

Privacy Policy for Elite International Bank

Purpose

This Privacy Policy explains how Elite International Bank ("the Institution", "we", "our", or "us") collects, uses, discloses, and protects personal information in accordance with applicable laws and regulations in the United States and Puerto Rico, including but not limited to:

- Gramm-Leach-Bliley Act (GLBA)
- Regulation P (12 CFR Part 1016)
- Right to Financial Privacy Act (RFPA)
- Fair Credit Reporting Act (FCRA)
- Puerto Rico Financial Institutions Privacy and Data Protection laws
- Bank Secrecy Act (BSA) and Anti-Money Laundering (AML) requirements
- Any other applicable local or federal regulations

This policy applies to all clients, applicants, and users of our products and services, whether in person, online, or through affiliated third parties.

Definitions

This section provides definitions of key terms used throughout this Privacy Policy:

- **"Institution" / "we" / "our" / "us"** – Refers to the International Financial Institution operating in Puerto Rico and subject to U.S. and Puerto Rico regulations.
- **"Client" or "Customer"** – Any individual or entity that applies for, uses, or is offered our financial products or services.
- **"Personal Information" or "Nonpublic Personal Information (NPI)"** – Information that identifies or can be used to identify a customer, obtained in connection with providing a financial product or service, as defined under GLBA and Puerto Rico privacy laws.
- **"Affiliate"** – Any company related to the Institution by common ownership or control.
- **"Non-Affiliate"** – A third party not related by common ownership or control.
- **"Service Provider"** – A third party contracted to perform services or functions on behalf of the Institution.
- **"KYC" (Know Your Customer)** – Regulatory requirements to verify customer identity, assess risk, and comply with AML obligations.
- **"AML" (Anti-Money Laundering)** – Laws and processes designed to detect, prevent, and report money laundering and terrorist financing activities.
- **"OFAC"** – The Office of Foreign Assets Control, which administers and enforces economic and trade sanctions.
- **"Cookies"** – Small data files stored on a user's device to support website functionality and analytics.

1. Information We Collect

We may collect the following categories of information:

1.1 Personal Identifying Information (PII)

- Name, address, phone number, email address
- Date of birth
- Social Security Number, Employer Identification Number, or other national identification
- Citizenship and residency information

1.2 Financial Information

- Bank account numbers
- Transaction history
- Investment information
- Credit history and reports

1.3 Regulatory and Compliance Information

- KYC (Know Your Customer) data
- Source of funds and wealth information
- Identification documents and verification records
- Information collected under the Bank Secrecy Act, AML, OFAC, and 314(a) regulations

1.4 Digital Information

- IP address and device identifiers
- Cookies and browsing behavior for online banking users

1.5 Other Information

- Communications with customer service
- Information provided through forms, applications, or surveys

2. How We Use Your Information

We use personal information for:

- Providing banking, financial, and related services
- Processing transactions
- Conducting customer due diligence (CDD), enhanced due diligence (EDD), and ongoing monitoring
- Fraud prevention and security
- Complying with federal and Puerto Rico laws and regulations
- Reporting to regulatory and supervisory authorities

- Marketing or service improvement (only as permitted by law)

We will never use your information for purposes prohibited by law.

3. How We Share Information

We may disclose information as permitted or required by law:

3.1 Sharing with Affiliates

We may share information with affiliated entities for:

- Risk management
- Transaction processing
- Compliance purposes

3.2 Sharing with Non-Affiliates

We may share information with:

- Service providers and contractors
- Payment networks or correspondent banks
- Credit bureaus
- Regulatory or law enforcement agencies

All sharing complies with GLBA, FCRA, and Puerto Rico requirements.

3.3 Mandatory Disclosures

We will disclose information when required by:

- Court orders or lawful subpoenas
- Regulatory examinations
- OFAC, FinCEN, IRS, or other government agencies

3.4 Joint Marketing

We may share limited information with joint marketing partners, as allowed by Regulation P.

4. Your Privacy Rights

Depending on your status under federal and Puerto Rico laws, you may have the right to:

- Access your personal information
- Request corrections to inaccurate data

- Limit sharing for certain marketing purposes
- Opt-out of certain affiliate marketing uses (as allowed under FCRA)
- Receive annual privacy notices under GLBA

To exercise your rights, contact us at: cservice@eliteinternationalbank.com

5. Data Security Practices

We use administrative, physical, and technical safeguards to protect your information, including:

- Encryption of data at rest and in transit
- Secure access controls and authentication
- Ongoing monitoring and intrusion detection
- Physical security measures at all facilities
- Employee training on privacy and AML requirements

We comply with:

- Federal Interagency Guidelines Establishing Information Security Standards
- Puerto Rico data protection regulations

6. Data Retention

We retain personal information only as long as necessary to:

- Provide services
- Satisfy legal or regulatory obligations (e.g., BSA recordkeeping requirements)
- Maintain business and audit records

Retention periods vary depending on the type of data.

7. International Transfers

Our institution complies with all requirements regarding the transfer of financial and personal information between Puerto Rico, the United States, and international jurisdictions.

Transfers are performed using appropriate safeguards, such as:

- Regulatory-compliant contracts
- Secure communication channels

8. Cookies and Online Tracking

We may use cookies and similar technologies to:

- Improve site functionality
- Authenticate online banking sessions
- Analyze user behavior

You may manage cookie preferences through your browser settings.

9. Third-Party Websites

Our website or online banking platforms may link to external sites. We are not responsible for their privacy practices. Please review their privacy policies.

10. Changes to This Privacy Policy

We may update this policy from time to time. Significant changes will be communicated via:

- Email
- Website notifications
- Annual GLBA privacy notices

11. Contact Us

If you have questions or concerns regarding this Privacy Policy, please contact:

Elite International Bank

Customer Service Department

Address: 221 Avenida Ponce De León - Suite 1403, San Juan, Puerto Rico 00917

Phone: 787-523-9398 **Fax:** 787-523-8682

Webpage: www.eliteinternationalbank.com

Email: cservice@eliteinternationalbank.com

By using our services, you acknowledge that you have read and understood this Privacy Policy.