

(EFFECTIVE VERSION: JANUARY 2021)

The Board of Directors and management of HELM BANK USA understand how important personal privacy is to our customers. Employees of HELM BANK USA have a duty to protect the confidential nature of customers' financial records. In the interest of protecting the privacy of our customers the Board adopts the following Privacy Policy.

CUSTOMER EXPECTATIONS

The Bank knows that our customers expect privacy and security for their personal and financial affairs. The Bank will take all the necessary steps to safeguard sensitive information that has been entrusted to us by our customers. To that end, the following standards and procedures are intended to prevent misuse of customer information.

PERMISSIBLE REASONS TO COLLECT, MAINTAIN AND USE INFORMATION ABOUT OUR CUSTOMERS

HELM BANK USA will collect, retain and use information about our customers only when the Bank believes it will help administer our business (for example, we will obtain a credit report for an auto loan) or provide products, services and other opportunities to customers. The Bank will collect and retain information about customers ONLY for specific business purposes. When it does so, the Bank will tell our customers why we must gather the information.

The information we gather comes from a variety of sources, including:

- Information you provide to us (such as information on applications or other forms).
- Information related to your transactions with us (such as account balance and payment history).
- Information we receive from credit reporting agencies and other companies (such as your credit history) when you apply for a service.
- Information we obtain from unaffiliated third parties.

Information obtained when you use Internet products and services (such transaction information, information contained in e-mails you send us and cookies). The BANK may use a software "**cookie**" when accessing our PC banking product. No "**cookie**" will contain any information that would enable anyone to contact you via telephone, email or U.S. Mail. (A "**cookie**" is a small piece of information, which a website stores in the web browser of your PC and can later retrieve. A "**cookie**" cannot be read by a website other than the one that set the "**cookie**". You can set your web browser to inform you when "**cookies**" are set or to prevent "**cookies**" from being set).

The Bank must also collect certain information to comply with certain laws and regulations. The Bank may release customer financial information to sources such as a credit bureau or a subpoena, summons or warrant.

Sharing Nonpublic Personal Information

Finally, the Bank may use the information to create new products or improve existing products, services and delivery systems. At HELM BANK USA nonpublic customer information is NOT sold to outside parties. We may disclose nonpublic personal information about you to financial service providers, such as loan servicers and non-financial service providers, such as internal and external auditors and consultants. We may also disclose nonpublic personal information about you to nonaffiliated third parties as permitted by law. We DO NOT disclose nonpublic information about former customers.

At Helm Bank USA we maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We have procedures in place ensuring that the Bank:

- Collects, retains and uses information about our customers only when the Bank believes it will help administer our business or provide products, services and other opportunities for our customers.
- Maintains internal procedures to ensure that our customers' financial information is accurate, current and complete in accordance with laws and regulations.
- Limits employee access to personally identifiable information to those employees with a business reason to know such information.
- Takes disciplinary measures to enforce employee privacy responsibilities.
- Maintains security standards and procedures to help prevent unauthorized access to confidential information about our customers.
- Updates and tests our technology to improve the protection of our customers' information.
- Maintains our customers' privacy in business relationships with parties other than affiliated Banks and companies.
- Discloses our privacy policy and commitment to our customers and the use of customer information in brochures and on our Internet home page.

FAIR CREDIT REPORTING ACT

We strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We are committed to resolving any inaccuracies as quickly as possible.

Credit Reporting Agencies

If you believe we have reported inaccurate information about your account to any credit reporting agency, please let us know in writing. Be sure to include your complete name, current address, Social Security Number, telephone number, account number, type of account, specific item of dispute and the reason you believe the information is wrong. Send your notice to: HELM BANK USA, 999 Brickell Avenue, Miami, Florida 33131. We will investigate your concern and correct any inaccuracies we find. We will inform you of any actions we take.

RIGHT TO FINANCIAL PRIVACY ACT

The Right to Financial Privacy Act (RFPA) establishes specific procedures that federal government authorities must follow when seeking customer records. The Bank's employees will follow those procedures when a federal agency requests customer financial information. (See Right to Financial Privacy Policy and Procedures).

INTERNET AND ELECTRONIC BANKING PRIVACY POLICIES

The Bank collects information about visitors to our website. The applications and transactions the Bank accepts electronically (online, by phone, fax or via our automated teller machines) are all subject to the Bank's general privacy and security policy.

CHILDREN ONLINE PRIVACY PROTECTION ACT/FTC RULE (COPPA)

The Bank does not knowingly solicit data from children, and we do not knowingly market to children. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.

UNLAWFUL INTERNET GAMBLING NOTICE

The Bank prohibits the use of any account to conduct transactions (including, without limitation, the acceptance or receipt of credit or other receipt of funds through an electronic funds transfer, or by check, draft or similar instrument, or the proceeds of any of the foregoing) that are related, directly or indirectly to unlawful internet gambling. The term "**unlawful internet gambling**" as used in this notice, shall have the same meaning as set forth in Regulation GG. The Customer shall not conduct any transactions through the account that directly or indirectly involve or are related to unlawful internet gambling, including, without limitation, the acceptance or receipt of any funds or deposits in connection therewith.

PROCEDURES

DISCLOSURE OF CUSTOMER INFORMATION

HELM BANK USA's customer information will only be disclosed to authorized account holders, and only after identification of that account holder has been verified. Verifying information may include social security number, date and/or place of birth, mother's maiden name, signature and/or other identifying information. If the information request is made over the telephone and we are uncertain about the identity of the person requesting the information, we will ask that the request be made in writing or in person.

HELM BANK USA employees will not share personal or financial customer information with unaffiliated third parties except when legally required (in order to comply with federal or state laws/regulations, and government or court orders) or when legally permitted to serve the customer's interests (such as disclosure to reputable credit reporting agencies). Information will ONLY be disclosed to third parties under the following conditions: WHERE it is necessary to complete a transaction initiated by the customer; in order to report the existence and condition of an account to companies such as reputable credit bureaus or

merchants, in order to comply with government or court orders; if we have the written permission of the account holder.

HELM BANK USA will provide certain customer information to unaffiliated third party companies that we hire to provide us operational support. These unaffiliated third party companies provide services that allow us to complete transactions, such as real estate loans. Examples of these services include, but are not limited to, appraisals, title searches, flood certifications and credit reports. HELM BANK USA will not knowingly do business with any unaffiliated third party provider or company that uses or sells this information for marketing purposes unless the Bank has a joint marketing arrangement.

Further Information Regarding HELM BANK USA's Privacy Policy

You may receive a printed copy of this Privacy Statement by sending us an e-mail or writing to us at the address below. This statement addresses our policies including Internet information and internal customer information. Inquiries or comments should be sent by using the e-mail function on our website or addressed to:

HELM BANK USA
ATTN: Consumer Compliance Department
999 Brickell Avenue
Miami, FL 33131

INTERNET INFORMATION

HELM BANK USA recognizes the trust you have placed in us and our responsibility regarding your financial privacy. It is our responsibility to keep your sensitive financial and personal information confidential. We've always had a practice of protecting your privacy.

With the surge in Internet use, it has become even more crucial that we take steps to assure that your private information remains private. HELM BANK USA's Privacy Principles Include:

- Website Security / Website Privacy / Giving You Control of Your Personal Information.
- Website Security

HELM BANK USA has implemented technology to help assure that any sensitive personal information you provide us or any account information you receive on-line is done in a safe and secure manner. Special secured-connection hardware and software (commonly called "**firewalls**") are in place to help assure the security of online communication of your information.

Additionally, we have implemented procedures to help assure that only authorized HELM BANK USA employees may view the information you share with us. This is accomplished by limiting access to that information (via access capability and password control) to only those employees having a legitimate business purpose for viewing or responding to your information or inquiries.

This is the same procedure we follow for our customers that utilize other Banking methods, such as telephone Banking or branch Banking. These procedures are detailed in our internal Privacy Statement that is available to you by written request.

Website Privacy

Our website includes sections that are public (not password protected) and areas that are password protected (for example, individual customer Banking areas). When any person visits the public areas of our website, we may collect certain basic information, such as how many people visited our site and what pages were visited.

Unlike the personal information that you provide and view with respect to your personal Banking relationship (which is subject to the security procedures described above), all of the information we may gather in the public areas of our website is general. We use this general information to determine which parts of our website are most popular, how people access our site, how we can improve the content of our web pages and how we can improve service to our customers.

Also included in HELM BANK USA's Website is the capability for you to interact with us. This correspondence, via e-mail or phone, may be for the purpose of asking general questions, requesting literature or responding to Bank promotions. These activities may include sharing some personal information about you with HELM BANK USA.

WHETHER OR NOT YOU ARE A CUSTOMER OF HELM BANK USA, WE WILL COLLECT PERSONAL INFORMATION FROM YOU IF, AND ONLY IF, YOU VOLUNTARILY PROVIDE THAT INFORMATION TO US. IT IS OUR POLICY THAT WE WILL NOT SELL OR RENT CUSTOMER INFORMATION TO ANY UNAFFILIATED THIRD PARTY FOR MARKETING PURPOSES UNLESS WE HAVE A JOINT MARKETING ARRANGEMENT.

Giving you Control of Your Personal Information

We do not share information with any third parties (other than as required by law, regulation or contractual obligations), so you should not receive information from another company as a result of providing information to HELM BANK USA. If you provide us with your mailing address you may receive periodic mailings from us or our affiliates with information on products, services or upcoming events. We encourage you to request any marketing information that interests you from HELM BANK USA, such as loan rate promotions or deposit account specials.

In circumstances where you provide personal information (for example, name or mailing address), and you do not wish to receive product information from us in the future, please let us know by indicating your preference by mail, sending us an e-mail or writing us at our address at the bottom of this page.

SECURITY PROCEDURES TO PROTECT INFORMATION

Bank management will maintain security standards and procedures to help prevent unauthorized access to confidential information about customers. The Bank will update and test the technology on an ongoing basis to ensure the protection and integrity of customer information.

RESTRICTIONS ON DISCLOSING INFORMATION

The Bank will not reveal specific information about customer accounts or other personally identifiable data to other companies for their independent use unless:

- The customer requests or authorizes it.
- The information is provided to help complete a transaction initiated by the customer.
- The information is provided to a reputable credit bureau or similar information-reporting agency.
- The disclosure otherwise is lawfully permitted or required, such as a joint marketing arrangement.

MAINTAINING ACCURATE INFORMATION

The Bank is required by law to have procedures in place to ensure that customer financial information and history is accurate, current and complete. The Bank will not furnish information relating to a customer to any consumer reporting agency if we know that the information is inaccurate. The Bank will also not furnish information to a consumer reporting agency in the following situations:

- The consumer has notified the Bank, at the address specified by the Bank, that specific information is inaccurate.
- The information is inaccurate.

If a customer disputes the accuracy or completeness of information in a consumer report that the Bank provided to a consumer reporting agency, the Bank will not furnish the information to any consumer reporting agency without a notice that the customer disputed the information. We will take the following steps:

- Promptly notify the consumer reporting agency that the information is not complete or accurate.
- Provide the agency with corrections to the information, or any additional information necessary to make the information accurate or complete.
- Refrain from furnishing to the agency any information that remains incomplete or inaccurate.

DISPUTES ABOUT INFORMATION IN CONSUMER REPORTS.

If a customer notifies a consumer reporting agency that it disputes information the Bank provided, the Bank will take the following steps after receiving the notice from the agency:

- Investigate the disputed information.
- Review all relevant information the agency provided.
- Report the results to the agency.

If the Bank's investigation finds that the information is incomplete or inaccurate, the Bank will report the results to all other consumer reporting agencies to which the Bank reported the information. The Bank has 30 days from when the consumer reporting agency received the dispute notice to meet the above requirements.

Voluntary Account Closures

The Bank will notify consumer reporting agencies about customers who voluntarily close their accounts during the period the Bank normally report their credit history.

Delinquencies

If the Bank furnishes information to a consumer reporting agency regarding a delinquent account placed for collection, charged to profit or loss, or subjected to any similar action, the Bank will tell the agency no more than 90 days after providing the information of the month and year the delinquency began.

EMPLOYEE ACCESS TO INFORMATION AND ENFORCEMENT

All department managers will inform employees about the importance of confidentiality and customer privacy through department standard operating procedures, special training and our ethics policy. Employees with access to customer information are required to adhere to this Privacy Policy.

The Bank will implement procedures that limit employee access to personally identifiable information to those employees with a business reason to know such information about our customers. Employees of HELM BANK USA will only have access to customer information on a need to know basis.

Bank management will take appropriate disciplinary measures to enforce employee privacy responsibilities. Any employee that violates this Privacy Policy will be subject to disciplinary measures (warnings, suspensions, reprimands and possible termination of employment).