Banking Costs in Curaçao

A Market Research Comparing Rates and Fees for Personal Banking Products

RESEARCH REPORT





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Colophon

Date: January 10, 2020

RE-Quest Research & Consultancy

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Commissioned by: Fundashon pa Konsumidó (FpK) and

Fair Trade Authority Curação (FTAC)

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Summary

Consumers use banking products almost every day. In Curaçao, private consumers have nine banks to choose from when it comes to personal banking. For each banking product, banks charge several fees and rates depending on the specific needs of the customer. Consumers may not always be aware that banks apply certain fees or rates or have difficulty understanding them. This can make the decision-making process more difficult for consumers.

The objective of this research is to compare the fees and rates of seven personal banking products in Curaçao and make them transparent and understandable for the consumer. RE-Quest Research & Consultancy (RE-Quest) conducted an online survey in the first half of 2019 among nine banks in order to gather the necessary information. The questionnaire consisted of 129 different fees and rates in total. All fees and rates mentioned in this report apply in Curaçao as of August 1, 2019 and include tax (OB).

Table 1: Scope of this research.

Banks in Curaçao that offer personal banking products:	Personal banking products included in this research:
 Algemene Spaar- en Kredietcoöperatie (ACU)* Banco di Caribe N.V. CIBC First Caribbean Bank Girobank N.V. Maduro & Curiel's Bank N.V. (MCB) ORCO Bank N.V. PSB Bank N.V.* RBC Royal Bank N.V. Vidanova Bank N.V. 	 Personal accounts (30) Savings accounts (24) Savings deposits (4) Credit Cards in ANG (14) and in USD (15) Money Cards in ANG (12) and in USD (12) Personal loans in ANG (9) Car loans in ANG (9) The number between brackets refers to the number of fees and rates for this product that each bank provided information about
*Please note ACU and PSB Bank are not commercial banks and therefore have some limitations (see §2.2)	, ,

Most banks offer several variations of one personal banking product, such as a Visa Classic Credit Card or Visa Gold Credit Card. For every personal banking product, RE-Quest asked each bank to identify the most common variant that they sell in Curação. The results described below are based on a comparison between banks of their most common variants.

For almost each personal banking product, consumers can choose between multiple banks

All nine banks offer savings accounts, savings deposits, personal loans and car loans in Curação. Current accounts and credit cards in US Dollar are offered by eight out of nine banks. PSB Bank does not offer these. Furthermore, four banks offer money cards in US Dollar. MCB is the only bank in Curação that offers credit and money cards in Antillean Guilders (ANG).

There are large price-differences between banks for each product

The results of the survey show that for each personal banking product the differences in fees and rates between banks are relatively large. This means that consumers can save money by comparing the rates and fees of banks when buying a new product (or switching to another bank for the same product). Below, the results for each personal banking product are described in more detail.

Results for personal accounts

A personal account allows consumers to send and receive money. Every bank in Curaçao that provides personal accounts, offers Online Banking for free which customers can use for various services, such as downloading digital banking statements. The account holder also receives a debit card free of charge in order to make payments in shops or use an ATM. Banks charge customers fees and/or rates for the following services related to the personal account:

- maintaining the account for the customer;
- processing transactions, such as a transfer of funds or cash withdrawal from an ATM;
- lending money when the customer has a negative balance on the account (overdraft); and
- other services, such as sending paper banking statements by mail or replacing a lost debit card.

There is no bank that offers the best fees and rates for all of these services. Some banks charge relatively low transaction fees, while others are cheaper when providing overdraft facilities. Thus, the personal circumstances of the consumer – such as the number of transactions, use of online banking, account balance and need for optional services – determine which bank is the cheapest option.

ACU charges below-average fees and rates for many services. For example, there is no monthly administration fee and most transactions are processed free of charge. However, ACU is not a commercial bank but a credit union and has at least three limitations compared to other providers: (1) not everyone can become a customer, (2) ACU only offers transactions in ANG and not in USD or EUR and (3) only ATMs of the Girobank can be used.

Although transferring funds or paying bills is still possible at the counter of most banks, it is (much) more expensive than via online banking. At three providers (ACU, MCB and ORCO Bank) sending money to a third party account is free of charge via online banking.

Results for savings accounts

A savings account is an account where consumers can store money in order to earn interest. The money that is on the savings account is always accessible for the account holder which makes it different from a savings deposit.

ACU offers the highest interest rate (2,5% per year) but charges an administration fee of ANG 1,59 per month while most other banks provide savings accounts free of charge. **CIBC First Caribbean Bank** offers the second-highest interest rate (2,25% per year) and charges no monthly administration fee. The lowest interest rate that a bank offers, is 0,5% annually (**Banco di Caribe, MCB** and **RBC Royal Bank**).

In Curacao, it is possible to transfer or withdraw money from a savings account – at the counter, via online banking or at an ATM - just like a personal account. Many transaction fees at a particular bank are the same as the transaction fees for personal accounts.

Results for savings deposits

A savings deposit usually pays higher interest than a savings account because the money is - in principle - not accessible for a certain period of time. In this research, RE-Quest compared the fees and rates for a 1-year fixed period and a 5-year fixed period savings deposit. All banks provide savings deposits for free.

ACU offers the highest interest rate in case of a 1-year term (3% per year) and **Girobank** offers the highest interest rate in case of a 5-year term (3% per year). ACU does not offer a 5-year fixed period savings deposit.

Consumers may want to withdraw part of their deposit before the fixed interest period expires. CIBC stated that an early withdrawal of money from a savings deposit was not possible. ACU stated that only a withdrawal of the full deposit is possible under certain conditions. The remaining banks use different methods to calculate the penalty fee. Which bank charges the lowest penalty fee depends on the specific situation of the consumer.

Results for credit cards in USD

A credit card is an electronic card that consumers use to make payments in stores or online and borrow money from the bank simultaneously. Cardholders pay back that borrowed money at fixed intervals. Consumers pay a yearly fee for owning a credit card. Payments in USD are free of charge *for the cardholder*.

In Curaçao, the yearly fee that banks charge for a Visa Classic credit card is relatively similar, between USD 35 and USD 40 (CIBC only offers a Visa Platinum credit card for USD 150 per year). The same applies for the interest to be paid on the credit card balance. Every bank charges an interest rate of 18% per year, except for the **Girobank** which charges 15% per year (up to the authorized credit amount).

However, larger differences between banks were found for *late payment fees, foreign currency conversion fees* and *cash advance fees*. For example, a consumer pays USD 12 at **Vidanova Bank** when he or she fails to pay the minimum amount due on time, whereas this fee is USD 35 or more at RBC Royal Bank.

Results for money cards in USD

A money card is an electronic card that consumers can store money on in advance in order to make payments worldwide. Consumers pay a one-off *issuing fee* when purchasing a new money card and a *reload fee* each time extra money is loaded onto the card. Payments with a money card are free of charge for the cardholder at every bank that offers this product in Curação.

Overall, **Vidanova Bank** charges the lowest fees for owning and using a money card in US Dollar. For example, the issuing fee is USD 7,95 and the fee for loading extra money onto the card through online banking is USD 2,12. By comparison, the highest issuing fee that a bank charges, is USD 31,80 (**MCB**). Furthermore, Vidanova Bank doesn't charge a fee when refunding money in case of a lost card.

Results for personal loans in ANG

When providing loans to customers, banks typically charge a combination of a yearly interest rate and one-off fees, such as a closing fee. This can make it difficult for the consumer to compare the offerings between banks., Banks in Curaçao - just as in many other countries - are therefore obligated to disclose the *Annual Percentage Rate* (APR) to potential clients. The APR is a number that expresses the total costs of the loan on a yearly basis. The lower the APR, the better the offer of the bank.

RE-Quest asked the banks to provide the APR for a fictional personal loan of ANG 15.000 to be repaid in full over a period of 36 months. For this type of personal loan, **ORCO Bank** has the lowest APR of 7,3%, the highest APR that a bank charges is 19,0% (**RBC Royal Bank**). We have received insufficient reliable information to present the monthly and total costs of the personal loans in this report.

The questionnaire also included some fees that banks may charge after the loan is provided, such as a late payment fee or a fee to restructure the loan. The survey showed that banks use different methods to calculate these fees. Which bank charges the lowest fee depends on the specific situation of the consumer. **CIBC First Caribbean Bank** differs from the other banks in the sense that most of these services are provided for free.

Results for car loans in ANG

For car loans, RE-Quest asked the banks to provide the APR for a fictional loan of ANG 50.000 to be repaid in full over a period of 60 months. For this type of car loan, **RBC Royal Bank** has the lowest APR of 5,6%, the highest APR that a bank charges is 8,8% (**MCB**). We have received insufficient reliable information to present the monthly and total costs of the car loans in this report.

Just like with personal loans, banks use different methods to calculate fees that may be charged after the loan is provided. For this product **CIBC First Caribbean Bank** provides some of these services for free as well, such as restructuring or extending the loan.

Personal circumstances and preferences matter when choosing a bank

The information in this report enables the reader to make a price-comparison between banks on a general level. This research shows that the level of price-competition that each bank exerts, differs per personal banking product. Therefore, price-oriented consumers could save money by shopping at multiple banks. Please note that this research did not take into account the *switching costs* - including time and effort – that consumers who already bought a similar product face.

In practice, the personal circumstances and preferences differ between consumers which influences their choice for a specific bank. For example, banks may charge lower fees for students or charge a risk premium for certain customers that apply for a loan. Also, banks may offer specials during campaign periods, discounts if a customer buys multiple financial products from them, or are prepared to match competitive offers to retain or win clients. Finally, consumers may choose a more expensive bank because they perceive a higher solvency of a bank, a higher quality of service or better ATM-availability.

Post script: Girobank

Several developments at Girobank were in the news during the completion of this report, after all the data had been collected, regarding the solvency of Girobank.

Girobank has been under guardianship of the Central Bank of Curaçao and Sint Maarten (CBCS) for the past six years. During these six years the Girobank was providing services to the public like any other bank. For this reason, Girobank was included as part of this research. The Girobank honored our request for information and verified their fees and rates included in a final draft-version of this report.

The objective of this research is to compare the fees and rates of personal banking products in Curação and make them transparent and understandable for the consumer. Taking into account this objective there was no immediate reason to exclude the information provided by Girobank from this report.

Introduction

1.1 Research on personal banking costs in Curação

Consumers use banking products almost every day. In Curação consumers have nine banks¹ to choose from when it comes to personal banking. Banking costs money and price is an important aspect for customers when it comes to choosing a banking service, but not all consumers may have insight into the costs involved.

The objective of this research is to compare the fees and interest rates of seven (retail) banking products of nine banks in Curação and make them transparent and understandable for the consumer.

This research is executed by RE-Quest Research & Consultancy and commissioned by the Fundashon pa Konsumidó (FpK) and the Fair Trade Authority Curaçao (FTAC). This report on the results of the comparison is open to the public. It can be used by for example:

- Private customers to make an informed decision when choosing or switching a bank.
- Banks to gain insight into how their product offerings compare with their competitors.
- FTAC as input for its supervision of compliance with the National Ordinance on Competition² in the financial sector and to stimulate competition between banks.
- FpK to better inform consumers about the differences in fees and interest rates between banks.

1.2 Research question: compare fees and rates

Price is an important aspect for customers when it comes to choosing a banking service.³ In this research, we compared nine banks regarding personal banking products. We assessed the following aspects:

- Offered Products.
- Administration fees and (interest) rates.

By assessing these aspects, we could answer the following questions:

- Which products are offered by which bank?
- Who has the best and least favorable fees and rates?

https://web.archive.org/web/20190502123423/https://www.centralbank.cw/uploads/files/Register%20 Kredietinstellingen%20%20januari%202019%20.pdf.

¹See also: Register Kredietinstellingen 2019, CBCS.

² See also: <u>https://ftac.cw/en/regulations/national-ordinance-on-competition/</u>

³ Van Dijk Management Consultants, 2009, Data collection for prices of current accounts provided to consumers (https://www.ceps.eu/wp-content/uploads/2013/05/prices current accounts report en o.pdf) and Panteia, 2016, Voordelen van (online) shoppen voor financiële producten. (https://www.acm.nl/sites/default/files/old_publication/publicaties/15662_rapportage-voordelen-shoppen-financiele-producten-2016.pdf)

Research method

2.1 Research on personal banking costs in Curação

In this research we applied an online survey approach. In the period of February 2019 to June 2019, we conducted a survey among nine banks in Curaçao. All boards of the banks received an official invitation (see appendix 1) to participate in the research and to fill out an online survey, assessing 129 different fees and rates. The chairman of the Curaçao Banking Association (CBA) also received a letter to encourage participation among its members.

Filling out the online survey took about 60 minutes assuming that the requested information about fees and rates was readily available within the organization. Banks received their completed survey by email on submission. After submitting the online survey, we verified the information as filled out with the banks with the board of the bank and/or their contact person. Furthermore, the banks received a draft version of the report before publication, so they could indicate any substantive inaccuracies if applicable.

2.2 Which banks were assessed?

All nine banks that offer banking products to private consumers in Curação participated during this research. Seven banks submitted the requested information on a voluntary basis. Two other banks did not and therefore received a formal request for information from FTAC which obligated them to submit the information. RE-Quest, FTAC and FpK express their gratitude to all the banks for their cooperation.

In this research we compared the products offered and the costs of nine banks in Curaçao. The following nine banks in Curaçao are assessed and compared (in alphabetic order):

- Algemene Spaar- en Kredietcoöperatie (ACU)
- Banco di Caribe N.V. (BdC)
- CIBC First Caribbean Bank (CIBC)
- Girobank N.V. (GIRO)
- Maduro & Curiel's Bank N.V. (MCB)
- ORCO Bank N.V. (ORCO)
- PSB Bank (PSB)
- RBC Royal Bank N.V. (RBC)
- Vidanova Bank N.V. (VIDA)



















All nine banks are registered at the Central Bank of Curação and St. Maarten. PSB and ACU have a special position in the market, as PSB Bank is registered as a Savings Bank. These two firms are therefore unable to provide all banking services and facilities as is the case with a general bank. ACU is registered as a Credit Union.⁵ ACU as a provider of personal banking products has at least three limitations compared to other banks:

- Not everyone can become an ACU customer;
- ACU only offers transactions in ANG and not in USD or EUR; and
- ACU has a limited network of ATMs: only ATMs from the GIRO can be used. 6

Scope of the research 2.3

Each bank was assessed in relation to the following products (if applicable):

- Personal account
- Savings account
- Savings deposit
- Credit card (in ANG and in USD)
- Money card (in ANG and in USD)
- Personal loan
- Car loan

The survey assessed the current standard fees and rates, special offers were excluded from the scope of the survey. Furthermore, this research purely focuses on local private customers, business customers are left out of scope. For personal loans and car loans, the product rates were assessed using a specific script or situation to be able to compare the rates of the various banks' offer as well as possible. In case of the personal loan we asked for the Annual Percentage Rate ("APR")⁷ in case of a personal loan of ANG 15.000 repaid in full over a period of 36 months / 3 years. In case of the car loan we asked for the APR in case of a car loan of ANG 50.000 repaid in full over a period of 60 months / 5 years.

Most banks offer several variations of one product. For all products we asked to identify the most common variant offered to their customers, to be assessed in this research. For example, RBC offers four types of personal accounts of which "Day-to-Day Banking" is the most common.8

Besides the products offered and assessed rates, other aspects can be relevant for private customers when choosing a bank. For instance, the terms and conditions, services, personal approach or number of ATMs or branches. These aspects were not included in this research. We limited the research to a set of 129 different fees and rates. Please note this list is not exhaustive but includes the most common rates and fees. At some banks other additional fees may be applicable. An overview of all 129 rates and fees assessed per product is included in appendix 2.

What aspects were assessed and how? 2.4

The survey focused on the following important aspects regarding the banking products:

- Which of the seven products are offered by each bank?
- Who has the best and who has the least favorable rates for a personal account?
- Who has the best and who has the least favorable rates for a savings account?
- Who has the best and who has the least favorable rates for a savings deposit?
- Who has the best and who has the least favorable rates for a *credit card*?
- Who has the best and who has the least favorable rates for a money card?
- Who has the best and who has the least favorable rates for a *personal loan*? Who has the best and who has the least favorable rates for a car loan?

⁴ See: <u>https://www.centralbank.cw/functions/supervision/supervised-institutions</u> -> filter on 'credit institutions'

⁵ Please note that although ACU is a credit union and not a bank, in this report, we refer to ACU as 'bank'.

⁶ See also: <u>https://www.acu.cw/frequently-asked-questions/</u>

⁷ The Annual Percentage Rate (APR) is a number that expresses the total costs of the loan on a yearly basis. The lower the APR, the better the offer of the bank. See: http://www.rbcroyalbank.com/caribbean/an/everyday-banking/banking-accounts.html

The fees and rates were measured in ANG, including OB, unless indicated otherwise. For all products we provided the banks with a possibility to elaborate on the fees and rates and add notes.

The fees and rates mentioned in this report apply in Curação as of August 1, 2019. Recent changes in fees and rates made by some banks, such as MCB and PSB, before this date are therefore included in this report. Possible future revisions in fees or rates by banks after August 1, 2019 are not included in this report.

2.5 Consultation of the draft-report

All banks completed the online survey (March - June 2019), after which the information as filled out was verified with the banks and additional clarifying information was retrieved (July – August 2019). All banks received a draft version of the report (November 2019) before publication, so they could indicate any substantive inaccuracies if applicable. Seven of the nine banks responded to this consultation, ACU and ORCO chose not to use the option to respond. The seven banks have double checked the information and, where necessary, suggested small corrections, that were included in the finalization of the report.

During the consultation round of the draft-report we asked for an explanation of the APRs provided for car and personal loans, and whether they are in accordance with the Guideline Annual Percentage Rate provisions or the CBCS⁹. Based on the results, we are under the impression that the APR Provisions are not applied the same by every bank. However, we have not received enough clear and consistent answers from the banks. The APRs are presented as provided prior to the consultation round of the draft report, e.g. because MCB and RBC provided their updated APRs and not the ones of 1st of August 2019.

⁹ See: https://cbcs.spin-cdn.com/media/legislation_guidelines/20190120_apr_provisions_2017.pdf

3. Results

3.1 Overview of available products

The table below gives an overview of the seven banking products studied and the banks that offer them. All nine banks offer savings accounts, savings deposits, personal loans and car loans. Only MCB offers Credit Cards and Money Cards in ANG. PSB Bank is registered as a Savings Bank and ACU as a Credit Union at the Central Bank of Curação and Sint Maarten. These two firms are therefore unable to provide all banking services and facilities as is the case with a general bank. MCB offers all products assessed in this research.

Table 2: Available products at each bank.

Does the bank offer	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA	Total count
1. PERSONAL ACCOUNTS	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	8
2. SAVINGS ACCOUNTS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9
3. SAVINGS DEPOSITS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9
4.a CREDIT CARDS in ANG	No	No	No	No	Yes	No	No	No	No	1
4.b CREDIT CARDS in USD	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	7
5.a MONEY CARDS in ANG	No	No	No	No	Yes	No	No	No	No	1
5.b MONEY CARDS in USD	No	Yes	No	No	Yes	No	No	Yes	Yes	4
6. PERSONAL LOANS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9
7. CAR LOANS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9
Online Banking	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	8
Total count of assessed products the bank offers	5	7	6	6	9	6	4	7	7	

Source: online survey among banks. Situation as of August 1, 2019.

3.2 Results for personal accounts

3.2.1 What is a personal account and which costs are involved?

A personal account allows consumers to send and receive money. A personal account, also called a current or payment account, is a deposit account held at a bank. It is available to the account owner "on demand" and is available for frequent and immediate access. Access may be in a variety of ways, such as cash withdrawals, use of debit cards, cheques (checks) and electronic transfers. The bank that maintains the personal account may charge the account holder e.g. maintenance fees, transaction fees or overdraft fees. Common fees and rates that may be charged to a private customer, are:

Table 3: Common fees and rates for personal accounts.

Name rate / fee	Description
Administration fees:	A monthly fee charged by the bank to cover expenses related to record keeping and/or other administrative costs.
Fee debit card:	fee for the service of issuing a debit card.
Fees for receiving bank statements:	A bank statement is a summary of financial transactions which have occurred over a given period on a bank account. Bank statements are printed on paper and mailed to the account holder. In recent years there has been a shift towards paperless, electronic statements, and most banks offer direct download from online banking platforms.
Deposit on own account (local currency):	A fee to put your cash money on your own bank account.
Withdrawal from own account (local currency):	A fee to take your money in cash from your own bank account.
Transfer:	A bank transfer is when money is sent from one bank account to another. Transferring money from your bank account is usually fast, free and safer than withdrawing and paying in cash. The transfer can be: • between own accounts at own bank: that is two accounts in your name • to third party account at same bank: to any account not owned by you at the same bank • to third party account at other local bank: to any account not owned by you at another bank in Curacao
Standing order to third party account at same bank or other local bank:	A Standing order is an instruction to a bank to pay a set amount at regular intervals, e.g. a monthly rent or subscription.
Bill payment:	The service for paying utility bills (e.g. to UTS, TDS, TRES, FLOW, Curgas, Aqualectra) often done the same day. It is a specific process of payment and is thus distinguished.
Interest rate in case of positive balance (positief saldo) account holder:	A bank can give interest on a positive balance (as often happens with a savings account), so that a consumer can earn interest money.
Interest rate in case of negative balance (negatief saldo) - authorized and unauthorized overdrawn:	Banks levy this fee when consumers withdraw more from an account than is available, the available balance goes below zero. If there is a prior agreement with the bank for an overdraft, and the amount overdrawn is within the authorized overdraft limit, then interest is normally charged at the agreed rate. If the negative balance exceeds the agreed terms (unauthorized overdraft), then additional fees may be charged and higher interest rates may apply. Many consumers pay a high interest rate for standing in red, while they have savings at the same bank.
New debit card:	Fee for issuing a banking card to the first time.
Renewal debit card:	Fee for issuing a banking card when the banking card is expired.
Replace lost debit card:	Fee for issuing a banking card when the banking card is lost or stolen.
Replace lost E-Pass/ Online banking token:	Fee for issuing a new card/token (needed to access the online banking platform) when it is lost or stolen.

The costs can differ when banking activities are done:

- At the *counter* of your bank: where you will get service in person at a branch of your bank.
- Via online banking when you conduct transactions electronically via the Internet.
- At the ATM: an Automated Teller Machine (recognizable by the "Bankomatiko" sign) that accepts debit cards and major credit cards. For debit cards the Maestro, Cirrus, and Cashnet systems are used and a customer can use their debit card at an ATM by making sure the card has at least one of their symbols on it. Many banks have their own ATMs offering services. For some transactions you can also go to ATMs from other banks, but often at a higher cost.

3.2.2 Most common personal accounts offered

We asked the banks to name their most common product in this category. The table below offers an overview of the results. PSB Bank is the only bank that does not offer a personal account, as they are not a general bank but a savings bank and are therefore unable to provide all banking services and facilities as is the case with a general bank.

Table 4: What is the name of the most common PERSONAL ACCOUNT you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	Kuenta Koriente
Banco di Caribe N.V. (BdC)	Current Account
CIBC First Caribbean Bank (CIBC)	Current Account
Girobank N.V.(GIRO)	Demand Deposit Account
Maduro & Curiel`s Bank N.V. (MCB)	Current Account
ORCO Bank N.V. (ORCO)	Current Account
PSB Bank (PSB)	N.A.
RBC Royal Bank N.V. (RBC)	Day to Day Banking Account
Vidanova Bank N.V. (VIDA)	Current Account

Source: online survey among banks. Situation as of August 1, 2019.

3.2.3 Administration fees personal accounts

The results show large differences in the different Administration fees for personal accounts. For the monthly administration fee, the costs range from ANG o (ACU and CIBC) to ANG 10.60 (RBC). All banks provide a debit card free of charge and offer digital bank statements (either via email or download via online banking) free of charge. Costs for receiving a paper bank statement vary between ANG o (ACU and VIDA NOVA) and ANG 10.00 (ORCO) per month.

Table 5: Administration fees for personal accounts.

1.1 Administration fees	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Monthly administration fee for a personal account with 1 account holder	Free	3.71	Free	3.50	3.71	3.50	N.A.	10.60	3.71
Yearly fee debit card	Free	Free	Free	Free	Free	Free	N.A.	Free	Free
Paper banking statement (monthly fee to receive monthly by mail/post)	Free	3.71	5.00	5.30	5.30	10.00	N.A.	1.59	Free
Digital banking statement (receive each month by email or download via online banking)	Free	Free	Free	Free	Free	Free	N.A.	Free	Free

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

3.2.4 Fees for deposit, withdrawal, transfer and bill payment

We asked the banks about the fees for deposit, withdrawal or transfer of funds and for bill payments from a personal account in three different situations: at the counter of your bank, via online banking and at an ATM. Generally speaking, the fees at the counter are much higher than when using online banking or an ATM. Differences in fees are relatively large between banks, MCB and RBC charge the highest fees at the counter. At the ATM, most banks charge a fee for a cash withdrawal from their account at an ATM of a different bank, but also from an ATM of their own bank. For ATM transactions, the level of the rate is sometimes different, depending on the type of ATM used (Cashnet or Cirrus). MCB charges the highest rates for "bill payments" at both ATMs and the counter: respectively ANG 5.30 and ANG 1.06 for each bill paid. The table below offers an overview of the results.

Table 6: Charges deposit, withdrawal, transfer and bill payment for personal accounts.

1.2 Charges deposit, withdrawal, transfer and bill payment - at the counter of your bank	ACU	BdC	CIBC	GIRO	мсв	ORCO	PSB	RBC	VIDA
Deposit on own account (local currency)	Free	Free	Free	Free	2.12	Free	N.A.	2.65	Free
Withdrawal from own account (local currency)	Free	1.06	Free	1.33	3.71	Free	N.A.	2.65	1.06
Transfer between own accounts at own bank	Free	Free	Free	Free	3.71	Free	N.A.	Free	Free
Transfer to third party account at same bank	1.59	2.65	Free	2.65	5.30	Free	N.A.	5.30	Free
Transfer to third party account at other local bank	1.86 ¹⁰	4.24	N.A.	4.24	5.30	3.75	N.A.	5.30	3.18 ¹¹
Standing order to third party account at same bank	1.86 ¹⁰	2.65	N.A.	2.65	2.65	3.00	N.A.	3.71	2.12 ¹¹ + one- time 5.30 ¹²
Standing order to third party account at other local bank	1.8610	4.24	N.A.	5.30	5.30	3.00	N.A.	5.83	3.18 ¹¹ + one- time 5.30 ¹²
Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)	Free	2.65	Free	2.65 ¹³	5.30	Free	N.A.	2.65	N.A.
1.3 Charges deposit, withdraw, transfer and bill payment – through online banking	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Transfer between own accounts at own bank	Free	Free	Free	Free	Free	Free	N.A.	Free	Free
Transfer to third party account at same bank	Free	1.06	Free	Free	Free	Free	N.A.	Free	1.06
Transfer to third party account at other local bank	Free	1.06	1.00	1.59	Free	Free	N.A.	1.59	1.06
Standing order to third party account at same bank	Free	1.06	Free ¹⁵	2.65	Free	Free	N.A.	1.59	2.12 + one- time 5.30 ¹²
Standing order to third party account at other local bank	Free	1.06	Free ¹⁵	5.30	Free	Free	N.A.	1.59	3.18 + one- time 5.30 ¹²
Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)	Free	Free	Free	Free	Free	Free	N.A.	2.65	1.06
1.4 Charges deposit, withdraw, transfer and bill payment – at the ATM	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Withdrawal from own account at ATM of own bank	0.75	1.06	Free	1.06	1.06	N.A.	N.A.	Free	1.06
Withdrawal from own account at ATM of different bank	1.75 ¹⁶	2.12	Varia- ble ¹⁷	2.12	Cashn et 2.12, Cirrus 4.72	1.50	N.A.	Cash net 2.12	2.12
Transfer between own accounts at own bank	Free	Free	Free	Free	Free	N.A.	N.A.	Free	Free

⁻

¹⁰ ACU added the following comment to this fee: "The members can make transfers to other banks and pay monthly bills through the department of Transfer. The cost related to that is ANG 1.86 each time. The request can be sent through email or filled in through a customer services agent personally."

¹¹ VIDA added the following comment to this fee: "Not available at counter, but can be done via a transfer order (for which a form can be filled in by the customer and dropped off at the bank branch) for the indicated fee."

¹² VIDA added the following comment to this fee: "A one-time fee of ANG 5.30 applies on Standing Orders through all the applicable channels."

¹³GIRO added the following comment to this fee: "Except for Aqualectra, UTS, Digicel, Selikor, these are free of charge."

 $^{^{14}}$ For transfers up to ANG 50.000. If the transferred amount is more than ANG 50.000, the fee is ANG 10.

¹⁵ CIBC added the following comment to this fee: "Standing order and Bill payments functionalities are called "Set-up of Scheduling" in our Internet banking application"

¹⁶ Withdrawals are only possible at ATMs of the Girobank.

¹⁷ CIBC added the following comment to this fee: "The fee varies from Bank to Bank. Each Bank stipulates the fee they charge for withdrawal at their ATM."

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

3.2.5 Interest rates personal accounts

None of the 9 banks offer an interest rate in case of positive balance on a personal account, with exception of ACU that offers 1 % per year for retirees (penshonados).

Almost all banks charge an overdrawn fee and / or interest rate in case of a negative balance, with interest rates ranging from 0 % (ACU) to 18 % per annum (RBC). When the overdrawn is unauthorized these rates are higher. The percentage is calculated on the negative balance. For example, an annualized 18% interest rate on a ANG 100 negative balance means that the customer must repay the initial amount of ANG 100 plus an additional ANG 18 after one full year. 18

Table 7: Interest rates for personal accounts.

1.5 Interest rates	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Yearly Interest rate in case of positive balance (positief saldo) account holder	N.A. ¹⁹	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Yearly Interest rate in case of negative balance (negatief saldo) - authorized overdrawn	o% ²⁰	10%	15%	12%	12%	8%	N.A.	18%	7-9%
Yearly Interest rate in case of negative balance (negatief saldo) - unauthorized overdrawn	N.A.	18%	15% + 50.00 over- drawn fee	18%	18%	17.75%	N.A.	18%	18 %

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'N.A.' means not available at this bank.

3.2.6 Replacement fees debit card or online banking identifier

None of the 9 banks charge fees for a new debit card or the renewal of a debit card. In case of a lost debit card, all banks with exception of CIBC charge a fee, ranging from ANG 10.50 (ORCO) to ANG 37.30 (GIROBANK). The replacement fee of a lost e-pass or online banking token costs the most at Banco di Caribe (ANG 106).

Table 8: Replacement fees for debit card or online banking identifier for personal accounts.

1.6 Replacement	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
New debit card	Free	Free	Free	Free	Free	Free	N.A.	Free	Free
Renewal debit card	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Replace lost debit card	10.60	15.90	Free	37.10	15.90	10.50	N.A.	15.90	12.72
Replace lost E-Pass/Online banking token	53.00	106.00	N.A. ²¹	21.20	5.30	25.00	N.A.	26.50	53.00

 $^{^{\}mbox{\scriptsize 18}}$ And possibly more as a result of the compounding interest effect.

¹⁹ Only for penshonado's: 1% per year.

²⁰ ACU added the following note to this rate: "Only when a client does not have sufficient funds to process a standing order, a fee of ANG 15.90 is charged to the client for every occurrence. No rate is used if a client remains to have a negative balance."

²¹ CIBC added the following note to this rate: "CIBC does not offer an E-Pass/Online Token: upon logging in, a verification code is sent via sms or voicemail."

3.3 Results for savings accounts

3.3.1 What is a savings account and which costs are involved?

A savings account is an account that customers can use to save at a bank. These accounts let customers set aside a portion of their liquid assets while earning a monetary return: an interest-rate payment. In this case we mean a regular savings account where the savings are freely available. It is therefore not fixed for a certain period. At many banks, customers receive a debit card with their savings account with which they can carry out payment transactions, similar to a personal account.

Common fees and rates that may be charged to a private consumer, are comparable to those for a personal account. For a description of these rates we refer to paragraph 3.2.1.

3.3.2 Most common savings accounts offered

All banks offer a savings account. We asked the banks to name their most common product in this category. The table below offers an overview of the results.

Table 9: What is the name of the most common SAVING ACCOUNT you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	Deposito
Banco di Caribe N.V. (BdC)	Savings Account
CIBC First Caribbean Bank (CIBC)	Platinum Savings Account
Girobank N.V.(GIRO)	Regular Saving
Maduro & Curiel's Bank N.V. (MCB)	Savings statement
ORCO Bank N.V. (ORCO)	Savings Account
PSB Bank (PSB)	Savings Passbook individual account
RBC Royal Bank N.V. (RBC)	Day to Day Savings Account
Vidanova Bank N.V. (VIDA)	Savings Account

Source: online survey among banks. Situation as of August 1, 2019.

3.3.3 Interest rates savings account

ACU offers the best interest rate on a savings account (2.5%). Banco di Caribe, MCB and RBC offer the lowest interest rate (0.5%).

We asked for the yearly interest rate, however, some banks have only indicated the Annual Percentage Yield (APY) instead of the interest rate. APYis the fixed interest rate per year: the total amount of interest you earn on your savings over a year, factoring in compounding interest (interest on interest).

All banks indicate a savings account cannot be overdrawn, except for ACU. When an ACU client does not have sufficient funds to process a standing order, a fee of ANG 15.90 is charged to the client for every occurrence. No rate is used if a client remains to have a negative balance.

Table 10: Interest rates for savings accounts.

2.5 Interest rates	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Interest rate in case of positive balance (positief saldo) account holder (yearly rate)	2.5%	0.5%	2.25%	1% ²³	0.5% ²⁴	1.5% ²⁵	1.8% ²⁶	0.5% ²⁷	0.75%
Interest rate in case of negative balance (negatief saldo) - autothorized overdrawn	N.A. ²⁸	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Interest rate in case of negative balance (negatief saldo) - unautothorized overdrawn	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'N.A.' means not available at this bank.

3.3.4 Administration fees savings account

Most banks don't charge a monthly administration fee for a savings account, accept for RBC (ANG 5.30) and ACU (ANG 1.59). Also debit cards for savings accounts are free of charge (if offered). The fees for receiving a paper statement for a savings account are the same as for a personal account (see paragraph 3.2.3.), except for Banco di Caribe: this is free of charge instead of the ANG 3.71 for receiving the paper banking statement for a personal account. All banks offer free digital banking statements, except PSB bank who does not offer online banking, but digital banking statements can be emailed for a monthly fee of ANG 2.21.

Table 11: Administration fees for savings accounts.

2.1 Administration fees	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Monthly administration fee for a savings account with 1 account holder	1.59	Free	Free	Free	Free	Free	Free	5.30	Free
Yearly fee debit card	Free	Free	Free	Free	Free	Free	N.A.	Free	Free
Paper banking statement (monthly fee to receive monthly by mail/post)	Free	Free	5.00	5.30	5.30	10.00	2.21	1.59	Free
Digital banking statement (receive a statement each month by email or download via online banking)	Free	Free	Free	Free	Free	Free	2.21	Free	Free

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

3.3.5 Charges deposit, withdrawal, transfer and bill payment costs savings account

We asked the banks about the fees for deposit, withdrawal, transfer and bill payment from a savings account in three different situations: at the counter of your bank, via online banking and at an ATM. With a few exceptions the fees and rates for a savings account are identical to the fees and rates for a personal account (see 3.2.4.), e.g. PSB does not offer a personal account, but with a savings account at PSB bank deposit, withdrawal, transfer and bill payment can be done at the counter (not online or at ATMs).

Generally speaking, the fees at the counter are much higher than when using online banking or an ATM. Differences are relatively large between banks. Just as with a personal account, MCB and RBC mostly charge the highest fees at the counter. At the ATM, most banks charge a fee for a cash withdrawal from their own account at an ATM of a different bank, but also from an ATM of their own bank. For ATM transactions, the level of the rate is sometimes different, depending on the type of ATM (Cashnet or Cirrus). MCB charges the highest

 $^{^{22}}$ CIBC added the following comment to this rate: "Interest rate = 2.25%, APY = 2.27%"

²³ Girobank added the following comment to this rate: "APY with a monthly accrual frequency on the minimum balance."

²⁴ MCB added the following comment to this rate: "o.5% per year"

²⁵ ORCO added the following comment to this rate: "Yearly interest rate, but calculated monthly and credited to the account on a monthly basis"

²⁶ PSP added the following comment to this rate: "1.8% per year and it is credited 1x per month."

 $^{^{27}}$ RBC indicated this is the APY.

²⁸ ACU added the following comment to this rate: "Only when a client does not have sufficient funds to process a standing order, a fee of ANG 15.90 is charged to the client for every occurrence. No rate is used if a client remains to have a negative balance."

rates for "bill payments" at both ATMs and the counter: respectively ANG 5.30 and ANG 1.06 for each bill paid. The table below offers an overview of the results.

Table 12: Charges deposit, withdrawal, transfer and bill payment for savings accounts.

2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of your bank	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA 29
Deposit on own account (local currency)	Free	Free	Free	Free	2.12	Free	Free	2.65	Free
Withdrawal from own account	Free	1.06	Free	Free	3.71	Free	Free	2.65	1.06
Transfer between own accounts at own bank	Free	Free	Free	Free	3.71	Free	Free	Free	Free
Transfer to third party account at same bank	1.59	2.65	Free	2.65	5.30	3.75	4.24	5.30	2.12 ³⁰
Transfer to third party account at other local bank	1.86 ⁹	4.24	N.A.	N.A.	5.30	3.75	5.00	5.30	3.18 ³¹
Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)	Free	2.65	Free	2.65 ³²	5.30	4.00	Free	2.65	N.A.
2.3 Charges deposit, withdraw, transfer and bill payment - through online banking	ACU	BdC	CIBC	GIRO	мсв	ORCO	PSB	RBC	VIDA
Transfer between own accounts at own bank	Free	Free	Free	Free	Free	Free	N.A.	Free	Free
Transfer to third party account at same bank	Free	1.06	Free	Free	Free	Free	N.A.	Free	1.06
Transfer to third party account at other local bank	Free	1.06	1.00 ³³	1.59	Free	Free	N.A.	1.59	1.06
Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)	Free	Free	Free	Free	Free	Free	N.A.	2.65	1.06
2.4 Charges deposit, withdraw, transfer and bill payment – at the ATM	ACU	BdC	CIBC	GIRO	мсв	ORCO	PSB	RBC	VIDA
Withdrawal from own account at ATM of own bank	0.75	1.06	Free	1.06	1.06	N.A.	N.A.	Free	1.06
Withdrawal from own account at ATM of different bank	1.75 ³⁴	2.12	Varia- ble ³⁵	2.12	2.12 Cash net, 4.72 Cirrus	1.50	N.A.	2.12 Cash net	2.12
Transfer between own accounts at own bank	Free	N.A.	Free	Free	Free	N.A.	N.A.	Free	Free
Transfer to third party account at same bank	N.A.	N.A.	N.A.	Free ³⁶	N.A.	N.A.	N.A.	N.A.	N.A.
Transfer to third party account at other local bank	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)	N.A.	N.A.	N.A.	Free	1.06	N.A.	N.A.	N.A.	N.A.

²⁹ VIDA added the following comment to these fees: "For more then 3x transactions per month on savings accounts a penalty fee of ANG 6.36 applies, for all applicable channels."

³⁰ VIDA added the following comment to this fee: "Not available at counter, but can be done via a transfer order (for which a form can be filled in by the customer and dropped off at the bank branch) for a fee of ANG 2.12."

³¹ VIDA added the following comment to this fee: "Not available at counter, but can be done via a transfer order (for which a form can be filled in by the customer and dropped off at the bank branch) for a fee of ANG 3.18."

³² GIRO added the following comment to this fee: "Except for Aqualectra, UTS, Digicel, Selikor, these are free."

 $^{^{33}}$ For transfers up to ANG 50.000. If the transferred amount is more than ANG 50.000, the fee is ANG 10.

³⁴ Is only possible with GIRO ATMs.

³⁵ CIBC added the following comment to this fee: "The fee varies from Bank to Bank. Each Bank stipulates the fee they charge for withdrawal at their ATM."

³⁶ For phone recharge/TopUp.

3.4 Results for savings deposits

3.4.1 What is a savings deposit and which costs are involved?

A savings deposit is a secure, low risk investment strategy. When you put your money in a savings deposit, you lock it away for a fixed term, to earn interest at a fixed rate. The catch is that you can't make withdrawals or deposits until that term is up. In this case we mean a regular savings deposit, that offers interest but cannot be used directly as money in the narrow sense of a medium of exchange.

A customer will deposit in an account agreeing not to withdraw their funds for a fixed period in return for a higher rate of interest paid on the account. The interest earned on a savings deposit is usually higher than that paid on standard savings accounts. The increased interest rate is because access to the money is limited for the timeframe of the term deposit. Common fees and rates that may be charged to a private customer, are:

Table 13: Common fees and rates for saving deposits.

Name rate / fee	Description
Monthly fee:	A monthly maintenance fee, which covers e.g. the cost of maintaining branch locations and i-person services.
Fixed interest rate per year in case of 1 or 5 year period:	Agreed rates of interest to be paid on the account. Typically, interest rates are proportional to the time until maturity. In other words, a one-year term deposit will likely pay a lower interest rate than a five-year term deposit so customers receive a higher rate for locking up their money with the bank for extended periods.
Withdrawal within the fixed interest period:	In some cases, the bank may allow the account holder early termination or withdrawal, but will charge a penalty fee.

3.4.2 The most common savings deposits

All banks offer a savings deposit. We asked the banks to name their most common product in this category. The table below offers an overview of the results.

Table 14: What is the name of the most common Savings Deposit you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	Term Deposit
Banco di Caribe N.V. (BdC)	Time Deposit
CIBC First Caribbean Bank (CIBC)	Term Deposit
Girobank N.V. (GIRO)	Time Deposit
Maduro & Curiel`s Bank N.V. (MCB)	Time Deposit
ORCO Bank N.V. (ORCO)	Time Deposit
PSB Bank (PSB)	Time Deposit
RBC Royal Bank N.V. (RBC)	Term deposit
Vidanova Bank N.V. (VIDA)	Termijn Deposito (Term Deposit)

Source: online survey among banks. Situation as of August 1, 2019.

3.4.3 Fees and interest rates savings deposit

Banks offer different savings deposits for different time periods. For this research, we assessed a 1-year fixed period and a 5-year fixed period. We asked for the fixed interest rate per year, what most banks expressed in Annual Percentage Yield (APY): the total amount of interest you earn on your savings over a year, factoring in compounding interest (interest on interest).

ACU offers the best fixed interest rate per year in case of a 1-year period (3%), ORCO offers the best fixed interest rate per year in case of a 5 year period (2.5%). None of the banks charge a monthly fee for a savings deposit. ACU, Banco di Caribe and CIBC indicate that a customer cannot withdraw within the fixed interest period, the other banks charge a penalty based on different calculations (see table below).

It is noteworthy to mention that for several banks (CIBC, MCB, ORCO and RBC) the annual interest on a regular savings account is higher than the annual interest on a savings deposit where the money is fixed and cannot be withdrawn in the meantime (see paragraph 3.3.3).

Table 15: Fees and interest rates savings deposit.

3. SAVINGS DEPOSITS	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Monthly fee for this product (with 1 account holder)	Free	Free	Free	Free	Free	Free	Free	Free	Free
Fixed interest rate per year in case of 1 year period (APY)	3% ³⁷	0.5%	1% ³⁷	1.75%	0.25%	1.25% ³⁷	1.8%	0.25%	1%
Fixed interest rate per year in case of 5 year period (APY)	N.A.	2%	1.8% ³⁷	3%	1%	2.5% ³⁷	Case by case basis	2.5%	2%

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

Penalty fees for withdrawal within the fixed interest period vary and all banks have different ways of calculating these fees. The table below provides the details. ACU, Banco di Caribe and CIBC indicate that withdrawal within the fixed interest period is not possible. VIDA charges the highest rate: 2% with a minimum of ANG 106 (RBC charges 0.25%, but with a minimum penalty fee of ANG 250).

Table 16: Penalty for withdrawal within the fixed interest period savings deposit.

Bank	Calculation of the penalty
ACU	A withdrawal of a part of the balance on the savings deposit is not possible. If a customer has a 1-year deposit and a balance of more than ANG 1.000 and she wants to close the deposit entirely, then she pays a penalty fee of 0,25% of the total amount.
BdC	Withdrawal within the fixed interest period is not allowed. A penalty is charged for cancellations prior to the maturity date.
CIBC	N.A.
GIRO	o.4% X the remaining months of the time deposit X principal amount, with a minimum penalty fee of ANG 100 and maximum of the total earned interest
МСВ	o.25% of the withdrawal amount
ORCO	1% of the withdrawal amount X the remaining period
PSB	The interest rate will be reduced by 1%. The 1% penalty is calculated over the deposit Face Amount (Capital)
RBC	The penalty fee is 0.25% and is calculated over the amount of the withdrawal with a minimum penalty fee of ANG 250
VIDA	The rate is 2% of the withdrawal amount, with a minimum of penalty amount of ANG 106.

³⁷ No response received from this bank during the consultation of the draft-report (see also § 2.5), if this is indeed the fixed interest rate per year expressed in the Annual Percentage Yield (APY).

3.5 Results for credit cards

3.5.1 What is a credit card and what costs are involved?

A credit card is a card that enables customers to make payments for goods and services and borrow money from the bank simultaneously, based on the customers promise to the bank to repay them for the amounts plus the other agreed charges. In this case we mean regular credit cards in ANG and in USD. A credit card in the local currency allows the customer to repay in the local currency and avoid to be charged an (unfavorable) conversion rate to convert to the home currency, plus to be charged a percentage for the privilege. Common fees and rates that may be charged to a private customer, are:

Table 17: Common fees and rates for credit cards.

Name rate / fee	Description			
Application fee:	An application fee is often charged on credit cards for people with bad credit.			
Processing fee:	A payments processing fee is what you pay your credit card processor (e.g. VISA or MASTERCARD) for use of the product. Typically, this fee is charged per transaction.			
Yearly fee credit card:	A fee for the privilege of carrying a specific credit card, credit cards that offer more benefits and perks tend to have higher fees.			
Late Payment fee:	A fee any time you make a payment after your credit card's due date, can be avoided by paying your credit card bill early or on time each month.			
Returned Payment fee:	If your credit card payment is returned by your bank, you might get charged a returned check fee from your credit card issuer as a penalty.			
Credit card balance protection:	Optional fee to cover minimum monthly payments on the credit card if the cardholder unable to pay due to injury or unemployment.			
Payment with credit card in store in and outside Curaçao:	Fee for payments in physical stores or shops.			
Online payment with credit card store based in and outside Curaçao:	Fee for payments at online stores.			
Cash withdrawal at ATM in and outside Curaçao:	A fee to take your money in cash from your credit card at an ATM (Automated Teller Machine).			
Conversion fee foreign currency:	Credit card transaction processors, such as Visa and MasterCard, charge this fee for any transaction that involves a foreign bank.			
Interest rate with balance up to or over authorized amount:	The bank pays the payee and then charges the cardholder interest over the time the money remains borrowed. The authorized amount is the approved amount of money to be charged. After transactions are approved, the authorized amount is deducted from the amount of available credit. Some banks charge a higher interest rate with balance over the authorized amount.			

3.5.2 Most common credit cards in ANG

Only MCB offers a credit card in ANG: the Kompa Leon (Classic) which can only be used in Curacao, Aruba and St. Maarten. The monthly interest rate with balance up to and over the authorized amount is 1.5%, which is comparable to the rates for USD credit cards. A credit card in ANG at MBC comes with a yearly fee of ANG 63.60. The late payment fee is ANG 15.90 and the credit card balance protection is 0.5%. While payments online and in stores are free of charge, the cash withdrawal rate is 3.18% with a minimum of ANG 10.60 at ATM's both in Curaçao, Aruba or St. Maarten.

3.5.3 Most common credit cards in USD

Almost all banks offer a credit card in USD, except for ACU and PSB. A credit card in USD can be used worldwide. We asked the banks to name their most common product in this category. The table below offers an overview of the results.

Table 18: What is the name of the most common Credit Card in USD you offer in Curação?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	N.A.
Banco di Caribe N.V. (BdC)	Master Card Classic and Visa Card Classic
CIBC First Caribbean Bank (CIBC)	Visa Platinum
Girobank N.V. (GIRO)	Visa Classic
Maduro & Curiel`s Bank N.V. (MCB)	VISA Classic and MasterCard Classic
ORCO Bank N.V. (ORCO)	VISA
PSB Bank (PSB)	N.A.
RBC Royal Bank N.V. (RBC)	RBC Visa Classic
Vidanova Bank N.V. (VIDA)	Credit Card

Source: online survey among banks. Situation as of August 1, 2019.

3.5.4 Interest rates credit cards in USD

The interest rate with balance up to and over the authorized amount is for all banks 18%, with an exception for GIRO that offers the lowest rate of 15%.

Table 19: Interest rates credit cards in USD.

4.3 Interest rates	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Interest rate with balance up to authorized amount	N.A.	18% ³⁸	18%	15%	18%	18%	N.A.	18%	18%
Interest rate with balance over authorized amount	N.A.	18% ³⁹	18%	15%	18 %	18%	N.A.	18%	N.A.

Source: online survey among banks. Situation as of August 1, 2019. 'N.A.' means not available at this bank.

3.5.5 Administration fees credit cards in USD

None of the banks charge an application or processing fee to the cardholder. Yearly fees for a VISA CARD CLASSIC range from USD 35 (ORCO and VIDA) to USD 40 (Banco di Caribe). RBC charges the highest late payment fee (2.5% with a minimum of USD 35) and the highest returned payment fee (USD 37.10). MCB charges the highest balance protection: 0.5%. Conversion fees vary, Banco di Caribe and MCB use the exchange rates of CBCS, RBC indicates not to charge additional fees and to use the conversion rate of 1.82 (incl. license fee).

 $^{^{38}}$ This is the base tariff at BdC. The actual interest rate differs on a customer basis.

³⁹ See previous footnote.

Table 20: Administration fees credit cards in USD.

4.1 Administration fees	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Application fee	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Processing fee	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Yearly fee credit card (for VISA CARD CLASSIC) ⁴⁰	N.A.	40.00	N.A. ⁴¹	37.10	37.10	35.00	N.A.	37.10	35.00
Late Payment fee	N.A.	25.00	16.67	12.72	15.90	Free	N.A.	2.5% (min. of USD 35.00)	12.00
Returned Payment fee	N.A.	Free	16.67	Free	Free	Free	N.A.	37.10	Free
Credit card balance protection (% per month on outstanding balance)	N.A.	0.4%	N.A.	0.3%	0.5%	0.3%	N.A.	0.5%	0.2% (min. of USD 3.00)

Source: online survey among banks. Situation as of August 1, 2019. Prices are in USD including tax (OB). Responses in ANG were calculated in USD using a conversion rate of 1.80 ANG = 1 USD. 'Free' means free of charge. 'N.A.' means not available at this bank.

3.5.6 Transaction fees credit cards in USD

While payments online and in stores are free of charge for the cardholder, the cash withdrawal rate and calculations vary e.g. USD 7.42 (GIRO) and 3.18% with a minimum of USD 10.60 (MCB) at ATM's both in and outside Curação.

For payments in a currency other than USD, exchanges <u>rates</u> apply, based on the exchanges rates of the Central Bank (Centrale Bank van Curação en Sint Maarten, CBCS). None of the banks charge conversion fees (costs that are charged by local banks to a cardholder if he / she pays with a card abroad in a currency other than USD).

Table 21: Transaction fees credit cards in USD.

4.2 Transaction fees	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Payment with credit card in store in Curaçao	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Payment with credit card in store outside Curação	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Online payment with credit card store based in Curação	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Online payment with credit card store based outside Curação	N.A.	Free	Free	Free	Free	Free	N.A.	Free	Free
Cash withdrawal at ATM (in and outside Curaçao)	N.A.	3% of with- drawal amount (min. of USD 8.50)	3% of with- drawal amount	7.42	3.18% of with- drawal amount (min. of USD 10.60)	10.00	N.A.	3% of with- drawal amount (min. of USD 5.00)	1.5% of with- drawal amount (min. of USD 7.50)
Conversion fee foreign currency	Free	Free	Free	Free	Free	Free	Free	Free	Free

Source: online survey among banks. Situation as of August 1, 2019. Prices are in USD including tax (OB). Responses in ANG were calculated in USD using a conversion rate of 1.80 ANG = 1 USD. 'Free' means free of charge. 'N.A.' means not available at this bank.

⁴⁰ Most banks offer several types of credit cards with different fees. For the yearly fee we compared the fees for the Visa Card Classic, which is offered by most banks.

⁴¹ CIBC added the following comment to this fee: "We only offer the VISA Platinum. The Yearly Fee in USD is \$150.00." The other fees stated in this table apply to this creditcard.

3.6 Results for money cards

3.6.1 What is a money card and what costs are involved?

A personalized pre-paid money card is an electronic payment card with money stored on it that allows you to pay for things or withdraw cash from an ATM. Prepaid money cards enable customers to buy online, without the interest costs that come with a credit card. Common fees and rates that may be charged to a private customer, are:

Table 22: Common fees and rates for money cards.

Name rate / fee	Description
Issuing fee:	fee for the service of issuing a money card
Replacement fee (lost, stolen or expired):	fee to replace lost, stolen or expired money card
Refund fee (lost, stolen or expired):	when your prepaid card is lost, stolen or expires, you might have to pay a fee so that you do not lose your money. The bank will refund the balance minus the fee.
Branch reload fee:	fee for adding money to your card at a branch of the bank.
Online banking reload fee:	fee for adding money to your card via online banking.
Payment with money card in store in and outside Curaçao:	fee for payments in physical stores or shops.
Online payment with money card store based in and outside Curação:	fee for payments at online stores.
Cash withdrawal at ATM in and outside Curaçao:	a fee to take your money in cash from your money card at an ATM (Automated Teller Machine).

3.6.2 The most common money cards in ANG

Only MCB offers a money card in ANG: the Kompa Leon Money Card which can only be used in Curaçao, Aruba and St. Maarten. The money card comes with a issuing fee of ANG 31.8o. The replacement fee for the money card (lost, stolen or expired) is ANG 31.8o. The refund fee (when lost stolen or expired) is ANG 10.6o, the branch reload fee is 5.3o and the personal online banking reload fee is ANG 2.12. While payments in stores (in and outside Curacao) and online (at webshops based in Curacao) are free of charge, the Online payment with money card in webshop based outside Curaçao (e.g. Amazon) is not available. The cash withdrawal fee is ANG 5.3o at ATM's both in and outside Curaçao.

3.6.3 The most common money cards in USD

We asked the banks to name their most common product in this category. The table below offers an overview of the results. Banco di Caribe, MCB, RBC and VIDANOVA offer a money card in USD.

Table 23: What is the name of the most common money card in USD you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	N.A.
Banco di Caribe N.V. (BdC)	Multi card
CIBC First Caribbean Bank (CIBC)	N.A.
Girobank N.V. (GIRO)	N.A.
Maduro & Curiel's Bank N.V. (MCB)	MasterCard Prepaid
ORCO Bank N.V. (ORCO)	N.A.
PSB Bank (PSB)	N.A.
RBC Royal Bank N.V. (RBC)	VISA Travel Money Card
Vidanova Bank N.V. (VIDA)	Pre-paid Card

Source: online survey among banks. Situation as of August 1, 2019.

3.6.4 Administration fees of money cards in USD

Administration fees vary per bank. MCB charges the highest issuing fee (USD 31.80), replacement fee (USD 31.80), refund fee (USD 10.60) and branch reload fee (USD 5.30). VIDA offers the best issuing fee (USD 7.95), replacement fee (USD 5.30), refund fee (USD 0) and personal online banking reload fee (USD 2.12, just like MCB). The table below offers an overview of the detailed results.

Table 24: Administration fees money cards in USD.

5.3 Administration fees	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Issuing fee	N.A.	25.00	N.A.	N.A.	31.80	N.A.	N.A.	10.00	7.95
Replacement fee (lost, stolen or expired)	N.A.	15.90	N.A.	N.A.	31.80	N.A.	N.A.	10.00	5.30
Refund fee (lost, stolen or expired)	N.A.	?42	N.A.	N.A.	10.60	N.A.	N.A.	10.00	Free
Branch reload fee	N.A.	N.A.	N.A.	N.A.	5.30	N.A.	N.A.	2.50	5.61
Personal online banking reload fee	N.A.	2.75	N.A.	N.A.	2.12	N.A.	N.A.	2.50	2.12

Source: online survey among banks. Situation as of August 1, 2019. Prices are in USD including tax (OB). Responses in ANG were calculated in USD using a conversion rate of 1.80 ANG = 1 USD. 'Free' means free of charge. 'N.A.' means not available at this bank.

3.6.5 Transaction fees of money cards in USD

While payments online and in stores are free of charge, the cash withdrawal rate ranges from USD 1.06 (VIDA) to 3% of the withdrawal amount with a minimum of USD 8 (Banco di Caribe). Conversion fees are free at all banks, except at VIDA, who charges 1% of the transaction amount.

For payments in a currency other than USD, exchanges <u>rates</u> apply, based on the exchanges rates of the Central Bank (Centrale Bank van Curaçao en Sint Maarten, CBCS). None of the banks charge conversion fees (costs that are charged by local banks to a cardholder if he / she pays with a card abroad in a currency other than USD), except for VIDA: their conversion fee on other currency to dollar is 1% of the transaction amount.

Table 25: Transaction fees of money cards in USD.

5.4 Transαction fees	ACU	BdC	CIBC	GIRO	мсв	ORCO	PSB	RBC	VIDA
Payment with money card in store in Curaçao	N.A.	Free	N.A.	N.A.	Free	N.A.	N.A.	Free	Free
Payment with money card in store outside Curaçao	N.A.	Free	N.A.	N.A.	Free	N.A.	N.A.	Free	Free
Online payment with money card in webshop based in Curaçao (e.g. Goisco)	N.A.	Free	N.A.	N.A.	Free	N.A.	N.A.	Free	Free
Online payment with money card in webshop based outside Curaçao (e.g. Amazone)	N.A.	Free	N.A.	N.A.	Free	N.A.	N.A.	Free	Free
Cash withdrawal at ATM in and outside Curaçao	N.A.	3% (min. of USD 8.00)	N.A.	N.A.	5.30	N.A.	N.A.	3.00	1.06
Conversion fee foreign currency	Free	Free	Free	Free	Free	Free	Free	Free	1% of trans- action amount

Source: online survey among banks. Situation as of August 1, 2019. Prices are in USD including tax (OB). Responses in ANG were calculated in USD using a conversion rate of 1.80 ANG = 1 USD. 'Free' means free of charge. 'N.A.' means not available at this bank.

⁴² No response received from Banco di Caribe during the consultation of the draft-report (see also § 2.5) on the amount of this fee.

3.7 Results for personal loans

3.7.1 What is a personal loan and what costs are involved?

A personal loan is money borrowed from a bank that you pay back in fixed monthly payments, typically over two to five years. Most personal loans are "unsecured": not backed by collateral. A secured loan backed by a car or house is typically cheaper, but you can lose the asset if you default. You usually can use the money for any reason. Common fees and rates that may be charged to a private customer, are:

Table 26: Common fees and rates for personal loans.

Name rate / fee	Description
APR:	Banks rates for loans can vary and are expressed in APR (Annual Percentage Rate) to allow fair comparison. APR measures the true cost of borrowing money. For loan holders, it includes the loan's interest rate, closing fees, and other costs associated with getting a loan. A lower APR rate is better. The APR varies based on the loan amount and the period. A restructure fee, consolidation fee, extension fee and late payment fee are by definition not included in the APR calculation. They are optional costs that are not charged to every consumer.
Closing fee:	a closing fee generally includes a lender's commission, a brokerage fee and other associated application costs. In Curacao, the closing fee must be included in the APR
Risk fee / Risk insurance:	fee for an insurance (sometimes handled in house) that offers security to banks when lending to highrisk borrowers. In Curacao, the risk fee must be included in the APR. ⁴³
Restructure fee:	charged when an existing loan is restructured or varied to assist a customer who cannot maintain current payments or wishes to restructure the loan. The bank and customer agree on an amount that the borrower can pay back.
Consolidation fee:	charged when taking out a new loan to pay off a number of debts. Multiple debts are combined into a single, larger piece of debt, usually with more favorable payoff terms. This could reduce the monthly payments and provide near term relief, but a lengthier term could mean paying more in total interest.
Extension fee:	fee charged by the bank for extending your loan. Extensions can vary from one to six months depending on your unique situation.
Late Payment fee:	penalty fee charged when your repayment is received past its due date.

To be able to compare the banks we asked the banks to provide the APR in case for the following scenario: "What is the APR (in %) in case of a personal loan of ANG 15.000,- repaid in full over a period of 36 months (for the most common personal loan you offer in Curacao)?"

3.7.2 The most common personal loans

All banks offer a personal loan. We asked the banks to name their most common product in this category. The table below offers an overview of the results.

Table 27: What is the name of the most common personal loan you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcoöperatie (ACU)	Fiansa komun
Banco di Caribe N.V. (BdC)	Personal Loan
CIBC First Caribbean Bank (CIBC)	Personal Loan
Girobank N.V.(GIRO)	Personal Loan
Maduro & Curiel's Bank N.V. (MCB)	Fiansa Personal
ORCO Bank N.V. (ORCO)	Personal Loan
PSB Bank (PSB)	Personal loan
RBC Royal Bank N.V. (RBC)	Personal loan
Vidanova Bank N.V. (VIDA)	Personal loan

Source: online survey among banks. Situation as of August 1, 2019.

⁴³ See the definition of 'Total cost of the credit to the consumer' in the Annual Percentage Rate provisions of the CBCS.

3.7.3 APR of personal loans

The results show large differences between APRs, ranging from 7.25% (ORCO) to 18.97% (RBC).

Based on the APR one should be able to calculate the total borrowing costs of the loan. During the consultation round we asked for an explanation of the APRs provided, and whether they are in accordance with the Guideline Annual Percentage Rate provisions or the CBCS⁴⁴. Based on the results, we are under the impression that the APR Provisions are not applied the same by every bank. We have not received enough clear and consistent answers from the banks to present a good comparison of the monthly and total borrowing costs.

Table 28: What is the APR (in %) in case of a personal loan of ANG 15.000 repaid in full over a period of 36 months / 3 years?

6.1 Interest rates	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
APR (in %)	17.02	13.79 ⁴⁵	8.30	15.96	15.55	7.25	14.28	18.97	9.41

Source: online survey among banks. Situation as of August 1, 2019. Prices and amounts are in ANG including tax (OB). Amounts are rounded to whole guilders.

3.7.4 Administration fees personal loans

The administrations fees for personal loans vary and all banks have different ways of calculating the fees. The tables below provides the details. Please note a restructure fee, consolidation fee, extension fee and late payment fee are by definition not included in the APR calculation. They are optional costs that are not charged to every consumer.

Table 29: Closing fees personal loans.

Bank	Amount	Included in APR and monthly payment?
ACU	1% of the loan amount	?46
BdC	1% (excl. OB) of the loan amount with a minimum of ANG 159	Yes
CIBC	Free	-
GIRO	1% of the loan amount if loan amount is > 15.000 + 6% OB If loan amount is < 15.000 = ANG 150 + 6% OB	Yes
МСВ	2% of the loan amount	Yes
ORCO	1% of the loan amount	? ⁴⁶
PSB	3% of the loan amount	Yes
RBC	1% of loan amount with a minimum of 600 + OB ⁴⁷	Yes
VIDA	o - 1% of the loan amount	? ⁴⁶

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge.

⁴⁴ See: https://cbcs.spin-cdn.com/media/legislation_guidelines/20190120_apr_provisions_2017.pdf

⁴⁵ BdC added the following comment to this fee: "This refers to the base tariff (basistarief) of a personal loan at BdC. The actual APR can differ per customer."

⁴⁶ No response received from this bank during the consultation of the draft-report (see also § 2.5).

⁴⁷ RBC added the following comment to this fee: "The fee is at least 600 guilders but is adjusted to align to APR standards (where applicable)."

Table 30: Additional costs (e.g. risk fees) that the customer must take into account involving a personal loan.

Bank	Additional costs that the customer must take into account involving a personal loan?	Included in APR?
ACU	One time administration fee of ANG 10.60. Risk fee: A monthly rate of 0.71 thousandth is incorporated in the monthly payment amount if the risk insurance is taken through ACU.	⁷⁴⁸
BdC	Risk Insurance	Yes
CIBC	No	-
GIRO	OB is 6% on closing fee Risk fee: 3% on loan amount	Yes
МСВ	Risk fee: 3% of loan amount. OB: 6% on Administration fee	Yes
ORCO	Risk fee: Premium for a risk insurance, premium depending on term of loan and amount insured	?48
PSB	Risk Insurance	Yes
RBC	No, there are no other mandatory fees; however, the client has the option to insure the loan i.e. creditor insure to cover death; permanent disability and/or critical illness. This cost would be including in the APR.	-
VIDA	? ⁴⁸	?48

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge.

Table 31: Restructure fees personal loans.

Bank	Restructure fee for personal loans lower than ANG 10.000	Restructure fee for personal loans above ANG 10.000
ACU	N.A.	N.A.
BdC	1% (excl. OB) of the loan amount with a minimum of ANG 159	1% (excl. OB) of the loan amount with a minimum of ANG 159
CIBC	Free	Free
GIRO	No specific fee, depending on clients financial situation a fee between 2% and 8 % might be changed or completely waived.	No specific fee, depending on clients financial situation a fee between 2% and 8 % might be changed or completely waived.
MCB ⁴⁹	Payoff term shorter than 6 months: 106.00 All other cases: 212.00 AOV pensioners: 0	Payoff term shorter than 6 months: 106.00 All other cases: 212.00 AOV pensioners: 0
ORCO	N.A.	1% of the loan amount
PSB ⁵⁰	350	Loans above 10.000: 750. Loans above 50.000: 2%* of principal amount with max. of 3.000. *Maybe negotiable depending on the specific circumstances of each case.
RBC	1% of loan amount with a minimum of 600 plus 100 flat fee + OB (The additional fee of 100 guilders is only applicable for clients who refinance under one year. In all other cases the 100 guilder fee is not charged)	1% of loan amount with a minimum of 600 plus 100 flat fee + OB
VIDA	o - 1% of loan amount	o - 1% of loan amount

 $^{^{48}}$ No response received from this bank during the consultation of the draft-report (see also § 2.5).

⁴⁹ MCB added the following comment to this fee: "Restructure fee not applicable for AOV Pensioners. If the loan end date is less that 6 months the restructure fee is ANG 106."

⁵⁰ PSB added the following comment to this fee: "With the second restructure of the same loan a 25% extra fee is applicable on the regular restructure fee."

Table 32: Consolidation fees personal loans.

Bank	Consolidation fee for personal loans lower than ANG 10.000	Consolidation fee for personal loans above ANG 10.000
ACU	N.A.	N.A.
BdC	1% (excl. OB) of the loan amount with a minimum of ANG 159	1% (excl. OB) of the loan amount with a minimum of ANG 159
CIBC	Free	Free
GIRO	14.9% annuity see example below: Case < 10.000 Closing fee = ANG 150, OB = 6%, Risk fee= ANG 300	14.9% annuity see examples below: Case ≥ 10.000 Closing fee = ANG 150, OB = 6%, Risk fee= ANG 300 Case > 15.000 Closing fee = 1% of loan amount, OB = 6%, Risk fee = 3% of loan amount
МСВ	for loans up to ANG 5.000: ANG 212 for loans between ANG 5.000 and 10.000: ANG 371	530
ORCO	N.A.	1% of the loan amount
PSB	A flat consolidation fee of 350	A flat consolidation fee of 350
RBC	1% of loan amount with a minimum of 600 + OB	1% of loan amount with a minimum of 600 + OB
VIDA	o - 1% of loan amount	o - 1% of loan amount

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

Table 33: Extension fees personal loans.

Bank	Amount
ACU	N.A.
BdC	1% (excl. OB) of the loan amount with a minimum of ANG 159
CIBC	Free
GIRO	Free
МСВ	N.A. ⁵¹
ORCO	N.A.
PSB	1% of the total outstanding amount
RBC	N.A. ⁵²
VIDA	o - 1% of loan amount

⁵¹ MCB added the following comment to this fee: "Extension is not possible, MCB restructures the loan."

⁵² RBC added the following comment to this fee: "We do not offer personal loan extensions. If a client is seeking additional funds, we will refinance the debt and categorize it under consolidation or restructure depending on if the request is to borrow additional funds."

Table 34: Late payment fees personal loans.

Bank	Amount
ACU	N.A.
BdC	18% per annum loan repayment overdue for more than 15 days
CIBC	ANG 30
GIRO	yearly 18% interest on late monthly amount
МСВ	10% of monthly payment (with a minimum fee of ANG 5)
ORCO	ANG 75
PSB	10% of the monthly payment (with a minimum fee of ANG 5)
RBC	3% of outstanding payment (with a minimum fee of ANG 120) applied after 10 days of loan being in arrear
VIDA	1% of repayment amount ⁵³

 $^{^{53}}$ VIDA added the following comment to this fee: "Late Payment fee to be implemented in 2019."

3.8 Results for car loans

3.8.1 What is a car loan and what costs are involved?

A car loan is a personal loan, the sum of money borrowed is used to purchase an automobile. A bank loans the borrower the cash it takes to purchase a vehicle. In return, the borrower agrees to pay back the bank the amount of the loan plus interest, usually in monthly payments, until the amount owed is fully paid off. Car loans are almost always secured loans, whose collateral is the vehicle itself. And that means that if the borrower fails to make his or her payments, the vehicle will be repossessed and sold to pay off the loan debt.

Common fees and rates that may be charged to a private consumer, are comparable to those for a personal loan. For a description of these rates we refer to paragraph 3.7.1. To be able to compare the banks we asked the banks to provide the APR in case for the following scenario: "What is the APR (in %) in case of a car loan of ANG 50.000 repaid in full over a period of 60 months (for the most common car loan you offer in Curacao)?"

3.8.2 Most common car loans

All banks offer a car loan. We asked the banks to name their most common product in this category. The table below offers an overview of the results.

Table 35: What is the name of the most common car loan you offer in Curaçao?

Bank	Name of the product
Algemene Spaar- en Kredietcooperatie (ACU)	Car loan
Banco di Caribe N.V. (BdC)	Car loan
CIBC First Caribbean Bank (CIBC)	Vehicle Loan
Girobank N.V.(GIRO)	Car loan
Maduro & Curiel`s Bank N.V. (MCB)	Fiansa di outo
ORCO Bank N.V. (ORCO)	Car loan
PSB Bank (PSB)	Car loan
RBC Royal Bank N.V. (RBC)	Car loan
Vidanova Bank N.V. (VIDA)	Car loan

Source: online survey among banks. Situation as of August 1, 2019.

3.8.3 APR of car loans

The results show large differences between APR rates, ranging from 5.64% (RBC) to 8.79% (MCB). Based on the APR one should be able to calculate the total borrowing costs of the loan. During the consultation round we asked for an explanation of the APRs provided, and whether they are in accordance with the Guideline Annual Percentage Rate provisions or the CBCS⁵⁴. Based on the results, we are under the impression that the APR Provisions are not applied the same by every bank. We have not received enough clear and consistent answers from the banks to present a good comparison of the monthly and total borrowing costs.

Table 36: What is the APR (in %) in case of a car loan of ANG 50.000 repaid in full over a period of 60 months / 5 years?

7.1 Interest rates	ACU	BdC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
APR (in %)	7.80 ⁵⁵	7.79	6.06	6.17	8.79	6.09	8.77	5.64	6.18

Source: online survey among banks. Situation as of August 1, 2019. Prices and amounts are in ANG including tax (OB). Amounts are rounded to whole guilders.

 $^{^{54}\,}See: https://cbcs.spin-cdn.com/media/legislation_guidelines/20190120_apr_provisions_2017.pdf$

⁵⁵ ACU added the following comment to this fee: "During the year, we provide different kind of specials which consists of a lower interest rate and a longer repayment period. Mega autoshow (special) is 5.04%. Please note that ACU has a variety of loan products with different kind of interest rate. The loan that was provided as a example in this case is a special that occurs every year during the autoshow. Other loans that ACU provides that has a different yearly interest rate is: 1. Car loans (new): 7.8%; 2. Car loans (2nd hand): 9%; 3. Study loan: 9%; 4. Specials: varies from 7 to 7.75%; 5. 'Aliviansa': 7.8% - refinancing loans. Take note that ACU uses the method of annuity."

3.8.4 Administration fees car loans

Administrations fees vary and all banks have different ways of calculating the fees. The tables below provide the details.

Table 37: Closing fees car loans.

Bank	Amount	Included in APR?
ACU	N.A.	-
BdC	1% of the loan amount with a minimum of ANG 159	Yes
CIBC	Free	-
GIRO	1% of loan amount	Yes
МСВ	159.00	Yes
ORCO	1% of loan amount	? ⁵⁷
PSB	3% of loan amount	Yes
RBC	1% of loan amount with a minimum of 600 + OB ⁵⁶	Yes
VIDA	o - 1% of loan amount	? ⁵⁷

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

Table 38: Additional costs (e.g. risk fees) that the customer must take into account involving a car loan.

Bank	Amount	Included in APR?
ACU	 One-time administration fee 10.60. A monthly rate of 0.71 thousandth is incorporated in the monthly payment amount if the risk insurance is taken through ACU. 	? 57
BdC	Risk insurance	Yes
CIBC	No	-
GIRO	1. OB is 6% on closing fee 2. Risk fee is 1% on car loan amount < than 30.000, if car loan amount is > 30.000 an external life insurance is required	Yes
MCB	Risk fee: 4% of loan amount	Yes
ORCO	Premium for a risk insurance, premium depending on term of loan and amount insured	?57
PSB	Risk Insurance	Yes
RBC	No additional cost charged by the bank. Clients should take vehicle insurance cost into account.	-
VIDA	? ⁵⁷	? ⁵⁷

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge.

⁵⁶ RBC added the following comment to this fee: "The fee is at least 600 guilders but is adjusted to align to APR standards (where applicable)."

⁵⁷ No response received from this bank during the consultation of the draft-report (see also § 2.5).

Table 39: Restructure fees car loans.

Bank	Restructure fee for car loans lower than ANG 10.000	Restructure fee for car loans above ANG 10.000
ACU	N.A.	N.A.
BdC	1% of the loan amount with a minimum of ANG 159	1% of the loan amount with a minimum of ANG 159
CIBC	Free	Free
GIRO	14.9% annuity Case loans <u><10.000:</u> <u>Closing fee = ANG 150, OB = 6%, Risk fee = 3% of loan amount</u>	14.9% annuity Case loans <15.000: Closing fee = ANG 150, OB = 6%, Risk fee = 3% of loan amount Case loans >15.000: Closing fee = 1% of loan amount, OB = 6%, Risk fee = 3% of loan amount
MCB ⁵⁸	Payoff term shorter than 6 months: 106.00 All other cases: 212.00 AOV pensioners: 0	Payoff term shorter than 6 months: 106.00 All other cases: 212.00 AOV pensioners: 0
ORCO	N.A.	N.A.
PSB ⁵⁹	350	Loans above 10.000: 750 Loans above 50.000: 2%* of principal amount with max. of 3.000 *Maybe negotiable depending on the specific circumstances of each case.
RBC	1% of loan amount with a minimum of 600 + 100 flat fee + OB (The additional fee of 100 guilders is only applicable for clients who refinance under one year. In all other cases the 100 guilder fee is not charged)	1% of loan amount with a minimum of 600 + 100 flat fee + OB
VIDA	o - 1% of loan amount	o - 1% of loan amount

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

Table 40: Consolidation fees car loans.

Bank	Consolidation fee for car loans lower than ANG 10.000	Consolidation fee for car loans above ANG 10.000
ACU	N.A.	N.A.
BdC	1% of the loan amount with a minimum of ANG 159	1% of the loan amount with a minimum of ANG 159
CIBC	Free	Free
GIRO	14.9% annuity Case loans <10.000: Closing fee = ANG 150, OB = 6%, Risk fee = 3% of loan amount	14.9% annuity Case loans <15.000: Closing fee = ANG 150, OB = 6%, Risk fee = 3% of loan amount Case loans >15.000: Closing fee = 1% of loan amount, OB = 6%, Risk fee = 3% of loan amount
МСВ	212 (< 5000) / 371 (>5000-10.000)	530
ORCO	N.A.	N.A.
PSB	350	350
RBC	1% of loan amount with a minimum of 600 + OB	1% of loan amount with a minimum of 600 + OB
VIDA	o - 1% of loan amount	o - 1% of loan amount

⁵⁸ MCB added the following comment to this fee: "Restructure fee not applicable for AOV Pensioners. If the loan end date is less that 6 months the restructure fee is ANG 106."

 $^{^{59}}$ With the second restructure of the same loan a 25% extra fee is applicable on the regular restructure fee.

Table 41: Extension fees car loans.

Bank	Extension fee
ACU	N.A.
BdC	1% of the loan amount with a minimum of ANG 159
CIBC	Free
GIRO	Free
МСВ	N.A. ⁶⁰
ORCO	N.A.
PSB	N.A.
RBC	N.A. ⁶¹
VIDA	o- 1% of loan amount

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB). 'Free' means free of charge. 'N.A.' means not available at this bank.

Table 42: Late payment fees car loans.

Bank	Amount
ACU	N.A.
BdC	18% per annum loan repayment applied after overdue for more than 15 days
CIBC	30
GIRO	18%
МСВ	10% of the monthly payment with a minimum of 5
ORCO	75
PSB	10% with a minimum of 5
RBC	3% of outstanding payment with a minimum of 120 applied after overdue for more than 10 days
VIDA	1% of repayment amount 62

 $^{^{60}}$ MCB added the following comment to this fee: "Extension is not possible, MCB restructures the loan."

⁶¹ RBC added the following comment to this fee: "We do not offer car loan extensions. If a client is seeking additional funds, we will refinance the debt and categorize it under consolidation or restructure depending on if the request is to borrow additional funds."

⁶² VIDA added the following comment to this fee: "Late Payment fee to be implemented in 2019. The term for re-payment of the car loan (new car) is longer than a personal loan, and the car serves as a collateral."

4. Conclusion

In this research we included a total of 129 different fees and rates related to 7 products and compared them for 9 different banks in Curaçao. The results show that differences in fees and rates between banks are relatively large, however, not one bank offers all the products on the lowest rates, and several banks do not offer all products. For the price-conscious consumer this means it pays off to shop around at different banks for different products.

Which of the seven products are offered by each bank?

For almost each personal banking product, consumers can choose between multiple banks

All nine banks offer savings accounts, savings deposits, personal loans and car loans in Curaçao. Current accounts and credit cards in US Dollar are offered by eight out of nine banks. PSB Bank does not offer these. Furthermore, four banks offer money cards in US Dollar. MCB is the only bank in Curaçao that offers credit and money cards in Antillean Guilders (ANG).

Who has the best and who has the least favorable rates?

There are large price-differences between banks for each product

The results of the survey show that for each personal banking product the differences in fees and rates between banks are relatively large. This means that consumers can save money by comparing the rates and fees of banks when buying a new product (or switching to another bank for the same product). Below, the conclusions for each personal banking product are described.

Who has the best and who has the least favorable rates for a personal account?

Every bank in Curação that provides personal accounts, offers Online Banking for free which customers can use for various services, such as downloading digital banking statements. The account holder also receives a debit card free of charge in order to make payments in shops or use an ATM. Banks charge customers fees and/or rates for the following services related to the personal account:

- maintaining the account for the customer;
- processing transactions, such as a transfer of funds or cash withdrawal from an ATM;
- lending money when the customer has a negative balance on the account (overdraft); and
- other services, such as sending paper banking statements by mail or replacing a lost debit card.

There is no bank that offers the best fees and rates for all of these services. Some banks charge relatively low transaction fees, while others are cheaper when providing overdraft facilities. Thus, the personal circumstances of the consumer – such as the number of transactions, use of online banking, account balance and need for optional services – determine which bank is the cheapest option.

ACU charges below-average fees and rates for many services. For example, there is no monthly administration fee and most transactions are processed free of charge. However, ACU is not a commercial bank but a credit union and has at least three limitations compared to other providers: (1) not everyone can become a customer, (2) ACU only offers transactions in ANG and not in USD or EUR and (3) only ATMs of the Girobank can be used.

Although transferring funds or paying bills is still possible at the counter of most banks, it is (much) more expensive than via online banking. At three providers (ACU, MCB and ORCO Bank) sending money to a third party account is free of charge via online banking.

Who has the best and who has the least favorable rates for a savings account?

ACU offers the highest interest rate (2,5% per year) but charges an administration fee of ANG 1,59 per month while most other banks provide savings accounts free of charge. **CIBC** offers the second-highest interest rate (2,25% per year) and charges no monthly administration fee. The lowest interest rate that a bank offers, is 0,5% annually (**Banco di Caribe, MCB** and **RBC**).

In Curacao, it is possible to transfer or withdraw money from a savings account – at the counter, via online banking or at an ATM - just like a personal account. Many transaction fees at a particular bank are the same as the transaction fees for personal accounts.

Who has the best and who has the least favorable rates for a savings deposit?

All banks provide savings deposits for free. **ACU** offers the highest interest rate in case of a 1-year term (3% per year) and **Girobank** offers the highest interest rate in case of a 5-year term (3% per year). ACU does not offer a 5-year fixed period savings deposit.

Consumers may want to withdraw part of their deposit before the fixed interest period expires. CIBC stated that an early withdrawal of money from a savings deposit was not possible. ACU stated that only a withdrawal of the full deposit is possible under certain conditions. The remaining banks use different methods to calculate the penalty fee. Which bank charges the lowest penalty fee depends on the specific situation of the consumer.

Who has the best and who has the least favorable rates for a credit card?

In Curaçao, the yearly fee that banks charge for a Visa Classic credit card is relatively similar, between USD 35 and USD 40 CIBC only offers a Visa Platinum credit card for USD 150 per year). The same applies for the interest to be paid on the credit card balance. Every bank charges an interest rate of 18% per year, except for the GIRO which charges 15% per year (up to the authorized credit amount).

However, larger differences between banks were found for *late payment fees*, *foreign currency conversion fees* and *cash advance fees*. For example, a consumer pays USD 12 at **VIDA** when he or she fails to pay the minimum amount due on time, whereas this fee is USD 35 or more at RBC Royal Bank.

Who has the best and who has the least favorable rates for a money card?

Overall, **VIDA** charges the lowest fees for owning and using a money card in US Dollar. For example, the issuing fee is USD 7,95 and the fee for loading extra money onto the card through online banking is USD 2,12. By comparison, the highest issuing fee that a bank charges, is USD 31,80 (**MCB**). Furthermore, Vidanova Bank doesn't charge a fee when refunding money in case of a lost card.

Who has the best and who has the least favorable rates for a personal loan?

RE-Quest asked the banks to provide the APR for a fictional personal loan of ANG 15.000 to be repaid in full over a period of 36 months. For this type of personal loan, **ORCO** has the lowest APR of 7,3%, the highest APR that a bank charges is 19,0% (**RBC**). We have received insufficient reliable information to present the monthly and total costs of the personal loans in this report.

The questionnaire also included some fees that banks may charge after the loan is provided, such as a late payment fee or a fee to restructure the loan. The survey showed that banks use different methods to calculate these fees. Which bank charges the lowest fee depends on the specific situation of the consumer. **CIBC** differs from the other banks in the sense that most of these services are provided for free.

Who has the best and who has the least favorable rates for a car loan?

For car loans, RE-Quest asked the banks to provide the APR for a fictional loan of ANG 50.000 to be repaid in full over a period of 60 months. For this type of car loan, **RBC Royal Bank** has the lowest APR of 5,6%, the highest APR that a bank charges is 8,8% (**MCB**). We have received insufficient reliable information to present the monthly and total costs of the car loans in this report.

Just like with personal loans, banks use different methods to calculate fees that may be charged after the loan is provided. For this product **CIBC** provides some of these services for free as well, such as restructuring or extending the loan.

Overview

Below we provide an overview with, for each product, one of the main fees the consumer most likely will want to assess first to compare the banks, e.g. interest rates and APRs. The fees and rates are in Antillean guilders (ANG) and include sales taxes (OB) as per 1 august 2019.

Table 43: Overview of a main fee per product a consumer most likely will want to compare.

Main Fee	ACU	BDC	CIBC	GIRO	МСВ	ORCO	PSB	RBC	VIDA
Offers Online Banking?	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
PERSONAL ACCOUNTS Monthly administration fee	Free	3.71	Free	3.50	3.71	3.50	N.A.	10.60	3.71
SAVINGS ACCOUNTS Yearly interest rate	2.5 %	0.5 %	2.25 %	1%	0.5 %	1.5%	1.8 %	0.5 %	0.75 %
SAVINGS DEPOSITS Yearly interest rate	3 %	0.5%	1%	1.74 %	0.25 %	1.25 %	2 %	0.25 %	1%
CREDIT CARDS in USD Yearly interest rate	N.A.	18 %	18 %	15 %	18 %	18%	N.A.	18%	18 %
MONEY CARDS in USD Issuing fee in USD	N.A.	25	N.A.	N.A.	31.80	N.A.	N.A.	10	7.95
PERSONAL LOAN Annual percentage rate (APR)	17 %	13.8%	8.3 %	16 %	15.6 %	7.3 %	14.3%	19 %	9.4%
CAR LOAN Annual percentage rate (APR)	7.8 %	7.8 %	6.1 %	6.2 %	8.8 %	6.1 %	8.8 %	5.6 %	6.2 %

Source: online survey among banks. Situation as of August 1, 2019. Prices are in ANG including tax (OB), unless indicated otherwise. 'Free' means free of charge. 'N.A.' means not available at this bank.

It is noteworthy that for several banks (CIBC, MCB, ORCO and RBC) the annual interest on a regular savings account is higher than the annual interest on a saving deposit where the money is fixed and cannot be withdrawn in the meantime.

Personal circumstances and preferences matter when choosing a bank

The information in this report enables the reader to make a price-comparison between banks on a general level. This research shows that the level of price-competition that each bank exerts, differs per personal banking product. Therefore, price-oriented consumers could save money by shopping at multiple banks. Please note that this research did not take into account the *switching costs* - including time and effort – that consumers who already bought a similar product face.

In practice, the personal circumstances and preferences differ between consumers which influences their choice for a specific bank. For example, banks may charge lower fees for students or charge a risk premium for certain customers that apply for a loan. Also, banks may offer specials during campaign periods, discounts if a customer buys multiple financial products from them, or are prepared to match competitive offers to retain or win clients. Finally, consumers may choose a more expensive bank because they perceive a higher solvency of a bank, a higher quality of service or better ATM-availability.

Post script: Girobank

Several developments at Girobank were in the news during the completion of this report, after all the data had been collected, regarding the solvency of Girobank.

Girobank has been under guardianship of the Central Bank of Curaçao and Sint Maarten (CBCS) for the past six years. During these six years the Girobank was providing services to the public like any other bank. For this reason, Girobank was included as part of this research. The Girobank honored our request for information and verified their fees and rates included in a final draft-version of this report.

The objective of this research is to compare the fees and rates of personal banking products in Curação and make them transparent and understandable for the consumer. Taking into account this objective there was no immediate reason to exclude the information provided by Girobank from this report.

Appendix 1: Invitation letter for participating in the Banking Survey



Research & Consultancy

<name bank>
Board of Directors
<address bank>
Curacao

February 11th, 2019

Dear Sir or Madam,

RE-Quest Research & Consultancy B.V. Hoogstraat 18-22 Curação

Renske R. Pin, PhD | (+5999) 6615315 | renskepin@requestcaribbean.com | www.requestcaribbean.com| www.facebook.com/requestcaribbean|

We would like to invite you to participate in our research on banking costs in Curação. This research will take place in the period from February to May 2019.

The objective of this research is to gather information and compare the rates of certain (retail) banking products in Curaçao. The result will be an overview of the costs of seven bank products and a comparison of nine banks. The gathered information will be presented in a digital report and will be publicly available. The report will be written in English.

This research is executed by RE-Quest Research & Consultancy, an independent research company based in Curaçao, commissioned by the Fundashon pa Konsumidó (FpK) and the Fair Trade Authority Curaçao (FTAC). The FpK will use the results of this research to inform the Curaçao consumers through a tariff comparative publication and the FTAC will use the results for their oversight of the National Ordinance on competition. In this research we apply an online survey approach. You can find the guidelines of the research in the attachment.

We would like to invite your bank to participate in this research by filling out an online survey before March 8th.

Click here to start the survey: www.tinyurl.com/BANKING-COSTS

Filling out this online survey will take about 60 minutes assuming that the requested information about rates is readily available within your organization. You will receive your completed survey by email. After submitting the online survey we will verify the information as filled out with you. Furthermore, we will inform you/your organization on the results of the report before publication, so you can indicate any substantive inaccuracies.

We thank you for your co-operation. If you have any questions about this research, you can contact me at info@requestcaribbean.com.

Sincerely,

Renske Pin, PhD.
Director RE-Quest Research & Consultancy

Attachment - Research Guide Lines

The following nine banks in Curação will be included in this research (in alphabetic order):

- Algemene Spaar- en Kredietcoöperatie (ACU)
- Banco di Caribe N.V. (BdC)
- CIBC First Caribbean Bank (CIBC)
- Girobank N.V. (GIRO)
- Maduro & Curiel's Bank N.V. (MCB)
- ORCO Bank N.V. (ORCO)
- PSB Bank (PSB)
- RBC Royal Bank N.V. (RBC)
- Vidanova Bank N.V. (VIDA)

Each bank will be asked about their rates & fees in relation to the following products (if applicable):

- Payment account and payment services
- Savings account
- Savings deposits
- Credit card
- Money card
- Personal loan
- Car loan

The survey assesses, as much as possible, the current <u>standard</u> rates for every product. Special offers are excluded from the scope of the survey. Furthermore, this research focusses on the <u>private</u> customer, not the business customer, and only local residents. In some cases, such as loans, the product rates are assessed using a specific script or situation to be able to compare the rates.

Instructions filling out the survey

The survey can be accessed by clicking on the following link: www.tinyurl.com/BANKING-COSTS

- No signing in is required.
- After submitting, a copy of your responses will be emailed to the address you provided in the survey. In this email you will find a button to edit your response if needed.
- If you have any difficulties filling out the survey, email us at info@requestcaribbean.com

Appendix 2: Overview of assessed rates and fees

	a DAVMENT / CHIDDENT / DEDCONAL ACCOUNTS
	1. PAYMENT / CURRENT / PERSONAL ACCOUNTS 1.1 Administration fees
1	Monthly administration fee for a personal account with 1 account holder
2	Yearly fee debit card
3	Monthly fee to receive a paper statement each month by mail/post
4	Monthly fee to receive a digital statement each month by email
5	Fee to download digital statements via online banking
	1.2 Charges deposit, withdrawal, transfer and bill payment - at the counter of the bank -
6	Deposit on own account
7	Withdrawal from own account
8	Transfer between own accounts at own bank
9	Transfer to third party account at same bank
10	Transfer to third party account at other local bank
11	Standing order to third party account at same bank
12	Standing order to third party account at other local bank
13	Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)
	1.3 Charges deposit, withdraw, transfer and bill payment – through online banking –
14	Transfer between own accounts at own bank
15	Transfer to third party account at same bank
16	Transfer to third party account at other local bank Standing order to third party account at same bank
17 18	Standing order to third party account at same bank Standing order to third party account at other local bank
	Standing order to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)
19	1.4 Charges deposit, withdraw, transfer and bill payment – at the ATM –
20	Withdrawal from own account at ATM of own bank
21	Withdrawal from own account at ATM of different bank
22	Transfer between own accounts at own bank
23	Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)
J	1.5 Interest rates
24	Interest rate in case of positive balance (positief saldo) account holder
25	Interest rate in case of negative balance (negatief saldo) - authorized overdrawn
26	Interest rate in case of negative balance (negatief saldo) - unauthorized overdrawn
	J
-	1.6 Replacement
27	1.6 Replacement New debit card
27 28	1.6 Replacement New debit card Renewal debit card
27 28 29	1.6 Replacement New debit card Renewal debit card Replace lost debit card
27 28	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token
27 28 29	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT
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27 28 29 30 31 32 33 34 35 36 37 38 39	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer between own account at same bank Transfer to third party account at same bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)
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27 28 29 30 31 32 33 34 35 36 37 38 39 40 41	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer between own accounts at own bank Transfer between own accounts at own bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer between own accounts at own bank Transfer between own accounts at own bank Transfer to third party account at same bank Transfer between own accounts at own bank Transfer to third party account at same bank Transfer to third party account at same bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own accounts at own bank Transfer between own account at same bank Transfer to third party account at same bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer between own accounts at own bank Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra)
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost tePass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at same bank Transfer to third party account at som bank Transfer to third party account at own bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.4 Charges deposit, withdraw, transfer and bill payment - at the ATM -
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own accounts at own bank Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.4 Charges deposit, withdraw, transfer and bill payment - at the ATM - Withdrawal from own account at ATM of own bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2. 1. Administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2. 2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own accounts at own bank Transfer between own account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer between own accounts at own bank Transfer to third party account at same bank Transfer to third party account at the local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.4 Charges deposit, withdraw, transfer and bill payment - at the ATM - Withdrawal from own account at ATM of own bank Withdrawal from own account at ATM of different bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2. 1.4 Administration fees Monthly administration fees Monthly et o receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2. 2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own accounts at own bank Transfer between own accounts at own bank Transfer to third party account at same bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2. 3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer between own accounts at own bank Transfer to third party account at same bank Transfer to third party account at own bank Transfer between own accounts at own bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.2 (Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.4 (Charges deposit, withdraw, transfer and bill payment - at the ATM - Withdrawal from own account at ATM of own bank Withdrawal from own account at ATM of different bank Transfer between own account at ATM of different bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer between own accounts at own bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at same bank Transfer to third party account at ATM of own bank Withdrawal from own account at ATM of own bank Transfer between own account at ATM of own bank Transfer between own account at ATM of own bank Transfer between own account at ATM of different bank Transfer to third party account at ATM of different bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fees Monthly administration fee account with 1 account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own accounts Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at same bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.4 Charges deposit, withdraw, transfer and bill payment - at the ATM - Withdrawal from own account at ATM of own bank Withdrawal from own account at ATM of own bank Transfer to third party account at same bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank Transfer to third party account at atme bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank Transfer to third party account at atme bank Transfer to third party account at own bank Transfer to third party account at own bank Transfer to third party account at own bank
27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 45 46 47 48 49	1.6 Replacement New debit card Renewal debit card Replace lost debit card Replace lost E-Pass/Online banking token 2. SAVINGS ACCOUNT 2.1 Administration fees Monthly administration fee account with account holder Yearly fee debit card Monthly fee to receive a paper statement each month by mail/post Monthly fee to receive a digital statement each month by email Fee to download digital statements via online banking 2.2 Charges deposit, withdraw, transfer and bill payment - at the counter of the bank - Deposit on own account Withdrawal from own account Transfer between own accounts at own bank Transfer to third party account at other local bank Bill payment (e.g. UTS, TDS, TRES, FLOW, Curgas, Aqualectra) 2.3 Charges deposit, withdraw, transfer and bill payment - through online banking - Transfer to third party account at same bank Transfer to third party account at ATM of own bank Withdrawal from own account at ATM of own bank Transfer between own account at ATM of own bank Transfer between own account at ATM of own bank Transfer between own account at ATM of different bank Transfer to third party account at ATM of different bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank Transfer to third party account at ATM of own bank

52	Interest rate in case of positive balance (positief saldo) account holder
53	Interest rate in case of positive balance (positive saldo) account holder
54	Interest rate in case of negative balance (negatief saldo) - unautothorized overdrawn
	3. SAVINGS DEPOSITS
	3.1 Fees and interest rates
55	Monthly fee for this product (with 1 account holder)
56	Withdrawal within the fixed interest period Fixed interest rate per year in case of 1 year period
57 58	Fixed interest rate per year in case of 1 year period Fixed interest rate per year in case of 5 year period
_50	4a. CREDIT CARDS in ANG
	4.1 Administration fees
59	Application fee
60	Processing fee
61	Yearly fee credit card
62 63	Late Payment fee Returned Payment fee
64	Credit card balance protection
- 04	4.2 Transaction fees
65	Payment with credit card in store in Curação
66	Payment with credit card in store outside Curação
67	Online payment with credit card store based in Curação
68	Online payment with credit card store based outside Curação
69 70	Cash withdrawal at ATM in Curaçao Cash withdrawal at ATM outside Curaçao
70	4.3 Interest rates
71	Interest rate with balance up to authorized amount
72	Interest rate with balance over authorized amount
	4b. CREDIT CARDS in USD
	4.1 Administration fees
73	Application fee Processing fee
74 75	Yearly fee credit card
76	Late Payment fee
77	Returned Payment fee
78	Conversion fee foreign currency
79	Credit card balance protection
8o	4.2 Transaction fees Payment with credit card in store in Curação
81	Payment with credit card in store outside Curação
82	Online payment with credit card store based in Curação
83	Online payment with credit card store based outside Curação
84	Cash withdrawal at ATM in Curaçao
85	Cash withdrawal at ATM outside Curação
0.6	4.3 Interest rates
86 87	Interest rate with balance up to authorized amount Interest rate with balance over authorized amount
- 07	sa. MONEY CARDS in ANG
	5.1 Administration fees
88	Issuing fee
89	Replacement fee (lost, stolen or expired)
90	Reloading fee ANG Money Card
91	Refund fee (lost, stolen or expired) ANG Money Card Personal online banking reload fee
92 93	Branch reload fee ANG Money Card
33	5.2 Transaction fees
94	Payment with money card in store in Curação
95	Payment with money card in store outside Curação
96	Online payment with money card store based in Curação
97	Online payment with money card store based outside Curação
98	Cash withdrawal at ATM in Curaçao Cash withdrawal at ATM outside Curaçao
99	5b. MONEY CARDS in USD
	5.1 Administration fees
100	Issuing fee
101	Replacement fee (lost, stolen or expired)
102	Reloading fee ANG Money Card
103	Refund fee (lost, stolen or expired) ANG Money Card
104	Personal online banking reload fee

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105	Branch reload fee ANG Money Card
	5.2 Transaction fees
106	Payment with money card in store in Curaçao
107	Payment with money card in store outside Curaçao
108	Online payment with money card store based in Curaçao
109	Online payment with money card store based outside Curaçao
110	Cash withdrawal at ATM in Curaçao
111	Cash withdrawal at ATM outside Curaçao
	6. PERSONAL LOANS
	6.1 Interest rates
112	What is the APR (in %) in case of a personal loan of ANG 15.000,- repaid in full over a period of 36 months (for the loan you
	indicated in the previous question)
	6.2 Administration fees
113	Closing fee
114	Any additional costs that the customer must take into account
115	Restructure fee for personal loans lower than ANG 10.000,-
116	Restructure fee for personal loans above the amount of ANG 10.000,-
117	Consolidation fee for personal loans lower than ANG. 10.000,-
118	Consolidation fee for personal loans above the amount of ANG. 10.000,-
119	Extension fee
120	Late Payment Fee
	7. CAR LOANS
	7.1 Interest rates
121	What is the APR (in %) in case of a car loan of ANG 50.000, - repaid in full over a period of 60 months (for the loan you indicated in
	the previous question)
	7.2 Administration fees
122	Closing fee
123	Any additional costs that the customer must take into account
124	Restructure fee for car loans lower than ANG 10.000,-
125	Restructure fee for car loans above the amount of ANG 10.000,-
126	Consolidation fee for car loans lower than ANG. 10.000,-
127	Consolidation car fee for loans above the amount of ANG. 10.000,-
128	Extension fee
129	Late Payment Fee

