



SECURITY POLICY

Last Review Date: May 31, 2018

PURPOSE AND CONTENTS

General

This document outlines the Acceptable Use 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.

Security Policy

The security of your personal information is important to us. 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 are also 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.

Main Office

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San Juan, PR 00918

Compliance

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Suite 400
Dallas, TX 75207

T. 214-739-2424

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

A Secure Environment

SSL encryption: We enforce 256-bit encryption for our website.

Network security: Our network infrastructure enforces security at each level with strict routing, firewalls and controlled access.

Bank-level security: We use the same encryption standards as banks, perform routine security audits and have security supported by Verisign®.

Your Personal Information

Security of data: We have implemented systems to securely store and protect your data and restrict access to your information on a need-to-know basis. Any personally identifiable information, like your social security number and password, is stored encrypted.

Privacy: We will never sell or lease your information for any reason to anyone. For more details about how we honor your privacy, see our Privacy Policy.

Fraud Protection and Alerts

Fraud Protection and Alerts: We have automated and manual systems to identify and notify you of any suspicious activity. If you see any unrecognized activity in your account, please contact IFEB immediately at security@ifeb.bank or 214-739-2424.

Account Security Features: We proactively protect your account with automatic sign out, identity verification and detection of suspicious account access.

Multi-Factor Authentication: We use multi factor authentication that adds an extra layer of protection for account login. It requires the customer to provide evidence of knowledge (email, password) and possession (6 digits code sent to the customer's mobile phone (SMS) or customer's email account) to be granted access to the account.

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