

## Citi APAC Mobile Challenge Privacy Policy

### **Privacy Statement**

**This Privacy Statement forms part of the legally binding terms (the “Terms”) that include the CITI Mobile Challenge (“Challenge”) Terms and Conditions as applicable between you (“You,” “Your,” “Yourself”), and Citibank N.A. (“Citi” “We,” “Us,” “Our”). This Privacy Statement provides information as to how We use Personal Information submitted in connection with the Challenge, whether through [www.citimobilechallenge.com](http://www.citimobilechallenge.com) (“Website”), as part of the registration process set out in the Challenge Terms and Conditions or as otherwise collected in relation to the Challenge or Website.**

**By clicking on the box to accept the Challenge Terms and Conditions, you also agree to this Privacy Statement and you give consent to (and if you are part of a Team, you give consent on behalf of your Team members to) the collection, storage, transmission, disclosure and use of Your Personal Information and the use of cookies as set out in the Terms.**

**As used herein, the term “Personal Information” means any identifiable information that relates to any applicant or participant in relation to the Challenge. Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Challenge Terms and Conditions.**

We invite You to see below to get answers to questions regarding this Privacy Statement.

### **1. What Personal Information is collected?**

Citi collects and may use certain Personal Information about You in order to operate and administer the Challenge and the Website and for other purposes set out in this Privacy Statement. If you decide to participate in the Challenge as described in the Challenge Terms and Conditions, You will be asked to provide certain information (“**Submission**”) and You may provide further Personal Information during the course of the Challenge. You are not legally required to provide any Personal Information to Us (and any Personal Information you provide is at your discretion), but You acknowledge that without this information, You may not be able to register for, or participate in, the Challenge. By making any Submission, You agree that We may collect other Personal Information about You, including, but not limited to, the following:

- a. further Personal Information that You may choose to provide when making a Submission or during the course of the Challenge. Please do not provide any sensitive Personal Information about You or any other person (including, without limitation, financial information, payment instrument details, social security numbers or other government issued identification numbers, passwords, information about an individual’s religious, confessional or similar beliefs, racial or ethnic origin, health or sexual life, genetic code, addictions, physical, physiological and mental health, sexual orientation, medical records, political affiliation or political party membership, trade union membership, information about criminal offences or proceedings for any committed or alleged criminal offence or any other categories of Personal Information defined as sensitive under applicable data protection laws, provided, however, that with respect to residents of India, any such information that is freely available or accessible in public domain or furnished under India’s Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive Personal Information);
- b. information about Your usage of the Website (e.g., the pages You request and visit);
- c. information obtained in the course of maintaining or supporting the Website; and
- d. information about Your Internet use, such as Your IP address, the URLs of sites from which You arrive or leave the Website, Your type of browser, Your operating system, Your internet service provider (ISP). We may also collect information about Your mobile provider and Your mobile device.

### **2. Which Citigroup entity controls my Personal Information?**

Your Personal Information will be controlled by Citibank N.A., whose principal place of business is 399 Park Avenue, New York, NY 10043 and/or the Citi entity which operates the particular Website You are accessing. A full list of Citi entities can be found [here](#). If You would like additional information regarding the applicable Citi entity or entities, please contact us at [developer@citi.com](mailto:developer@citi.com).

### **3. What are cookies and how are they used to collect Information?**

A cookie is a piece of data stored on Your hard drive containing information about You. There are certain strictly necessary cookies which are essential in order to enable You to move around the Website and use its features. Citi may use cookies on the Website to help recognize You when You return to the Website. Citi may also use cookies to compile statistics about usage of the Website and to help Citi improve the structure of the Website. Citi may also use the following types of cookies:

Functionality cookies: These cookies allow the Website to remember choices You make (such as your user name, language or the region you are in) and provide enhanced, more personal features.

Social media cookies: These cookies are used when you share information using a social media sharing button or “like” button on our Websites or when you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google +. The social networking websites will record that you have done this. This information may be linked to targeting/advertising activities.

We occasionally use other companies to set cookies on our websites and gather cookie information for us. In some cases, We will also use another company to operate web servers for our sites. We use the cookie information gathered by these companies in the same manner as stated above. The companies We use may not use these cookies for their own purposes or share the information gathered in connection with the cookies with others, in accordance with the terms of the contracts they have signed with us.

You have the ability to accept or decline cookies by modifying the settings in Your browser. However, You may not be able to use all the features of the Website if cookies are disabled.

#### **4. Does Citi collect non-personally identifiable information and what does Citi do with it?**

Citi collects certain non-personally identifiable information in connection with the Challenge, Your Submission and use of the Website. For example, Citi may collect click stream data, data on how You navigate the Website, and anonymous demographic information which We may use for website administration, analytics, market research, advertising and promotions or any other legitimate business use. We may share such information with various affiliated and unaffiliated entities for such purposes.

#### **5. How will my Personal Information be used?**

Any Personal Information collected in connection to the Challenge or through use of the Website will be available to Citi entities all over the world for any of Citi’s purposes set out the Terms (a full list of Citi entities that may access your Personal Information can be found here. Citi entities may use and disclose (and license others to use and disclose) such Personal Information in any and all media throughout the world: (i) for the purposes set out in this Privacy Statement and the Challenge Terms and Conditions, including for the purposes of administering the Challenge; (ii) in a reasonable manner for the purposes of the promotion, advertising, sale, publicizing and exploitation of the Submission, Challenge, future challenges and hackathons and Citi’s products and services; and (iii) as otherwise required in connection with Citi or its affiliated services, to the extent and for the duration permitted by applicable law.

In addition to other uses described herein, Citi will have access to and may use Personal Information collected in connection to the Challenge or through use of the Website for administering and managing and providing other services in relation to the Challenge and Website, including but not limited to:

- processing and facilitating your participation in the Challenge and the Website;
- enabling You to make Submissions;
- enabling Citi to communicate with You;
- customizing the service We provide to You and other users,
- providing You any services that may be available on the Website from time to time;
- monitoring compliance with the Terms and complying with applicable law or regulations and Citi policies; and

investigating any complaints or disputes about your application to, or participation in, the Challenge or Your use of the Website.

If You consent to be contacted by email by Citi entities or our sponsors, Citi entities or our sponsors (a list of sponsors can be found at [www.citimobilechallenge.com](http://www.citimobilechallenge.com) (as appropriate) may use Your relevant Personal Information to contact you by email with information, promotions or offers regarding upcoming events, products or services. To indicate Your consent You can opt-in to receiving such direct marketing by Citi entities and/or our sponsors when prompted at the end of the registration process.

Citi may also disclose Personal Information and any other information regarding the Challenge or Website in order to protect the legal rights, privacy, safety, security or legitimate interests of Citi, its affiliates, and each of their respective investors, directors, officers, employees, agents and suppliers. These instances may include, but are not limited to: protecting the safety and security of visitors to our websites or other properties; complying with Citi policies; enforcing the Terms; complying with the law or regulations, or responding to a subpoena or other process; responding to inquiries or requests from public authorities; permitting Citi to pursue available remedies or limit the damages that it may sustain; protecting against fraud, crime, illegal activity, anti-money laundering, anti-terrorism, or for risk management purposes; or otherwise in connection with legal, compliance, regulatory and investigative purposes.

If Citi appoints third parties to host, maintain, manage, or to provide other services in relation to the Challenge or Website, then the Personal Information relating to the Challenge or the Website may be accessed and used by these third parties to the extent necessary to fulfill their hosting, maintenance, managerial, and/or other functions. Where these third parties are located outside the country of your legal residence, we will ensure that they provide an adequate level of protection for your Personal Information consistent with the requirements of this Privacy Statement.

If We sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, We may transfer Your Personal Information to a third party as part of that transaction (and will seek your consent where required by applicable law).

Your Personal Information in relation to the Challenge and the Website will primarily be hosted in the United States. However, you understand and agree that the Website and any Personal Information relating to the Challenge or included on the Website may be hosted, maintained and accessed globally (including outside your country of legal residence and in the United States (“US”) and including in countries that may not have data protection laws). A full list of Citi entities that may access your Personal Information can be found here.

## **6. What about other websites?**

The Website may contain links to other websites. Please note that Citi is not responsible for the privacy or information security practices of other websites. You should carefully review the applicable privacy and information security policies and statements for any other websites to which you click through to via the Website. This Privacy Statement applies solely to Your Personal Information relating to the Challenge or collected by the Website.

## **7. Is the Personal Information collected about me secure?**

Citi uses reasonable physical, electronic, and procedural measures to safeguard information against loss, theft, and unauthorized use, disclosure, or modification. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while We strive to protect Your information, We cannot guarantee its security.

You are responsible for maintaining the secrecy of Your password, if any, and other Website registration or participation enrollment information, as applicable.

## **8. What happens when Citi changes this Privacy Statement?**

From time to time, We may revise this Privacy Statement. Changes may be made for any number of reasons, including to reflect industry initiatives, changes in the law, and changes to the scope of the Website, among other reasons. If your country requires you to reaccept any changes to this Privacy Statement in order for such changes to be enforceable, we will facilitate such approach.

**9. How long does Citi keep my Personal Information?**

Personal Information that You include in Your Submissions or otherwise provide in connection with the Challenge will be retained in accordance with applicable law and Citi’s own internal records requirements if any.

Citi will use reasonable efforts to notify You by email before deleting Your profile, Submission or other Submission information.

**10. Who can I contact about accessing, amending or deleting my Personal Information?**

In certain countries, consistent with applicable law, You may have certain rights with respect to the Personal Information which Citi holds about You regarding the Challenge or Website including the right to access, correct (and sometimes, object to or delete) the information. If You would like to request deletion of Your information subject to such rights, have questions or requests, would like to exercise other applicable rights under data protection law, wish to obtain a full list of the third parties to whom your information may be disclosed for the purposes set out in this Privacy Statement, or You no longer wish to receive information, promotions or offers regarding upcoming events, products or services marketing material, please contact Us at [developer@citi.com](mailto:developer@citi.com) so that We may guide you as to how to do this.

If You have any other questions concerning this Privacy Statement, You may submit them to Us at [developer@citi.com](mailto:developer@citi.com). Please do not send emails to Us for other purposes.