

FACTS WHAT DOES BRICKELL BANK, BRICKELL GLOBAL MARKETS, AND BRICKELL GLOBAL ADVISORS 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(s) or service(s) you have with us. This information can include but is not limited to:

- Social Security number
- Income
- Account balances
- Transaction or loss history
- Assets
- Wire transfer instructions

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 Brickell Bank, Brickell Global Markets, and Brickell Global Advisors choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Brickell Bank, Brickell Global Markets, and Brickell Global Advisors 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 nonaffiliates to market to you	No	We don't share

Questions? Call (305) 347-8300 or go to www.brickellbankmiami.com

Who We Are	
Who is providing this notice?	Brickell Bank, Brickell Global Markets, and Brickell Global Advisors
What We Do	
How does Brickell Bank, Brickell Global Markets, and Brickell Global Advisors 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. We also maintain other physical, electronic and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.
How does Brickell Bank, Brickell Global Markets, and Brickell Global Advisors collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ● Open an account ● Use your credit or debit card ● Make deposits or withdrawals from your account ● Tell us about your investment or retirement earnings ● Apply for financing We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <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 State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ● <i>Brickell Bank, Brickell Global Markets, and Brickell Global Advisors.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ● <i>Brickell Bank, Brickell Global Markets, and Brickell Global Advisors do not share with nonaffiliates so they can market to you.</i>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ● <i>Brickell Bank, Brickell Global Markets, and Brickell Global Advisors don't jointly market.</i>
Other Important Information	
<p>For Alaska, Illinois, Maryland and North Dakota Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing - without your authorization.</p> <p>For California Customers. We will not share personal information with nonaffiliates either for them to market to you or for joint marketing - without your authorization. We will also limit our sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.</p> <p>For Massachusetts, Mississippi and New Jersey Customers. We will not share personal information from deposit or share relationships with nonaffiliates either for them to market to you or for joint marketing - without your authorization.</p> <p>For Vermont Customers. We will not share personal information with nonaffiliates for them to market to you without your authorization and we will not share personal information with affiliates or for joint marketing about your creditworthiness without your authorization.</p>	