



# KSA Personal Data Protection Law (PDPL) Information Notice

Citi Private Bank

Citi Global Wealth at Work

16 August 2024

This notice is intended to provide you with the essential information about the Kingdom of Saudi Arabia ("KSA") Personal Data Protection Law promulgated by Royal Decree No. M/19, dated 09/02/1443H on 24 September 2021 ( the "PDPL") and its Implementing Regulation and Regulation on Personal Data Transfer outside the KSA issued on 22/02/1445H (07/09/2023G) (together, the "Regulations"), as amended from time to time.

The PDPL and Regulations represent the first comprehensive data protection law in KSA. The PDPL came into effect on 14 September 2023, and will be binding following a one-year grace period as per the Hijri calendar (i.e. from 2 September 2024). Further information can be found at: <https://sdaia.gov.sa/en/Research/Pages/DataProtection.aspx>.

The provisions of this notice apply to, and should be read alongside, the Privacy Statement (EMEA) - Citi Private Bank / Citi Global Wealth at Work as amended from time to time (the "Privacy Statement") available on <https://www.privatebank.citibank.com/legacy/newcpb-media/media/documents/citi-private-bank-emea-privacy-statement-aw-web.pdf.coredownload.inline.pdf>.

Where there is a conflict or ambiguity between the Privacy Statement and this notice, this notice takes priority. The terms used in this notice have the same meaning as defined in the Privacy Statement.

## When does this notice apply to you?

It applies if you are resident in, or located in KSA while you receive services from data controller(s) established outside of KSA mentioned in the Privacy Statement, noting that this notice is supplemental to any applicable privacy statement(s), notice(s) or circular(s) available at <https://www.privatebank.citibank.com/privacy>.

When we refer to Citi, we mean the Citi entities that process your personal data. In almost all customer relationships Citi will act as an independent data controller. Exceptionally Citi will act as a data processor including in payment agency and similar agreements where we act only on your instructions and neither exercise any discretion nor process data for compliance with applicable law. This notice is applicable where we act as a controller unless otherwise indicated in a contract where we hold ourselves as a data processor.

## How can you contact us?

The contact details for the data controllers can be found in the applicable Privacy Statement. If you have any questions or requests in relation to this notice, please contact your Private Banker or the Data Protection Officer/Representative/Advisor as set out in the Privacy Statement.

## Why do we process your personal data?

For details on how we process your personal data, please refer to the Privacy Statement. In addition, we process your personal data for the reasons set out below, relying on the stated lawful bases of processing. Where we have cross-referred to purposes for processing set out in the underlying Privacy Statement, the associated lawful basis of processing set out in this notice will prevail. In some instances there may be more than one lawful basis for processing, although we have included only one lawful basis below/in the Privacy Statement. Should you require more information on potential additional lawful bases for processing, please contact us using the details set out in the Privacy Statement.

Purposes of Processing	Associated Lawful Basis of Processing
<ul style="list-style-type: none"> <li>To assess if investments are suitable or appropriate for you based on your investment knowledge and experience.</li> </ul>	Where necessary to implement our agreement with you.
The purposes for processing set out in the second row of the table at section 3 of the Privacy Statement (" <i>To disclose information to governmental entities or regulatory authorities, financial markets, brokers or other intermediaries or counterparties, courts or other parties...</i> "), and also, in addition: <ul style="list-style-type: none"> <li>To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity.</li> </ul>	Where we are required by applicable law.
The purposes for processing set out in the third row of the table at section 3 of the Privacy Statement (" <i>To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity</i> ").	Where necessary for our legitimate interests (as listed here) and where your interests and fundamental rights do not override these interests.

## Where do we obtain information about you?

For further information on how we obtain information about you, please refer to the Privacy Statement. In any case, we only obtain information about you from third parties when permitted under applicable law and in accordance with the PDPL's provisions.

## To whom do we disclose your personal data?

For details on how we disclose your personal data to others, please refer to the Privacy Statement.

In any case, we will disclose your personal data to third parties only when permitted under applicable law and in accordance with the PDPL's provisions.

## Where do we transfer your personal data?

We transfer your personal data to Citi Companies and to third parties (such as banks, security exchanges and financial or account service providers and other service providers) who are located both in the jurisdiction where you hold your account (or would hold an account if you are a prospective client) and outside that jurisdiction. This may include data being transferred by us, for the reasons outlined in the Privacy Statement and this notice, to Citi Companies and third parties outside KSA. We may also use cloud services providers to process your data under appropriate technology and operational security measures.

For transfers outside KSA to countries not providing adequate data protection based on the assessment of the competent regulator, in accordance with the Privacy Statement, PDPL and Regulations we proceed on the basis of valid exemptions within the meaning of the PDPL and Regulations, or we maintain physical, electronic and procedural safeguards, including data transfer agreements as required under the PDPL and Regulations within Citi or with the relevant third party, to protect your personal data. These mechanisms vary over time.

For further details on where we transfer your personal data, please refer to the Privacy Statement.

## What are your rights in relation to personal data?

For details on your rights in relation to personal data, please refer to the Privacy Statement.

If you wish to exercise these rights or if you have any queries about your personal data, please contact your Private Banker or the relevant Data Protection Officer/Representative/Advisor.

You also have the right to complain to the KSA data protection supervisory authority that regulates the collection of your personal data in KSA.

<b>Kingdom of Saudi Arabia</b>	<b>Saudi Data and AI Authority (SDAIA)</b>	Address: Digital City. Riyadh, 12382  Website: <a href="https://sdaia.gov.sa/ar/default.aspx">https://sdaia.gov.sa/ar/default.aspx</a>  Phone: (+966)8001221111
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