

PRIVACY POLICY

Protecting the privacy of all of our customers is important to HBM Group and our employees. We want you to understand what information we collect and how we use it. In order to provide our customers with a broad range of financial products and services as effectively and conveniently as possible, we use technology to manage and maintain customer information. The following policy serves as a standard for all HBM Group employees for collection, use, retention, and security of nonpublic personal information about all of our customers, including consumers, businesses, governmental units, and nonprofit organizations. "Customer" means one who has a continuing relationship with HBM Group under which HBM Group provides one or more financial products or services to the customer. **What Information We Collect**

We may collect "nonpublic personal information" about you from the following sources: Information we receive from you on applications or other forms;

Information about your transactions with us or others;

Information we obtain from third parties, for example, when transferring accounts from other institutions where you conduct financial transactions.

"Nonpublic personal information"

is nonpublic information about you that we obtain in connection with providing a financial product or service to you. For example, nonpublic personal information includes information regarding your account balance, payment history, and transaction history.

What Information We Disclose

We may, and are permitted under law to, share information about our experiences or transactions with you or your account (such as your account balance and your payment history with us) with companies related to us by common control or ownership ("affiliates"). We are permitted under law to disclose nonpublic personal information about you to "non-affiliated third parties" (i.e., third parties that are not members of our corporate family) in certain circumstances. For example, we may disclose nonpublic personal information about you to government entities in response to subpoenas. We may also disclose nonpublic personal information about you to third parties to assist us in servicing your account with us. It is HBM Group's policy to require such non-affiliated third parties to agree to maintain confidentiality protections and to limit the use of information we provide to authorized purposes. We do not disclose any nonpublic personal information about you to anyone else without your authorization, except as permitted by law. If you decide to close your account(s) or become an inactive customer, we will continue to adhere to the privacy policies and practices described in this notice.

Our Security Procedures

We also take steps to safeguard customer information. We maintain policies that require restrictions on access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. Our policies provide that employees who violate these standards are subject to disciplinary measures. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

Cookies

There are two types of cookies:

- Hard disk cookies: A file that is downloaded to the hard drive on your computer.
- Session cookies: Used to reference information stored on bank servers. By using session cookies, no personal or confidential information is being stored on your computer. These session cookies are only good for the life of a browser session. When you close your browser, the session cookie is erased from the computer's memory completely.

The HBM Group web site uses only session cookies in the PAL (Portfolio Account Link) section of the web site. Browsers that support cookies include Microsoft Internet Explorer, Netscape Navigator, Mozilla Firefox and most other available Internet browsers. If your browser supports this function, you can enable the acceptance of cookies under the Internet Options category in Internet Explorer. In Netscape this option is found under the preferences category.

How Collected Information Is Used

HBM Group may use the data collected from e-mails to process your business and to provide you with information on our products, services and other opportunities. **Who Has Access To**

The Information

HBM Group uses a password system to limit the access to the collected information to only those employees who need the information to conduct bank business. HBM Group does not share information about our customers with other companies unless the law requires it. Except when the law requires it, HBM Group does not provide personal information, names, addresses, e-mail addresses or any other information to outside vendors. Any person accessing this information unlawfully will be prosecuted to the full extent of the law.

Confidential Information

Please do not send confidential information to us via e-mail. E-mail is not necessarily secure against interception. If your communication contains sensitive, personal or confidential information like account numbers, credit card numbers, or social security numbers, please call us or use a postal service instead.

If you have questions or concerns with this Privacy Notice or your privacy rights, please contact us: curacao@hbmgroup.com