

Circular relating to the Indonesian Personal Data Protection Law (“Circular”)

This Privacy Circular is intended to provide you with the essential information about the Law of the Republic of Indonesia No.27 of 2022 on Personal Data Protection (“PDP Law”) and has been prepared by Citi Private Bank (“Citi”) in connection with, and as required by, the PDP Law. I agree that my use or continued use of any of Citi’s services shall be deemed to be my consent, acceptance, and agreement to be bound by the provisions of this Circular.

Citi’s goal is to maintain the trust and confidence of all its customers and prospective customers in its handling of personal information.

All references in this Circular to “I”, “me”, “my”, “we”, “us” and “our” refer to the person(s) who opened or proposes to open an account with, or who has provided or proposes to provide a guarantee or third-party security to Citi. All references in this Circular to “Citi”, “you”, and “your” refer to Citi.

I agree that I will provide this Circular, and the information contained in this Circular, to the Relevant Individual (defined below).

Information Citi Collects and Uses

- a) From time to time, Citi may collect directly from me, from any person authorised by me in a manner approved by you, from third parties including the Relevant Individual (defined below) and from publicly available sources including credit bureaus the following information and data:
- i) personal information about me, my family members, my friends, my beneficiaries, my attorneys, my shareholders, my beneficial owners (if relevant), persons under any trust, trustees, partners, committee members, directors, officers or authorised signatories, guarantors, other security providers and other individuals (hereinafter, any natural person mentioned above, “**Relevant Individual**”), which may include names, identification particulars, contact details, products and services portfolio information, transaction patterns and behaviour, financial background, investment history, educational background and demographic data, including certifications about my assets and income from third parties such as my accountant;
 - ii) information and data generated in the ordinary course of the continuation of my banking/financial relationship with Citi, for example, during account reviews or when a Relevant Individual gives instructions, writes checks, transfers funds, deposits money, enters into a transaction or arranges banking/credit facilities for himself/ herself or for any third party or participation in contests or rewards programmes and other information and records, such as my preferences, my answers to questions intended for security verification and data I choose to provide; and
 - iii) information from cookies, or other technologies deployed for analysis of visits to websites or the use of any information technology application of Citi.
- b) I acknowledge that where I or a Relevant Individual fail to supply relevant information or data or withdraw consents in respect of use and/or disclosure of relevant information or data as described in this Circular, Citi may be unable to open or continue accounts, or establish or continue banking/credit facilities or provide banking/financial products/ services. Citi will inform me and/or the Relevant Individual of likely consequences where I or the Relevant Individual withdraw consent given or deemed to have been given.
- c) I warrant to Citi that where I or my representatives are responsible for the provision of any information or data relating to any Relevant Individual to Citi, or actually provide any such information or data to Citi, I have informed each Relevant Individual, delivered this Circular to the Relevant Individual, and obtained such Relevant Individual’s written or recorded consent, either electronically or manually in accordance with the requirements under the PDP Law, to Citi’s collection, use and disclosure of such information as described in this Circular, and that I will obtain such consent in advance of providing any similar information in the future.
- d) I agree that my information and data and/or the information and data of a Relevant Individual may be processed, kept, transferred or disclosed in and to any country/jurisdiction as Citi considers appropriate or necessary, in accordance and in compliance with the requirements under the PDP Law, including notification requirements to the governmental authorities (if applicable), for the purposes described below. Subject to the requirements under the PDP Law, such information and data may also be processed, kept, transferred or disclosed in accordance with the local practices and laws, rules and

regulations (including any regulatory requests, governmental acts and orders) in such country/jurisdiction.

- e) I acknowledge and provide my consent that Citi may collect, process and/or disclose relevant information or data in accordance with this Circular: i) as long as I use Citi's services including to open or continue accounts or to establish or continue banking/credit facilities or to provide banking/financial products/ services, or ii) until I withdraw my consents in writing. Such information and data may be retained according to the applicable laws and Citi's internal policy.

Purposes for which Information is Used and Disclosed

- f) I agree and consent that my information and data and/or the information and data of a Relevant Individual may be used and disclosed, including to places in or outside Indonesia for the following purposes (collectively "Permitted Purposes"):
- i) to make decisions relating to the opening or continuation of accounts and the establishment, provision or continuation of banking/credit facilities or banking/financial services including banking, investment, trust, insurance, credit card, personal loan, mortgage, auto loan, financial and wealth management products and services and otherwise maintaining accurate "know your customer" information and conducting anti-money laundering, credit and background checks;
 - ii) to provide, operate, process and administer my Citi accounts and services or to process applications for Citi accounts and services, any banking/financial transactions (including remittance transactions and credit/financial facilities), and to maintain service quality and train staff;
 - iii) to undertake activities related to the provision of the Citi accounts and services including the subscription or proposed subscription of products or services (whether offered or issued by Citi or otherwise) and the provision of research reports;
 - iv) to provide product related services and support, including, without limitation, provision of processing or administrative support or acting as an intermediary / nominee shareholder / agent in connection with your participation in various products (whether such products are offered or issued by Citi, Citi's affiliates, third parties or through other intermediaries or distributors);
 - v) to provide or grant access to product related materials such as offering documents, research reports, product profiles, fact sheets, term sheets or other product related materials;
 - vi) to fulfil foreign and domestic legal, regulatory and compliance requirements (including US anti-money laundering and tax obligations applicable to Citigroup Inc., including any of its affiliates and subsidiaries (collectively, "Citigroup") and disclosure to any stock exchange, court, authority or regulator pursuant to relevant guidelines, regulations, orders, guidance or requests from such authorities or organisations) and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to Citigroup;
 - vii) to verify my identity, the identity or authority of a Relevant Individual, my representatives who contact Citi or may be contacted by Citi and to carry out or respond to requests, questions or instructions from verified representatives or other parties pursuant to your then-current security procedures;
 - viii) for risk assessment, statistical, trend analysis and planning purposes, including to carry out data processing, statistical, credit, risk and anti-money laundering analyses, creating and maintaining credit scoring models, and otherwise ensuring ongoing credit worthiness of a Relevant Individual and/or myself, including conducting credit and other background checks and reviews, and maintaining the credit history of individuals (whether or not there exists any direct relationship between that Relevant Individual and Citi) for present and future reference;
 - ix) to monitor and record calls and electronic communications with myself and/or a Relevant Individual for record keeping, quality, training, investigation and fraud prevention purposes;
 - x) for crime and fraud detection, prevention, investigation and prosecution;
 - xi) to enforce (including without limitation collecting amounts outstanding) or defend the rights of Citi, its employees, officers and directors, contractual or otherwise;
 - xii) to perform internal management, to operate control and management information systems, and to carry out internal audits or enable the conduct of external audits;
 - xiii) to enable an actual or proposed assignee of Citi, or participant or sub-participant of Citi's rights in respect of me to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation
 - xiv) to comply with contractual arrangements by or between financial industry self-regulatory bodies, financial industry bodies, associations of financial services providers or other financial institutions, including assisting other financial institutions to conduct credit checks or collect debts;

- xv) to manage Citi's relationship with me, which may include providing information to me or a Relevant Individual, about Citi or Citi's affiliates products and services, where specifically consented to or where permissible under applicable laws and regulations;
 - xvi) for marketing financial, banking, credit, investment, trust, insurance, credit card, personal loan, mortgage, auto loan, financial and wealth management related products or services by various modes of communication including mail, telephone calls, SMS, fax, electronic mail, internet, market research, and designing or refining any similar products or services including by conducting market research, data analysis, and surveys;
 - xvii) to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Citigroup and any other use of data and information in accordance with any Citigroup-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
 - xviii) purposes relating directly thereto.
- g) In addition, I agree that my information and data and/or the information and data of a Relevant Individual may be disclosed, where permitted by applicable law, to the following entities (inside or outside Indonesia) for any relevant purpose which is part of the Permitted Purposes or for processing in accordance with any purpose described in the Permitted Purposes:
- i) any agent, contractor or third-party service provider who provides administrative, mailing, telemarketing, direct sales telecommunications, call centre, business process, travel, visas, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference or other background checks, custodian, depository, nominee or securities clearing or other services to Citi in connection with the operation of the business of Citi;
 - ii) any person or entity which is part of Citigroup although only to the extent necessary to fulfil the relevant Permitted Purpose;
 - iii) any drawee or drawer bank in connection with any cheque or equivalent;
 - iv) any financial institution, charge or credit card issuing companies, trustees, insurers, securities and investment services providers with whom I have or propose to have dealings;
 - v) credit reference agencies, credit information bureaus, and, in the event of default, debt collection agencies;
 - vi) any person or entity to whom a Citigroup entity is under an obligation or otherwise required to make disclosure pursuant to the legal process or under the requirements of any foreign or domestic law, regulation, court order or agreement entered into, binding on or applying to Citigroup, or agreement entered into by Citigroup and any government authority, domestic or foreign, or between or among any two or more domestic or foreign governmental authorities, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers or securities exchanges with which Citigroup is required or expected to comply, or any disclosure pursuant to any contractual or other commitment of Citigroup with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers, or securities exchanges, all of which may be within or outside Indonesia including disclosure to courts, tribunals, and/or legal, regulatory, tax and government authorities, whether such legal process, obligation, request, requirement, agreement or guidance may be existing currently or created in the future;
 - vii) any financial institution, processing agent, or any other person who will be involved in remittance transactions or any banking/financial activities;
 - viii) any actual or proposed assignee of Citi or participant or sub-participant or transferee of Citi's rights in respect of me or any other Relevant Individual, all or any part of the assets or business of Citi; and
 - ix) any party giving or proposing to give a guarantee or third-party security to guarantee or secure my obligations or those of any Relevant Individual.

Rights relating to Personal Data

- h) I acknowledge that Citi has informed me that, in accordance with the PDP Law, I and a Relevant Individual have the following rights in relation to our respective personal data.
 - i) the right to obtain information regarding identity clarity, the basis of legal interest, the purpose of requesting and using personal data, and accountability of parties requesting personal data;

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- ii) the right to complete, update and/or correct errors and/or inaccuracies in personal data regarding themselves in accordance with the purpose of personal data processing;
- iii) the right to access and obtain a copy of personal data regarding themselves in accordance with the provisions of laws and regulations;
- iv) the right to stop processing, deleting, and/or destroying personal data regarding themselves subject to applicable laws and regulations which may require Citi to process and/or retain such personal data;
- v) the right to withdraw consent for the processing of personal data regarding themselves that has been given to a personal data controller subject to applicable laws and regulations which may require Citi to process the personal data;
- vi) the right to object to a decision-making action that is based solely on automated processing, including profiling, which has legal consequences or has a significant impact on data subjects;
- vii) the right to delay or limit personal data processing proportionally for the purpose of personal data processing;
- viii) the right to receive compensation for violations of personal data processing regarding themselves in accordance with the provisions of laws and regulations; and

Eligibility

- i) I warrant that I or a Relevant Individual has the capacity and authority to provide any consent or approval under this Circular, and that this Circular represents their legal, valid, and binding obligations enforceable in accordance with its terms and the PDP Law. Neither I nor any Relevant Individual is considered a minor. Where the Relevant Individual is a minor, I warrant that the relevant guardian has given approval under this Circular on behalf of the minor.

Language

- j) This Circular is made in the Bahasa Indonesia and English languages. In the event of differences in interpretation between the Indonesian text and the English text, the English text shall be the reference text.

Inquiries

- k) Requests under the PDP Law, including complaints and requests for information regarding policies and practices and kinds of data held, and requests for exercising data subjects' rights such as requests for access to or correction of my personal information should be addressed to the Citi Client Enquiry & Investigation Centre in the relevant jurisdiction where your account is held e.g. as follows if my account is in Hong Kong with the Citibank, N.A., Hong Kong branch or if my account is held with the Citibank, N.A., Singapore branch, by post or email below:

Citibank N.A., Hong Kong 30/F., Champion Tower Garden Road, Central Hong Kong	or	Citibank N.A., Singapore 8 Marina View, #20-01 Asia Square Tower One, Singapore 018960	or	cpbclientenquiry@citi.com
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If you have any questions or requests in relation to this Circular, please contact your Private Banker or the Data Protection Officer/Representative/Advisor. The contact details for other client centers can be found in the applicable privacy statements at <https://www.privatebank.citibank.com/privacy>.

- l) I understand that Citi's Privacy Policy and privacy statements, available at <https://www.privatebank.citibank.com/privacy> contain further information about how I may make a request to access the information held by Citi about me and seek correction of such information, or make a privacy complaint and how Citi will deal with such a complaint.
- m) Where permissible by my account terms and conditions, I agree that Citi may amend and vary the terms of this Circular from time to time by notice or by making the updated version of this Circular available to you through your account or on our website.