

Espirito Santo Inc. Web Site Consumer Privacy Policy

Your privacy is important to us. The following is important information about your privacy.

Overview

This Privacy Policy applies only to Espirito Santo Inc. ("Espirito Santo") and to consumer information and transactions. As you visit our website and request information on services or in order to provide you with services you may request or need, we may collect nonpublic personal information from you. It is our commitment to you that we will protect and safeguard your information.

Information Collection and Sharing

We may collect and share nonpublic personal information about you from the following sources:

- Information we may receive from you on forms or other documents, such as your name, address, account number, social security number;
- Information about your transactions with us;
- Information we may receive from a consumer reporting agency such as your creditworthiness and credit history.

We limit the use and collection of information about our customers to that which is necessary to administer our business, provide superior service that we think will be of interest to customers.

Former Customers

This Privacy Policy will continue to apply to information collected from you even after your relationship with Espirito Santo ends.

Security

We restrict access to information about you to those employees who need to know that information in order to provide services to you. We maintain physical, electronic and procedural safeguards that comply with Federal regulations to guard your nonpublic personal information.

Accuracy

Espirito Santo employs reasonable measures to ensure the accuracy, timeliness and completeness of our customer information. If we become aware of inaccuracies in our records, we take prompt steps to make appropriate corrections. If you believe that any information about you is inaccurate, please let us know.

Information Collected from You with Technology

We may collect information about you when you visit our Web site. This information may include technical information related to your computer and the manner in which you are accessing our site. This may include information such as the Internet protocol (IP) address of your computer, what browser software (e.g. Internet Explorer) your computer is using, the Uniform Resource Locator (URL) from which you last came to our site, the URL to which you go next and certain operating metrics such as the amount of time you use our site.

Linking to Us

Some of the links made available to you through our Web pages will allow you to leave our Web site. The privacy practices of linked Web sites are not covered by Espirito Santo's Web Site Privacy Policy. As such, we are not responsible for the privacy practices, data collection, security or content of other Web sites. You should review carefully any privacy policies posted on any linked sites prior to using

them. The fact that we have made these links available to you is not an endorsement or recommendation to you by Espirito Santo of any of these sites or the materials found there and we are providing these links only as a convenience to you.

Sharing Consumer Information

To protect customer privacy, we control carefully the way in which any information about customers is shared. We may share nonpublic personal information about you with the following types of third parties and may also share such information about you with other nonaffiliated third parties as permitted by law:

With Affiliate

Fair Credit Reporting Act (FCRA) Notice:

We may share with our affiliate Banco Espirito Santo information you may give us as part of us providing you with our services. Examples of the types of information collected and shared appear above in "Information Collection and Sharing." You may request us not to share this type of information with an affiliate by writing us at Espirito Santo Inc., 73 - 75 Ferry Street, Newark, NJ 07105 or by calling us toll-free at 1-800-455-1559, whereupon after a reasonable time for us to implement your request, the information will not be shared.

With Business Partners

We may share customer information with companies we hire to provide operational support, companies that participate with us in supplying products and services to customers, and companies that promote products and services on our behalf. These companies are not permitted to use our customer information for purposes other than the provision of the service intended. We will share your information with these companies only if they agree to treat it confidentially.

We may disclose all of the information we collect, as described in the section "Information Collection and Sharing," to companies that we may choose to perform marketing services on our behalf or to other financial institutions with which we may choose to have joint marketing agreements.

With the Government

The Bank Secrecy Act, Internal Revenue Code, Right to Financial Privacy Act, and various other laws and regulations require us or our contractors, under certain circumstances, to provide certain customer information to government agencies. We only disclose customer information to the government or others when we are required to do so by such laws, regulations or by court order. State and Federal laws impose certain mandatory disclosures of customer information by financial institutions. We must comply with laws that require mandatory production or disclosure.

If you have questions or concerns about this Privacy Policy, call 1-800-455-1559 or send an email to the General Manager, Espirito Santo Inc., Mr. Antonio Gato, at AntonioGato@EspiritoSanto.us.