

Citi Commercial Card Privacy Statement - China

花旗银行商务卡隐私声明 — 中国

Citi commercial cards business provides commercial cards programs to corporations, financial institutions and public sector organizations (this Privacy Statement refers to each of these as the “Company”). This Privacy Statement explains how this business processes personal data about people with whom we come into contact (referred to as “you” in this Privacy Statement) in the course of our dealings with the Company and other relevant persons. This includes the Cardholders of the Company’s Commercial Card Program, as well as employees, officers, directors and other personnel of the Company, service providers and other business counterparties (referred to as “Your Organization” in this Privacy Statement).

花旗银行商务卡业务为公司、金融机构和公共部门组织（本隐私声明中均称为“公司”）提供商务卡项目。本隐私声明解释了银行在与公司和其他相关人员进行交易的过程中如何处理与银行联系的人员（在本隐私声明中称为“您”）的个人信息，该等人员包括公司商务卡项目中的持卡人，以及公司、服务提供商和其他业务相对方（在本隐私声明中称为“您的单位”）的员工、管理人员、董事和其他人员。

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

Citibank (China) Co., Ltd. (referred to as “we” in this Privacy Statement) is the controller of your personal data.

For further detail you may contact our Commercial Card Customer Service commercialcard.china@citi.com.

1. 谁对您的个人信息负责以及您如何联系他们？

花旗银行（中国）有限公司（在本隐私声明中称为“银行”）是您个人信息的控制者。

如需了解更多详细信息，请联系银行商务卡客服 commercialcard.china@citi.com。

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 a commercial cards program to the Company and Cardholders and to communicate with the Company and Cardholders about the program;
- to manage, administer and improve our business and Company and service provider engagements and relationships, for corporate marketing, business development and analysis purposes and to operate control and management information systems;
- to monitor and analyze the use of our commercial cards programs 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 the Company or others to do this; and
- to investigate, respond to and deal with complaints or incidents relating to us or our business, to maintain service quality and to train staff.

We also process your personal data to comply with laws and regulations. We sometimes go beyond 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

2. 银行为什么要处理您的个人信息？

出于以下原因，银行为开展业务和达成其他利益等目的，根据需要处理您的个人信息：

- 向公司和持卡人提供商务卡项目，并与公司和持卡人就该项目进行沟通；
- 为管理、进行和改善银行的业务和与客户和服务提供商的关系，以及用于企业营销、展业和分析目的；
- 为监测和分析银行商务卡项目的使用情况，以用于系统管理、操作、测试和支持等目的；
- 为管理银行的信息技术，并确保系统的安全；
- 为建立、行使和/或捍卫法律主张或权利，以及保护银行的财产或安全、行使和执行银行的权利，或协助公司或他人达此目的；及
- 为调查和回应与银行或银行业务相关的投诉或事件，为保持服务质量，并培训员工。

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, 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.

We rely on consent as the legal basis for processing your personal data, unless otherwise provided by applicable laws and regulation, in which case we may not rely on your consent to process your personal data. 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.

In order to provide you or Your Organization with more accurate, personalized, smooth and convenient services, or to help us evaluate, improve or design products, services and operational activities, to the extent permitted by applicable laws and regulations, we may de-identify or desensitize your personal data via technology means, and conduct comprehensive statistics, analysis and processing. We may use such de-identified data for various business purposes, but your personal data will not be disclosed as such data, which is not personal data, will not be able to be used to identify the data subject.

3. Services alerts

Cardholders will automatically receive service update alerts from us by post or email where contact details have been provided by the Company. You will be able to opt in to receive such alerts by SMS and to receive other alerts by email by registering with CitiManager, which is a service that allows you to access and view your card statements online. Please note that, if you register for such SMS alerts, then your telecoms provider may charge you to receive such alerts if you travel abroad; we are not responsible for any such charges. If you wish to change the alerts that you receive, please do so through CitiManager or call Customer Services on the number on the back of your card.

4. 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 and other organizations will also give us some personal data about you, including as set out below:

- from Your Organization: your date of birth, nationality, title and employee ID, contact details such as your business email address, home or business address and telephone number and other information required for KYC, AML and/or

银行还将根据法律和法规处理您的个人信息。有时银行将适用比相关法律或法规更加严格的要求，但仅在为追求银行的合法利益而与银行的监管机构和其他有权机关合作、遵守外国法律、防止或监测到金融和其他犯罪和违规行为，以及为保护银行的业务和金融市场的完整性时，其中包括出于以下原因处理您的个人信息：

- 为与政府、税务或监管机构、金融市场、或其他中介机构或交易对手、法院或其他第三方合作、回应其请求、向其报告交易和/或进行其他活动；
- 为风险评估和控制目的（包括发现、预防和调查欺诈）监测和分析银行产品和服务的应用；
- 为开展合规活动，如审计和报告、评估和管理风险、维护会计和税务记录、预防欺诈和反洗钱（AML），为采取与制裁和反恐法律法规以及打击犯罪有关的措施。这包括了解您的客户（KYC）筛查（包括身份检查、验证地址和联系方式）、政治人员筛查（作为客户尽职调查和建立客户关系的一部分，包括根据内部和外部数据库筛查客户记录，以建立与“政治人员”（PEPs）的联系）和制裁筛查（涉及根据公布的制裁名单筛查客户及其代表）；及

- 为记录和/或监控电话通话，以保持服务质量和安全；为员工培训和欺诈监控，并处理投诉、纠纷以及潜在的和/或实际的犯罪活动。在法律允许的范围内，这些录音为银行的专有财产。

银行依赖您的同意作为处理您的个人信息的法律依据，但在适用法律法规另有规定的情况下，银行可不依赖您的同意来处理您的个人信息。如果您未提供银行要求的信息，银行可能无法向您或您的单位提供（或继续提供）相关产品或服务，或将以其他方式与您或您的单位开展业务。

为向您或您的单位提供更加准确、个性、流畅及便捷的服务，或帮助银行评估、改善或设计产品、服务及运营活动等，在适用法律法规允许的范围内，银行可能通过技术手段对您的信息进行去标识化或脱敏处理，并进行综合统计、分析加工。银行可能将该等去标识化的信息用于各种业务用途，但由于该等信息无法识别信息主体，不属于个人信息，因而您的个人信息不会因此被泄露。

3. 服务提醒

如果公司向银行提供了您的联系方式，持卡人将通过短信或电子邮件自动收到银行的服务更新提醒。通过在 CitiManager 中注册，您可以选择通过 SMS 接收此提醒或通过电子邮件接收其他提醒，该服务可以让您在线访问和查看银行对账单。请注意，如果您注册了 SMS 提醒，当您出国旅行时，您的电信提供商可能会因您接收该提醒而向您收取费用；银行将不承担该等费用。如果您想更改提醒设置，请通过 CitiManager 或致电您的商务卡背面的客户服务热线进行更改。

4. 花旗从哪里获得有关您的个人信息？

sanctions checking purposes (e.g., a copy of your passport);

- from public sources: information collected from international sanctions lists, publically available websites, databases and other public data sources;
- from the Company and its program administrators: in the case of a Cardholder, the individuals who administer the commercial cards program on behalf of the Company, and/or the Company itself, may provide personal data relating to you, and submit change of personal data requests made by you on your behalf, to us, whether through use of an electronic card management and reporting system or otherwise. Such requests may be to update any of the information about you or your account set out in your application form, such as your name, address and email address. We may contact your manager or your program administrator about you and your account; and
- from merchants: in the case of a Cardholder, merchants which accept our commercial cards and accounts will transfer information to the relevant bank card association and to us about any transactions that you make with them using your card or account.

5. 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 and, if different, your employer, other members of the same group of companies, and authorized third parties, including, if you are a Cardholder, disclosure to program administrators and other individuals who are authorized by your Company about charges made and fees applied to your card or account, the status of your account and other data relating to your card and account, whether through use of an electronic card management and reporting system or otherwise, for the purpose of expense and travel management and administration;
- to other Citi entities (this includes the entities referenced at <http://www.citigroup.com/citi/about/countrypresence/>) for the purpose of managing Citi's Company, service provider and other business counterparty relationships;
- to persons from whom we receive, or to whom we make, payments on your or the Company's behalf;
- to service providers who provide services which are complementary to a commercial cards program, including application processing, fraud monitoring, call center and/or other customer services, card production and other technology and business process outsourcing services;
- to our professional service providers (eg, 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;
- to other persons, including merchants who accept our cards, where disclosure is required by law or to enable a commercial card program to be provided to you or the Company; and
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets.

If we share your personal data with above third-party(ies), we will request them via written agreement (if applicable) process the above information in accordance with

银行处理您直接提供给银行的，或者因您使用银行的系统以及银行与您和/或您的单位的通讯和其他往来中获取的个人信息。您的单位还将向银行提供一些关于您的个人信息，包括以下内容：

- 来自您的单位：您的出生日期、国籍、职位和员工 ID、联系方式（例如您的公司电子邮件地址、家庭或公司地址和电话号码）以及因 KYC, AML 和/或制裁检查目的所需的其他信息（例如您的护照复印件）；
- 来自公共来源：从国际制裁名单、公开网站、数据库和其他公共数据来源收集的信息；
- 来自公司及其项目管理员：对于持卡人，代表公司管理商务卡项目的个人和/或公司本身均可能提供与您有关的个人信息，并代表您向银行提出更改您个人信息的请求，无论是通过使用电子管理和报告系统还是其他方式。该等请求可能是为更新您在申请表中列出的有关您或您的账户的任何信息，例如您的姓名、地址和电子邮件地址。银行可能会就您和您的账户与您的经理或项目管理员联系；以及

- 来自商户：对于持卡人，接受银行商务卡和账户的商户将把有关您使用您的卡或账户与他们进行交易的信息转移给相关的银行卡组织和银行。

5. 银行向谁披露您的个人信息？

出于第 2 节规定的原因，银行向以下各方披露您的个人信息：

- 出于费用和差旅管理的目的，向您的单位以及（如果为不同的机构）您的雇主、同一集团公司的其他成员以及授权的第三方，包括（如果您是持卡人）通过电子卡管理和报告系统或其他方式向项目管理员和您单位授权的其他个人披露有关您的卡或账户的收费和费用、您的账户状态以及与您的卡和账户有关的其他信息；
- 为管理花旗的客户、服务提供商和其他业务相对方的关系向其他花旗实体（包括 <http://www.citigroup.com/citi/about/countrypresence/> 包含的实体）提供；
- 向代表您或公司收取或支付款项的人；
- 向提供商务卡项目服务的服务提供商（包括应用程序处理、欺诈监控、呼叫中心和/或其他客户服务、卡生产以及其他技术和业务流程外包服务商）提供；
- 向银行的专业服务提供商（如法律顾问、会计师、审计师、保险公司和税务顾问）提供；
- 向参与或准备诉讼的法律顾问、政府和执法部门以及其他人员提供；

applicable laws, regulations, personal information protection or privacy policy(ies) and other confidentiality and security requirements to safeguard your information security.

6. How do we protect your personal data?

We have used industry-standard security measures to protect the personal data 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 data.

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.

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.

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. We may publicize data security and personal information protection related compliance certificate(s) when we deem necessary.

7. 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 People's Republic of China (PRC), including countries which have different data protection standards to those which apply in the PRC. This includes transfers of personal data to Singapore, India and the United States of America. 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 PRC-approved standard data transfer agreements or other appropriate safeguards.

8. 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 the Company or Your Organization (if Your Organization is not the Company) or complying with a legal or regulatory obligation.

9. 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 opt out of the processing of your personal data for direct marketing purposes or object to our other 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 PRC law.

- 向任何司法辖区的主管监管、检察部门、税务或政府机构、法院或其他法庭提供;

- 向法律要求披露的或能够向您或公司提供商务卡项目的其他人(包括接受商务卡的商户)提供; 及

- 作为出售、合并或其他处置银行任何业务或资产的一部分, 向潜在买家提供。

如银行与上述第三方分享您的信息, 将会通过书面协议(如适用)要求他们按照适用的法律法规、个人信息保护或隐私政策以及其他保密和安全要求为银行处理上述信息以保障您的信息安全。

6. 银行如何保护您的个人信息

银行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。银行会采取一切合理可行的措施, 保护您的个人信息。

银行会采取一切合理可行的措施, 确保未收集无关的个人信息。银行只会在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法律允许。

如果银行的物理、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, 银行将承担相应的法律责任。

在不幸发生个人信息安全事件后, 银行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、银行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。银行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, 银行会采取合理、有效的方式发布公告。

同时, 银行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。银行可以在其认为必要时公开数据安全和个人信息保护相关的合规证明。

7. 您的个人信息将会传输到哪里?

银行可能会将您的个人信息传输到花旗实体、监管、检察机关、税务和政府机构、法院和其他法庭、服务提供商和其他位于中华人民共和国(中国)以外的国家/地区的业务相对方, 包括与中国适用不同数据保护标准的国家/地区。这包括向印度和美国传输个人信息。当银行将您的个人信息传输给这些国家/地区的花旗实体、服务提供商或其他业务相对方时, 银行将确保他们按照中国批准的标准数据传输协议(如有)或其他适当的保障措施保护您的个人信息。

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 6.) You can also complain to the relevant data protection authorities, in the PRC where you live or work or where the alleged infringement of data protection law occurred.

10. Changes to this Privacy Statement

This Privacy Statement takes effect on February 1, 2021; it was last updated on February 1, 2021. 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 and provide notice to the Company, who will further provide notice to you and obtain your consent.

8. 银行将保存您的个人信息多长时间？

为了维护银行与您和您的单位的关系、履行与客户或您的单位的协议或遵守法律或监管义务等相关目的，银行将在必要的时间限度内保存您的个人信息。

9. 您对于个人信息享有什么权利？

您可以要求银行：(i) 提供您的个人信息；(ii) 更正您的个人信息；(iii) 删除您的个人信息；或 (iv) 限制银行处理您的个人信息。您也可以选择不允许出于直接营销目的处理您的个人信息，或反对银行对于您的个人信息进行其他处理。在某些情况下，这些权利将受到限制，例如中国法律要求银行在该等情况下处理您的个人信息。

如需行使这些权利或您对银行如何处理您的个人信息有任何疑问，请使用第 1 节中的联系方式联系银行。银行可以特别提供第 6 节中提到的数据传输保障措施。您也可以向您居住、工作或涉嫌违反数据保护法的行为发生地的中国数据保护机构进行投诉。

10. 本隐私声明的变更

本隐私声明于 2021 年 2 月 1 日生效；它的最新更新时间为 2021 年 2 月 1 日。如果银行需对本隐私声明进行修改，将会在本网站发布该新版本并向公司发送相应通知，届时公司将依照《花旗银行商务卡协议》项下的要求向您发送通知并取得您的同意，使您可以及时了解银行处理您个人信息的相关内容。