

## Overseas Transfer of Personal Information

We transfer personal information overseas when it is necessary to entrust processing and storage to conclude and fulfill contracts with data subjects. Below are the details.

<b>Recipient of personal information (trustee)</b>	CSIPL Citicorp Services India Private Limited
<b>Countries and location to which information is transferred</b>	India (Mumbai, Chennai), China (Dalian)
<b>Recipient's intended use</b>	Supplier risk management process for third-party supplier contracts
<b>Transferred personal information</b>	Name, phone number, email address of person in charge from third-party supplier's side and address of the supplier
<b>Retention and usage period by the recipient</b>	Until the contract expiry
<b>Date and method of transfer</b>	When registered in GEP, data related to personal information, shall be stored on the GEP server and accessed from India and China
<b>Methods, procedures, and effects of refusal to transfer personal information</b>	Suppliers can refuse the transfer of personal information by refusing to register in the GEP system. However, after refusal, the supplier will not be able to both 1) participate in the supplier selection processes and 2) conclude a contract.
<b>Information management officer and contact information</b>	Esther Mclean : EO&T Info Sec Officer (+1-212-816-3079 // <a href="mailto:esther.s.lim@citi.com">esther.s.lim@citi.com</a> ) Kelly Debold : TPM Information Management Stuff (+1-636-261-5812 // <a href="mailto:kelly.debold@citi.com">kelly.debold@citi.com</a> )

<b>Recipient of personal information (trustee)</b>	Citibank N.A
<b>Countries and location to which information is transferred</b>	US (Delaware)
<b>Recipient's intended use</b>	Processing of corporate card information
<b>Transferred personal information</b>	Card holder's name, card number, account number, address, phone number, email address, transaction information, amount
<b>Retention and usage period by the recipient</b>	3.5 years from the date of delivery

<b>Date and method of transfer</b>	Transferring of personal information to the recipient's server in a batch file every business day.
<b>Methods, procedures, and effects of refusal to transfer personal information</b>	If the company to which the data subject provides personal information does not apply for the corporate card transaction history inquiry service or cancels the service, the information transfer will be suspended. As a result, the corporate card transaction history inquiry service will be unavailable.
<b>Information management officer and contact information</b>	Abilash Gangadharan : <a href="mailto:abilash.gangadharan@citi.com">abilash.gangadharan@citi.com</a>

<b>Recipient of personal information (trustee)</b>	Hexaware Technologies Ltd.
<b>Countries and location to which information is transferred</b>	India (Chennai)
<b>Recipient's intended use</b>	MIS and File delivery services for Commercial cards
<b>Transferred personal information</b>	Cardholder name, commercial card numbers, and transactional information with the amount for a trouble shooting purpose (name and card numbers are partial masked)
<b>Retention and usage period by the recipient</b>	Deleted within one business day from the date when the file names containing the transactional information are located
<b>Date and method of transfer</b>	Provided to the contact point of Hexaware via email upon client's request for the file containing the specific transactions.
<b>Methods, procedures, and effects of refusal to transfer personal information</b>	By requesting for hold on file delivery from the client, providing transactional information after the date of hold is discontinued. As a result, commercial card's transactional information will not be transmitted to the expense management system of the client.
<b>Information management officer and contact information</b>	Ms Uma Thomas, CRO/Hexaware Technologies : ( <a href="mailto:umathomas@hexaware.com">umathomas@hexaware.com</a> )