通过电子邮件发送通知，说明本政策的具体变更内容）。

本政策所指的重大变更包括但不限于：

- 1、我们的服务模式发生重大变化，如处理个人信息的目的、处理的个人信息类型、个人信息的使用方式等
- 2、我们在所有权结构、组织架构等方面发生重大变化。如业务调整、破产并购等引起的所有者变更等
- 3、个人信息共享、转让或公开披露的主要对象发生变化
- 4、您参与个人信息处理方面的权利及其行使方式发生重大变化

5、我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化时

6、个人信息安全影响评估报告表明存在高风险时

我们还会将本政策的旧版本存档，供您查阅。

## **九、如何联系我们**

如果您对本政策有任何疑问、意见或建议，通过以下方式与我们联系：

800 820 1268 (限中国大陆固话拨打) 与您的花旗客户服务代表联系。境外请拨打+86 21 6860 4588。客户将由此向通讯运营商支付可能发生的通讯费用(此通讯费用的收费标准由通讯运营商制定)。