



Citi Personal Wealth Management*

Privacy Notice

Our goal is to maintain your trust and confidence when handling personal information about you.

You Have Choices

As a Citi Personal Wealth Management* client at Citigroup Global Markets Inc., you have the opportunity to make choices about how personal information about you may be shared and used.

As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives.

Security of Personal Information

The security of personal information about you is our priority. We protect this information by maintaining physical, electronic and procedural safeguards that meet applicable law.

We train our employees in the proper handling of customer information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

* All references in this notice to Citi Personal Wealth Management include Citigroup Global Markets Inc. and its affiliated insurance agencies, such as Citigroup Life Agency LLC, unless otherwise advised by such agency. Citi Personal Wealth Management ("CPWM") is a business of Citigroup Inc., which offers securities through Citigroup Global Markets Inc. ("CGMI"), member SIPC. Insurance is offered through Citigroup Life Agency LLC ("CLA"). In California, Citigroup Life Agency LLC does business as Citigroup Life Insurance Agency, LLC (license number 0G56746). CGMI and CLA are affiliated companies under the common control of Citigroup Inc.

Inquiries and Information

Additional copies of this notice may be obtained from your Advisor. Questions about this notice may be directed to your Advisor.

If you wish to access and review your personal information from your account, please contact your Advisor. In response to your inquiry, your personal information for the account(s) listed in your request will be reported to you in writing (except when we are prohibited by law). If you believe that your personal information is incorrect, you should advise us in writing and we will promptly review your request, correct errors or, if we disagree, advise you and keep your statement for your file.

Your Privacy Choices

This section describes your privacy choices. Please remember that we will continue to protect personal information about you regardless of your privacy choices. If you are a customer of another Citigroup or Citigroup Global Markets Inc. affiliate or business and you receive its privacy notice, you should also review that privacy notice since you may need to separately notify that entity of your privacy choices.

If you complete and return the Privacy Choices form:**

- we will limit our disclosure of personal information about you to nonaffiliated third parties;
- we will limit what we share with our affiliates to what the law allows, which includes sharing any information about our transactions or experiences with you; and
- our affiliates marketing to you based upon personal information about you that we collect and share with them will be limited unless otherwise permitted by law, such as if you currently do business with one of our affiliates.

**Information for Vermont and California Clients.

In response to a **Vermont** regulation, if your account has a Vermont home address, your personal information will be treated by us as if you had chosen not to share such information without requiring you to complete and return the Privacy Choices form. And if we disclose personal information about you to nonaffiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.

In response to a **California** law, if your account has a California home address, your personal information will be treated by us as if you had chosen not to share such information with nonaffiliated third parties; further, such personal information will not be disclosed to nonaffiliated third parties except as permitted by applicable California law, and we will limit sharing such personal information with our affiliates to comply with California privacy laws that apply to us. To further limit sharing your personal information with and its marketing use by our affiliates as described in this notice, you can complete and return the Privacy Choices form.

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About This Notice

This notice tells you how we collect, handle and disclose personal information about you and how you can limit this disclosure. It also tells you how you may limit our affiliates from using certain information to market their products or services to you.

If you would like to limit our disclosure of this information, please return the Privacy Choices form that is part of this notice. If you are a joint account owner, we will accept instructions from any one of you and apply those instructions to the entire account. This notice applies to both current and former clients unless we state otherwise and is intended for individual clients who purchase products or receive services from us for personal, family or household purposes.

We may change this notice from time to time. If we do, we will notify you as required by applicable law.

Unless you request a change or you have been informed otherwise by us, any previous privacy choices you may have given us will remain in effect.

Personal Information We Collect and May Disclose

The personal information we collect about you comes from the following sources:

- **Information we receive from you**, such as your name, address, telephone number, social security number, occupation, assets and income
- **Information about your transactions**, such as your account balances, payment history and account activity
- **Information we receive from consumer reporting agencies and other sources**, such as your credit bureau reports, your credit score,

and other information relating to you and your creditworthiness

- **Information from other sources** such as your employer and other third parties.

We may disclose any of the above information that we collect to affiliates and nonaffiliated third parties as described in this notice.

The term "personal information," as used in this notice, means information that identifies you personally. We may use information that does not personally identify you to help manage our businesses and to provide better insight and understanding for us, our affiliates, and other companies regarding our business and the types of clients or markets we service. We may do this even if you ask us to limit disclosure of personal information about you, as described in the Privacy Choices form.

Affiliates to Whom We May Disclose Personal Information

Our affiliates are the family of companies controlled by Citigroup.

They include those doing business under the Citi name, such as Citibank, CitiCapital, CitiFinancial, Citi Private Bank, and CitiMortgage. We may share any personal information about you with affiliates in several different lines of business, including banking, consumer finance, insurance, securities and credit cards.

The law allows us to share with our affiliates any information about our transactions or experiences with you such as your account history, and also your name, address and telephone number. If you complete and return the Privacy Choices form included with this notice, unless otherwise permitted by law, we will not share other information about you that you have provided to us or that we may obtain from third parties such as information obtained

from credit bureaus. Further, federal law gives you the right to limit some, but not all marketing from our affiliates. You may limit our affiliates from marketing their products and services to you based upon personal information about you that we collect and share with them. This information may include your account history with us and your credit score. If you complete and return the Privacy Choices form included with this notice, we will tell our affiliates to limit their marketing to you based upon this information, unless otherwise permitted by law, such as if you currently do business with one of our affiliates.

Nonaffiliated Third Parties to Whom We May Disclose Personal Information

Nonaffiliated third parties are those not part of the family of companies controlled by Citigroup. We may disclose personal information about you to the following types of nonaffiliated third parties:

- Financial services providers, such as companies engaged in banking, credit cards, consumer finance, securities and insurance; and
- Non-financial organizations, such as companies engaged in offering new products or services.

If you complete and return the Privacy Choices form included with this notice, we will not disclose personal information about you to nonaffiliated third parties except as follows. First, we may disclose personal information about you as described above in "Personal Information We Collect and May Disclose" to third parties that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. Second, we may disclose personal information about you to third parties as permitted by law such as information necessary to service and process your account, to protect against fraud, and to protect the security or confidentiality of our records.

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PRIVACY CHOICES FORM

If you prefer that we limit disclosures of personal information about you, and to limit marketing offers by our affiliates, as described in this notice, please complete and return this form either in person or by mail to your Advisor or:

Citi Personal Wealth Management Service Center
111 Wall Street, 3rd Floor
New York, NY 10043

Our account records will then indicate the following preferences:

- *Limit the personal information about me that you disclose to nonaffiliated third parties*
- *Limit the personal information about me that you share with Citigroup affiliates*
- *Limit Citigroup affiliates from marketing to me using personal information about me that you share with them.*

In order for us to process your request, please provide the following information:

Citi Personal Wealth Management account number(s)

Name

Address

City/State/Zip Code

Signature

Date

Please allow approximately 30 days from our receipt of this form for your instructions to become effective. The privacy choices you make will apply until you tell us to make a change. If you already made any of these privacy choices with us you need not make that choice again. If you are also a customer of other Citigroup companies and you receive a notice of their intent to share certain information about you, you will need to separately notify them if you do not want them to share such information.

