

## **Citi HK FinTech Challenge Privacy Policy**

### **Privacy Statement**

This Privacy Statement forms part of the legally binding terms (the “Terms”) that include the Citi HK FinTech Challenge (“Challenge”) Terms and Conditions as applicable between you (“You,” “Your,” “Yourself”), and Citibank (Hong Kong) Limited (“Citi” “We,” “Us,” “Our”). This Privacy Statement provides information as to how We use Personal Information submitted by You (or on Your behalf) or collected by Us in connection with the Challenge, whether through [www.hkfintechchallenge.com](http://www.hkfintechchallenge.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 information that relates to any applicant or participant in relation to the Challenge, from which the identity of that applicant or participant can directly or indirectly be ascertained. 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 your name, email address, age, residence, contact number and Facebook/LinkedIn Page URL (“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, including your image, voice, biography and origin;
- 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 (Hong Kong) Limited., whose principal place of business is Citi Tower, One Bay East, 83 Hoi Bun Road, Hong Kong. We operate the Website You are accessing.

### 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 Your 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 us for any of Citi’s purposes set out in the Terms. We 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 Challenge and hackathons and Citi's products and services; and (iii) as otherwise required in connection with the development, improvement,

management and marketing of Citi's products, services, processes and business methods, 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 Citi to communicate with You;
- 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.

Subject to Your consent (which includes an indication of no objection), Citi may use Your relevant Personal Information to contact You by email with information, promotions or offers regarding upcoming FinTech, financial services and technology events and/or banking and financial services, credit cards and related products or services. If You do not wish to receive such direct marketing from us, please tick the opt-out box when prompted at the end of the registration process. By not ticking the opt-out box at the end of the registration process, You consent to us using Your Personal Information in direct marketing. We are not permitted to use Your Personal Information for direct marketing purposes without Your consent. To opt-out from direct marketing at any time, please email [cfchk2017@citi.com](mailto:cfchk2017@citi.com).

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 of any jurisdiction binding on Citi, or responding to a subpoena, order or other process existing in any jurisdiction; responding to inquiries or requests from public authorities of any jurisdiction; 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 concerning any law or regulation of any jurisdiction applicable from time to time to Citi.

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 Hong Kong. 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).

#### 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 retention policy.

#### 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.

Under Hong Kong law, You have the right to request access to, or correction of, Your Personal Information. If You would like to exercise these rights, 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 [cfchk2017@citi.com](mailto:cfchk2017@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 [cfchk2017@citi.com](mailto:cfchk2017@citi.com). Please do not send emails to Us for other purposes.