



PRIVACY AND SECURITY POLICY

Last Review Date: May 31, 2018

PURPOSE AND CONTENTS

General

This document outlines the Privacy and Security Policy formalized and approved by the Board of Directors of **International Financial Enterprise Bank, Inc.** on **[Pending]**.

Effective Date

All employees of International Financial Enterprise Bank, Inc., referenced throughout this policy as the "Bank" or "IFEB", must comply with the terms of this policy immediately. Managers, employees and technical personnel must modify system configurations and procedures, if necessary, to comply with the terms of this policy within 30 days of the Board of Directors' approval of this document.

Privacy Policy

Thank you for your trust in IFEB. We are a values-based company and we strive to live those values every day. We know one of the reasons you have chosen IFEB is because you want to do business with a bank which shares your same values. Protecting your privacy is living these values.

One of the most important responsibilities we have is to protect your personal privacy and financial data. We take this very seriously. We do not sell or rent your personal information to anyone, for any reason. Your privacy is not for sale.

We gather customer information for two reasons. First, it is the law. Under the Bank Secrecy Act we are required to "Know your Customer"; also known as "KYC". Governments around the world want to ensure the banking system is not used for illegal purposes. These include activities such as money-laundering, funding terrorist activities, or buying of illegal merchandise such as a Tomahawk Missile. We fully understand these requirements and comply fully with law. We do not want IFEB accounts to be used for this reason.

Second, we want our communication with you to be timely and relevant. In today's digital and social-media driven world, individuals publicly share information about themselves. In return for sharing this information, individuals expect something in return. For IFEB, this means helping you navigate life making good financial decisions.

Privacy and Permission

IFEB understands the concerns about privacy and the frustration many consumers have about how their private personal information is being taken unknowingly. If we need access to your personal private information we will ask for your permission first. It should be your decision, not something taken from you.

Overview

This Privacy Policy explains how we protect personal information provided through our fTLD secure website www.ifeb.bank (the "Website") and our mobile application (the "App") and how

Main Office

The Hato Rey Center
268 Ponce de Leon Ave.
Suite 1012
San Juan, PR 00918

Compliance

2251 Vantage Street
Suite 400
Dallas, TX 75207

T. 214-739-2424

E. compliance@ifeb.bank
www.ifeb.bank

we use that information in connection with our services offered through either of these (the "Service"). This privacy policy delineates how IFEB handles personal information when users access our Services. Further policies may govern information concerning specific products accessed by our customers.

IFEB stresses its privacy and security standards to guard against identity theft and provide security for your personal information. We regularly re-evaluate our privacy and security policies and adapt them as necessary to deal with new challenges.

We update this Privacy Policy periodically. The date last revised appears at the top of the Policy. Changes take effect immediately upon posting.

All users who access our Services become users pursuant to IFEB's Privacy Policy and Terms of Use and thereby signify their acceptance of said policies and terms. If you have questions, comments, concerns or feedback regarding this Privacy Policy or any other privacy or security concern, send an e-mail to compliance@ifeb.bank.

Privacy Policy

"Personal information" for purposes of this Policy means information that identifies you. The types of personal information we collect depends on the product or service you have with us. This information can include but is not limited to: name, address, phone number, fax number or email address, social security number, tax identification number, personal assets, debt, transaction history, checking account information, account balances, account transactions, and wire transfer transactions.

We Limit Sharing of Personal Information

Federal Agencies: Federal regulations require the collection of certain nonpublic information without which IFEB services and products may not be available.

Third Party Service Providers: We will share your nonpublic information with certain third-party service providers as permitted and required by law in order to deliver our products and services to you. IFEB may use personal nonpublic information for reasons that include but are not limited to: account opening and validation; to comply with federal, state and local statutes; to process transactions; to send information to customer-related parties; to improve IFEB services; to protect the security and integrity of our businesses, properties, affiliates, and customers; and to respond to legitimate and legal requests from governmental authorities or in connection with other legal proceedings. Third party-service providers may include, but are not limited to, core system providers, custodians, transfer agents, customer selected charities, and accounting firms.

Use of Non-Personally Identifiable Information

Non-public, but non-personally identifiable information, regarding IFEB's current and potential customers, including but not limited to demographic, geographic, or aggregated customer information, can be used by IFEB for any purpose.

Information Security

The security of your personal information is important to us. As discussed below, we utilize physical, electronic and procedural security measures to protect against loss, misuse, and alteration of information under our control. We offer industry-standard practices and security measures to safeguard and secure the personal information we collect. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect IFEB accounts and systems from unauthorized access.

When you register for IFEB Services, IFEB requires a password from you for your privacy and security. IFEB transmits information such as your Registration Information or Account Credentials securely.

Our servers are in a secure facility. Access requires multiple levels of authentication. Security personnel monitor the system 7 days a week, 24 hours a day.

We employ controls to limit access to our databases to those employees or service providers with a business need to access them. We encrypt your account password and PIN so that your password cannot be recovered, even by us. All backup drives and tapes also are encrypted.

We use our reasonable best efforts to protect user information however no method of transmission or method of data storage is 100% secure. Despite our commercially reasonable efforts, we cannot assure that personally identifiable information that we collect will never be disclosed in a manner inconsistent with this policy.

Your use of the IFEB Services acknowledges that IFEB is not liable or responsible for any intercepted information and you hereby release IFEB from any and all claims arising out of or related to an unauthorized or inadvertent breach of data or violation of privacy policies.

Login ID, Password and Pin

From the time you submit your Login ID, Password and PIN, the communications between your device and IFEB are encrypted. This enables customer and server applications to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery.

You are responsible for keeping your Login ID, Password, Mobile Device, and Email Account Confidential

We maintain strict rules to help prevent others from guessing your password. We also recommend that you change your password periodically. Your password must be 8-23 characters in length. You are responsible for maintaining the security of your Login ID and Password. You may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at security@ifeb.bank but in any event, you should change your password immediately via the Service.

You also agree that you control and limit access to the email account and mobile device. If your email address or your mobile device changes, you are responsible for informing us of that change.

We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of this Privacy and Security Policy or the Terms of Use.

Customer-Generated Content Uploaded, Shared, Transmitted, or Otherwise Publicly Shared

IFEB is not responsible for any user information shared in public forums such as blogs, chats, videos or social media. IFEB retains full, irrevocable, royalty-free, worldwide sublicensable, and perpetual intellectual property rights around any user-generated content uploaded, shared, transmitted, or otherwise publicly disseminated on the IFEB site. IFEB can store, use, reproduce, modify, and adapt such content and will retain full rights to any derivative works or compilations of such content. Users warrant by their actions that they have the necessary rights to grant such licenses to IFEB. IFEB can further delete such content at any time and for any reason.

IFEB has no obligation to monitor or ability to control the information users publicly place on our Services. We do not endorse any opinion, recommendation, and information that is expressed in this fashion. By accessing the Services, users waive any rights or remedies against IFEB in relation to such data.

Tracking (cookies)

While you are on IFEB Services, and other websites, online ad networks we work with may place anonymous cookies on your computer, and use similar technologies, in order to understand your interests based on your anonymous online activities, and thus to tailor more relevant content to you. If you do not wish to receive such tailored content, you can go to the Network Advertising Initiative opt-out webpage (<http://optout.networkadvertising.org>) to opt out of most companies that engage in such advertising. This may not prevent you from seeing ads as the ads simply will not be delivered through these targeting methods.)

Change of Control

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change of control, reorganization, bankruptcy, or asset sale. If we sell, merge or transfer any part of our business, part of the sale may include your personal information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

Contact Information and Opt Out

Customers can unsubscribe from marketing and otherwise informational emails from IFEB and affiliated third parties utilizing your personal information, including your creditworthiness, on a forward-going basis by contacting IFEB at customerservice@ifeb.bank.

Please note, however, that IFEB customers cannot opt out of receiving administrative messages.

Any third party offering that our customers accede to will be governed by that party's privacy and commercial policies.

IFEB may, from time to time, recommend third-party service and product providers to its customers. In such cases, we will only share personally-identifiable customer information with said parties if our customers have provided consent and indicate an express interest in learning more.

IFEB is not geared toward anyone under the age of 18. We will endeavor to delete in a time and manner that is commercially reasonable personally identifiable information provided by minor children without their parent's or guardian's consent upon notification by said parent or guardian at compliance@ifeb.bank. We are not liable for the consequences of such information having been shared with IFEB.

IFEB is not responsible for the privacy, security, or information policies of third party links from or on the IFEB Services.

Privacy policies may change from time to time. Notification of such changes will occur on this page and/or in an email notification.

Please direct any questions to compliance@ifeb.bank or at 214-739-2424.