

PRIVACY & COOKIE POLICY

Last updated: 09/10/2025

1. Introduction

APC Bank N.V. ("we", "our", "us") is committed to protecting your privacy and ensuring the security of your personal and financial data.

This Privacy & Cookie Policy applies to all our websites within the domain www.apcbank.cw and to our mobile banking app, and any other interfaces provided by us, together the "Platform", as part of our "Internet Banking System", both defined in our Terms and Conditions, and explains how we collect, use, store, secure, protect and otherwise process your information when you access the Platform.

We comply with applicable data protection legislations and financial regulations set by the Central Bank of Curaçao and Sint Maarten (CBCS) and follow best practices in data security and privacy.

2. Data We Collect

We collect, use and otherwise use the following types of personal data, i.e. data which provides information about you and which identify or can be used to identify you, when you use the Platform:

a. Personal Information

- Full name;
- Date of birth;
- Gender;
- Address and contact details (email, phone number);
- Identification documents (passport, sedula, driver's license or other ID);
- Employment information.

b. Financial & Transaction Data

- Bank account details;
- Transaction history;
- Payment instructions;
- Loan or credit information (if applicable).

c. Device & Technical Information

- Device ID, operating system, and IP address;
- App usage data (for security monitoring);
- Location data (if required for fraud prevention or regulatory compliance).

d. Biometric Data and Selfie Template Usage

- The Bank utilizes facial recognition technology to enhance security and protect customer identities. As part of this process, a mathematical representation ("Selfie Template") is generated from the customer's selfie image. The original selfie image is never stored.
- The Selfie Template is stored solely to verify and authenticate the customer's identity. It enables secure access to banking services and authorization of high-security actions such as high-value transactions, and card blocking/unblocking.
- The Selfie Template is not stored indefinitely. It is retained strictly for the duration of the customer's active relationship with the Bank, to ensure secure and continuous identity verification. Once the customer's account is closed, suspended, or permanently blocked, the Selfie Template is permanently deleted.
- The Bank does not share face data or Selfie Templates with any third parties. They are used internally and exclusively for customer identity verification.

3. How We Use Your Data

We use your data for the following purposes:

- Providing banking services (account management, payments, transactions);

- Fraud detection and security monitoring;
- Regulatory compliance (as required by CBCS or other authorities);
- Customer support and communication;
- Improving app functionality and user experience;
- Informing you about additional products or services provided by us, if you have opted for use of your personal data for marketing purposes.

4. Cookies, Tracking Technologies & Analytics

We use web cookies and similar tracking technologies, such as session tracking to maintain secure logins and prevent fraud, analytics tools to improve app performance, and crash reporting tools to identify and fix technical issues.

Cookies remember information about you, such as your bank account number, to facilitate and simplify your experience on the Platform. We use functional and analytic cookies as a standard. For social media and advertising cookies we ask for your consent. You may choose your preferred cookie settings upon opening your Account and any time thereafter in your Account on the Platform, or in your browser.

5. Third-Party Data Sharing

We only share your data with third parties when necessary for:

- Providing our services in accordance with our Agreement, including following up on your payment instructions to third-party bank accounts;
- Regulatory compliance, including reporting to CBCS and anti-money laundering authorities;
- Fraud prevention, including banks, payment processors and security services;
- Technical services, including cloud storage and authentication providers.

We do not sell or share your personal data for marketing purposes. We do not control the cookies used by your browser for marketing of third parties when accessing the Platform. You can change the settings of these cookies in your browser.

6. Data Security & Storage

We implement strict security measures, including:

- Encryption of data;
- Multi-factor authentication (MFA) for account access;
- Regular security audits and compliance checks.

Your data is stored securely within in secured cloud location.

7. User Rights & Control

You have the right to:

- Access and update your personal information;
- Request data deletion (subject to contractual and legal retention requirements);
- Manage tracking preferences (where applicable).

To exercise your rights, contact us at dataprivacy@apcbank.cw.

8. Compliance & Legal Obligations

We comply with applicable Curaçao financial regulations, including:

- The regulatory framework of CBCS;
- Anti-money laundering (AML) and counter-terrorism financing (CTF) laws;
- Other relevant financial and privacy standards.

9. Changes to Privacy & Cookie Policy

We may update this Privacy & Cookie Policy from time to time. Users will be notified of significant changes on our Platform and/or by email.

10. Contact Us

For questions about this Privacy & Cookie Policy, please contact:

APC Bank N.V.

De Ruyterkade 61

info@apcbank.cw

+5999 461.2722