

CITI INC Privacy Policy

1. Information we collect

- a. CITI INC will collect, store, and process Information if you voluntarily provide such Information in connection with the following:
 1. filling in a form on any of our websites;
 2. contacting us by telephone or face to face, in person, or by telepresence (e.g. in the context of meetings);
 3. sending us a letter, e-mail, or social media message;
 4. requesting to receive a service from us (e.g. quotes, invoices, orders for products, or services or by following us on social media);
 5. access instructions and/or security credentials required for accessing systems and facilities relevant to the fulfillment of contractual obligations and/or ongoing service; and
 6. contributing content to us (e.g. any physical or digital information required for us to complete contractually obligated work or information otherwise presented voluntarily).
- b. CITI INC will collect, store, and process Information in connection with the following:
 1. contact information for persons such as names, addresses, email addresses, or telephone numbers;
 2. identifying information for facilities, such as names, addresses, or telephone numbers of facilities and/or personnel;
 3. technical information including, but not limited to, planned and current system specifications, telemetry configurations, and/or facility network configurations;
 4. customized software and digital files, including but not limited to, industrial PLC programs, SCADA programs, instrumentation configurations, telemetry hardware configurations, third-party software, firmware, and version information;
 5. information we receive about you from other third-parties involved in projects in which we may be involved or otherwise participate;
 6. information we deem essential for responding to emergency situations and cybersecurity related incidents; and
 7. information we deem essential for continuing to provide additional services to your or your affiliates in the future.

2. Use of Information

- a. As a provider of system integration services, we have a legitimate business interest in operating and improving our business and services.
- b. In order to better serve and meet your needs, we may use and store a wide variety of Information.
- c. Such Information is only shared with other members of CITI INC or our affiliate companies for the purpose of providing the services you request and to improve our ability to provide services in the future.
- d. We may use Information provided or collected from you for the following purposes:
 1. to provide services and products to you and your authorized affiliates;
 2. to provide repairs, maintenance, and emergency services to you and your authorized affiliates;
 3. facilitate scheduling of services relevant to ongoing contractual obligations;
 4. manage general record keeping;
 5. enable you to fulfill invoices and make payments;
 6. provide you with information, products, or services that you request from us;
 7. provide you with information about products or services that may be of interest to you;
 8. improve our products and services and to ensure that our products and services are of interest to you;
 9. make improvements to our websites and social media pages and ensure that content on these is presented in the most effective manner for you;
 10. assess and help us understand general trends and patterns relating to our business; and

11. when it is necessary to protect, exercise or defend our legal rights, and/or when we are required to do so by applicable law.
 - e. We may process your Information by both automated and manual means.
 - f. We may also use your Information in other ways for which we provide specific notice at the time of collection.
3. Sharing Information
 - a. We do not sell, disclose, or otherwise share Information we collect and hold about you except as described in this Privacy Policy.
 - b. We may share your Information with third parties as described below:
 1. other members of CITI INC or our affiliated companies, which may use this Information to offer products and services to you consistent with the purposes identified in this Privacy Policy;
 2. to our advisors and insurers in the event of a claim, dispute, or where otherwise necessary;
 3. in accordance with applicable law, we reserve the right to transfer your data in the event that we sell or transfer all or a portion of our business or assets; and
 4. if we are required to do so by law or pursuant to legal process or to comply with any applicable rules or regulations, or in response to a legitimate request from a law enforcement authority or other government official.
 4. Your rights
 - a. We will only send you marketing communications if you “opted in” to receiving such communications.
 - b. You have the right to “opt out” of receiving marketing communications at any time by clicking the unsubscribe link displayed in any of the marketing e-mails you receive.
 - c. To help protect your privacy and maintain security, we may take steps to verify your identity before we can action your request.
 5. How we protect your Information
 - a. We take the security of your Information seriously and take all commercially reasonable steps to ensure your Information is protected in alignment with applicable law and appropriately based on the sensitivity of the Information involved.
 - b. We maintain administrative, technical, and physical safeguards designed to protect the Information you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.
 - c. We advise our employees about their responsibility to protect customer Information and the importance of protecting this Information in alignment with this Privacy Policy.
 6. Data retention
 - a. We keep your Information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and legal/regulatory obligations.
 - b. Information may be retained by CITI for the purposes of quickly providing repair, maintenance, and/or emergency services.
 - c. We maintain the right to retain all software and solutions generated for our customers for the purposes of training and improving our products and services.
 7. Updates to our Privacy Policy
 - a. This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our processing of your personal data and our privacy practices.
 - b. The most up-to-date privacy policy will be made available on the CITI INC website.