



Member FDIC

## Business Confidentiality Statement

Effective September 2008

**Since 1868, Frost has recognized and respected our customers' right to confidentiality. We feel a strong commitment to rigorously safeguard and protect their financial information.**

Frost has established procedures mandating training and education programs to inform all employees of the need to limit access to customer records and maintain the confidentiality of these records. Access to individual identifiable records of customers is limited to employees with a valid business reason for such access. We have written procedures for providing and maintaining security for customer data and records. Physical customer records are stored in a secure location and protected by security procedures at all times. Strong, robust encryption technologies are used for computer-generated customer data and records. When exchanging customer information with third party processors, we enter into confidentiality agreements with respect to customer data. We strive to meet the highest legal and ethical standards in the conduct of our business as allowed by law, observing both the letter and the spirit of the regulations surrounding the confidentiality and security of customer information.