

Citi Privacy Statement – China

花旗银行隐私声明-中国

Citi's businesses provide products and services to corporations, financial institutions and public sector organizations. This Privacy Statement explains how these businesses process personal data about people with whom we come into contact (referred to as "you" in this document) in the course of our dealings with such clients and other relevant persons. This includes employees, officers, directors, beneficial owners and other personnel of our clients, service providers and other business counterparties (referred to as "Your Organization" in this document).

花旗银行为公司、金融机构和公共部门组织提供产品和服务。本隐私声明解释了我行在与该等客户和其他相关人员开展业务过程中如何处理与我行接触的人员（下称为“您”）的个人信息，其包括我行客户、服务提供商和其他业务相对方（下称为“您的单位”）的员工、管理人员、董事、权益所有人和其他人员。

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

谁对您的个人信息负责以及您如何联系他们？

Citibank (China) Co., Ltd (referred to as "we" in this document) is the controller of your personal data.

花旗银行（中国）有限公司（下称为“我行”）是您个人信息的控制者。

For more details you can contact CitiService, No.33 Hua Yuan Shi Qiao Road, Lu Jia Zui Finance and Trade Area, Shanghai, P.R.China.

如需了解更多详细信息，您可以联系CitiService，地址为中华人民共和国上海市陆家嘴金融贸易区花园石桥路33号。

2. Why do we process your personal data?

我行为什么要处理您的个人信息？

We process your personal data, as necessary to pursue our legitimate business and other interests, for the following reasons:

出于以下原因，我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：

- to provide financial products and services to our clients and to communicate with you and/or our clients about them;
为客户提供金融产品和服务，并与您和/或我行的客户进行沟通；
- to manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes;
为管理、进行和改善我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；

- to monitor and analyze the use of our products to monitor and analyze the use of our products and services for system administration, operation, testing and support purposes;
为监测和分析我行的产品和服务以用于系统管理、操作、测试和支持等目的；
- to manage our information technology and to ensure the security of our systems;
为管理我行的信息技术，并确保系统的安全；
- to establish, exercise and/or defend legal claims or rights and to protect, exercise and enforce our rights, property or safety, or to assist our clients or others to do this; and
为建立、行使和/或捍卫法律主张或权利，以及保护我行的财产或安全、行使和执行我行的权利，或协助我行的客户或他人达此目的；及
- to investigate and respond to complaints or incidents relating to us or our business, to maintain service quality and to train staff to deal with complaints and disputes.
为调查和回应与我行或我行业务相关的投诉或事件，为保持服务质量，并培训员工处理投诉和纠纷。

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 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:

我行还将根据法律和法规处理您的个人信息。有时我行将适用比相关法律或法规更加严格的要求，但仅在为追求我行的合法利益而与我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，以及为保护我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：

- to cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries or counterparties, courts or other third parties;
为与政府、税务或监管机构、金融市场、经纪人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；
- to monitor and analyze the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud);
为风险评估和控制目的（包括发现、预防和调查欺诈）监测和分析我行产品和服务的应用；
- 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
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
- 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.
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，这些录音为我行的专有财产。

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.

我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，我行可不依赖您的同意来处理您的个人信息。如果您未提供我行要求的信息，我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。

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.

为向您或您的单位提供更加准确、个性、流畅及便捷的服务，或帮助我行评估、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，我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。我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. Where does Citi obtain personal data about you?

花旗银行在哪里获取您的个人信息？

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 will also give us some personal data about you. This may include your date of birth, title and job description, contact details such as your business email address, physical address and telephone number and other information required for KYC, AML and/or sanctions checking purposes (e.g., copies of your passport or a specimen of your signature). We also obtain some personal data about you from international sanctions lists, publically available websites, databases and other public data sources.

我行处理您直接提供给我行的，或者因您使用我行的系统以及我行与您和/或您的单位的通讯和其他往来中获取的个人信息。您的单位还将向我行提供一些关于您的个人信息，这些数据可能包括您的出生日期、职位和职位描述、联系方式，如您的企业电子邮件地址、实体地址和电话号以及 KYC、AML 和/或制裁检查所需的其他信息（例如，护照复印件或签名样本）。我行还将从国际制裁列表、公开网站、数据库和其他公共数据源获取一些关于您的个人信息。

4. To whom do we disclose your personal data?

我向谁披露您的个人信息？

We disclose your personal data, for the reasons set out in Section 2, as follows:

出于第2节规定的原因，我行向以下各方披露您的个人信息：

- to Your Organization in connection with the products and services that we provide to it if Your Organization is our client, or otherwise in connection with our dealings with Your Organization;
如您的单位是我行的客户或以其他方式与我行进行交易的，就我行向您的单位提供的产品和服务向您的单位提供；
- to other Citi entities (this includes the entities referenced at <http://www.citigroup.com/citi/about/countrypresence/>) for the purpose of managing Citi's client, service provider and other business counterparty relationships;
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；
- to counterparty banks, payment infrastructure providers and other persons from whom we receive, or to whom we make, payments on our clients' behalf;
向交易对手银行、支付基础设施提供商和我行代表客户与其进行收付款的其他人提供；
- to export credit agencies, multilateral agencies, development finance institutions, other financial institutions, governmental authorities and their agents, insurers, due diligence service providers and credit assessors, in each case in connection with the products and services that we provide to Your Organization if Your Organization is our client, including in connection with financings;
如果您的单位是我行的客户，就为您的单位提供的产品和服务（包括与融资相关的产品和服务）向出口信贷机构、多边机构、发展金融机构、其他金融机构、政府机构及其代理人、保险公司、尽职调查服务提供商和信用评估员提供；
- to service providers that provide application processing, fraud monitoring, call center and/or other customer services, hosting services and other technology and business process outsourcing services;
向提供应用程序处理、欺诈监测、呼叫中心和/或其他客户服务、托管服务和其他技术和业务流程外包服务的服务提供商提供；
- to our professional service providers (e.g., legal advisors, accountants, auditors, insurers and tax advisors);
向我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；
- to legal advisors, government and law enforcement authorities and other persons involved in, or contemplating, legal proceedings;
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；
- to competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction;
向任何司法管辖区的主管监管、检察部门、税务或政府机构、法院或其他法庭提供；
- to other persons where disclosure is required by law or to enable products and services to be provided to you or our clients; and
向法律要求披露的，或能够向您或我行的客户提供产品和服务的其他人提供；和
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets.
作为出售、合并或其他处置我行任何业务或资产的一部分，向潜在买家提供。

5. Where do we transfer your personal data?

您的个人信息将会传输到哪里？

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 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 (if any) or other appropriate safeguards.

我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。当我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，我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。

6. How long do we keep your personal data?

我行将保存您的个人信息多长时间？

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 a client or Your Organization or complying with a legal or regulatory obligation.

为了维护我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，我行将在必要的时间限度内保存您的个人信息。

7. What are your rights in relation to personal data?

您对于个人信息享有什么权利？

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.

您可以要求我行：(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) 限制我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，或反对我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，例如中国法律要求我行在该等情况下处理您的个人信息。

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 5. 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.

如需行使这些权利或您对我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我行。我行可以特别提供第5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。

8. Changes to this Privacy Statement

隐私声明的修改

This Privacy Statement takes effect on April 30, 2020; it was last updated on December 15, 2020. 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.

本隐私声明于 2020年4月30日生效,最新更新于2020年12月15日。如果我行更改此隐私声明，会将新版本发布到本网站，以便让您充分了解我行处理您的个人信息和相关事项。