



SAFRA NATIONAL BANK OF NEW YORK

PRIVACY NOTICE

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| FACTS | WHAT DOES SAFRA NATIONAL BANK OF NEW YORK (SNBNY)/ ACCESS LOANS PRODUCTS DO WITH YOUR PERSONAL INFORMATION? |
| Why? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and income • Account Balances • Transaction, credit and payment history • Account and employment information When you are no longer our customer, we continue to share your information as described in this notice. |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Safra National Bank of New York/Access Loans Products chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does SNBNY share? | Can you limit this sharing? |
|---|--------------------------|------------------------------------|
| For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes to offer our products and services to you | No | We don't share |
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes — information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes — information about your creditworthiness | No | We don't share |
| For our affiliates to market to you | No | We don't share |
| For nonaffiliates to market to you | No | We don't share |

Who we are

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| Who is providing this notice? | Safra National Bank of New York / Access Loans Products |
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What we do

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| How does Safra National Bank of New York protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Only Authorized employees of the Bank will have access to your non-public personal information for the performance of their job duties. |
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| <p>How does Safra National Bank of New York collect my personal information?</p> | <p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • apply for a loan or give us your income information • provide account information or give us your contact information • provide employment information • Use our website or make loan payments <p>We also collect your personal information from others , such as credit bureaus, affiliates, and other companies.</p> |
| <p>Why can't I limit all sharing?</p> | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

Definitions

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| <p>Joint marketing</p> | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • Our joint marketing partners may include financial institutions, such as marketers and other lending companies. |
| <p>Affiliates</p> | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies. Safra National Bank of New York, Safra Securities LLC, J. Safra Asset Management.</p> |
| <p>Non-affiliates</p> | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Safra National Bank of New York does not share with non-affiliates so they can market to you. |

Other Important Information

We may use your e-mail address to send you occasional updates about our products and services, our offers, and service notifications related to your account(s). You may decline to receive e-mail offers from us at any time. We do not share your e-mail address with other companies for them to market their products or services to you. When we hire vendors to deliver e-mails to you on our behalf, they cannot use your e-mail address for any other purpose. To make our e-mail offer more relevant to you, we may use information you provided in your initial transaction with us, in surveys, from information we have about you as a customer and information available from external sources such as census bureau data. When we send e-mail to you, we may be able to identify information about your e-mail address, such as whether you can view graphic-rich HTML e-mail. If your e-mail address is HTML-enabled, we may choose to send you graphic-rich HTML e-mail messages.

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ACCESS LOANS™ product is offered by Safra National Bank of New York ("SNBNY") Member FDIC, Equal Opportunity Lender