

# CCPA Privacy Notice / Notice At Collection

Last updated January 2025

This California Consumer Privacy Act Notice at Collection ("Notice") is provided by Sterling Capital Management LLC ("Sterling Capital"), an indirect, wholly-owned subsidiary of Guardian Capital Group Limited ("Guardian Capital").

Maintaining the privacy and security of your personal information is Sterling Capital's highest priority. In doing so, we want to provide transparency regarding how and why your data is collected, how it is used, with whom it may be shared, and how long it is kept. This notice, as well as Sterling Capital's Consumer Privacy Notice and Statement of Online Privacy Practices located [here](#) informs consumers how we will interact with your personal information.

The purpose of this Notice is to provide you with timely notice, at or before the point of collection, of the details about our practices concerning the privacy of your personal information. This Notice is directed to consumers who reside in the state of California ("consumers" or "you") and relates to personal information covered by the California Consumer Privacy Act (CCPA). Specifically, this Notice provides comprehensive information about our online and offline practices, along with details concerning how you may exercise your California privacy rights and make requests to access, correct, or delete the information that Sterling Capital holds about you. We will not collect additional categories of personal information without providing you a new Notice at Collection disclosing these categories.

Please note that Sterling Capital adheres to an exemption within the CCPA for data collected pursuant to the Gramm-Leach-Bliley Act (GLBA). This Notice and the rights described do not apply to information covered by GLBA, including information we collect when you obtain our financial products and services for personal, family, or household purposes, which is subject to our Consumer Privacy Notice found [here](#).

The following charts provide specifics about Sterling Capital's practices related to the collection, use, and selling or sharing of personal information:

## General Personal Information

Categories of Personal Information Collected & Disclosed	Purpose for Collection	Purpose for Disclosure
<p><b>A. Identifiers:</b> For example, real name or alias, address, online identifier, IP address, email address, account name, SSN, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> <li>▪ Manage fraud and financial crimes</li> <li>▪ Assess and manage risk</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate / organizational performance and staffing</li> <li>▪ Perform services on behalf of another entity or business</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from "purpose for collection", plus:</li> <li>▪ Share personal information with service providers that provide various services to us</li> </ul>

<p><b>B. Personal Information Categories from Cal. Civ. Code § 1798.801:</b> For example, name, signature, SSN, physical characteristics or description, address, phone number, passport number, driver’s license or state ID card number, policy or account numbers, education, employment, employment history, credit, or debit card numbers, or any other financial, medical or health insurance information.</p>	<ul style="list-style-type: none"> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> <li>▪ Assess and manage risk</li> <li>▪ Manage fraud and financial crimes</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate/organizational performance and staffing</li> <li>▪ Perform services on behalf of another entity or business</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> <li>▪ Share personal information with service providers that provide various services to us</li> </ul>
<p><b>C. Characteristics of CA or Federal Protected Classifications:</b> For example, race, religion, national origin), age (40 and over), gender, sexual orientation, medical condition, ancestry, pregnancy (includes childbirth, breastfeeding and/or related medical conditions), familial status, disability, veteran status, or genetic information.</p>	<ul style="list-style-type: none"> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate/organizational performance and staffing</li> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> </ul>
<p><b>D. Commercial Information:</b> For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> <li>▪ Deliver, manage and support products and services, manage relationships and maintain accounts</li> <li>▪ Assess and manage risk</li> <li>▪ Manage fraud and financial crimes</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Share for all purposes from “purpose for collection”</li> </ul>
<p><b>E. Biometric Information:</b> For example, physiological, biological, or behavioral characteristics, including DNA, that can be used to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	<p>N/A</p>	<p>N/A</p>
<p><b>F. Internet or Other Similar Network Activity:</b> For example, browsing history, search history, and information regarding a consumer’s</p>	<ul style="list-style-type: none"> <li>▪ Manage fraud and financial crimes</li> <li>▪ Manage teammate and organizational performance and staffing</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> </ul>

<p>interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> <li>▪ Meet legal, regulatory or compliance requirements</li> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> </ul>	
<p><b>G. Geolocation Data:</b> For example, information that can be used to determine a device’s physical location.</p>	<p>N/A</p>	<p>N/A</p>
<p><b>H. Sensory Data or Recordings:</b> For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household.</p>	<p>N/A</p>	<p>N/A</p>
<p><b>I. Professional or Employment-Related Information:</b> For example, compensation, evaluations, performance reviews, personnel files and current and past job history.</p>	<ul style="list-style-type: none"> <li>▪ Manage teammate and organizational performance and staffing</li> <li>▪ Meet legal, regulatory or compliance requirements</li> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate/organizational performance and staffing</li> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> </ul>
<p><b>J. Education Information</b> (defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)): Education records directly related to a student maintained by an education institution or party acting on its behalf, for example, non-public information that can be used to distinguish or trace an individual’s identity in relation to an educational institution either directly or indirectly through linkages with other information.</p>	<ul style="list-style-type: none"> <li>▪ Assess and manage risk</li> <li>▪ Deliver, manage and support products and services, managing relationships and maintaining accounts</li> <li>▪ Manage hiring and ongoing employment needs such as benefits</li> <li>▪ Maintain records around continuing education</li> <li>▪ Perform services on behalf of another entity or business</li> <li>▪ Meet legal, regulatory or compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> </ul>
<p><b>K. Profile Data:</b> For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions,</p>	<ul style="list-style-type: none"> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate/organizational performance and staffing</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from “purpose for collection”</li> </ul>

behavior, attitudes, intelligence, abilities, and aptitudes.		
--	--	--

We may also disclose personal information for other purposes at your direction or with your consent.

### Sensitive Personal Information

Categories of Sensitive Personal Information	Purpose for Collection	Purpose for Disclosure
<b>SSN, Driver's License, State ID Card, Passport Number</b>	<ul style="list-style-type: none"> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> <li>▪ Manage fraud and financial crimes</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate /organizational performance and staffing</li> <li>▪ Perform services on behalf of another business or entity</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from "purpose for collection", plus:</li> <li>▪ Share personal information with service providers that provide various services to us</li> <li>▪ Share personal information with service providers that provide various employment and benefits services to us</li> </ul>
<b>Account Login, financial account, debit, or credit card number when provided with any security or access code, password or credentials allowing access to an account</b>	<ul style="list-style-type: none"> <li>▪ Deliver, manage, and support products and services, manage relationships, and maintain accounts</li> <li>▪ Manage fraud and financial crimes</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from "purpose for collection", plus:</li> <li>▪ Share personal information with service providers that provide various services to us</li> <li>▪ Share personal information with service providers that provide various employment and benefits services to us</li> </ul>
<b>Precise geolocation</b>	N/A	N/A
<b>Racial or ethnic origin, religious or philosophical beliefs, or union membership</b>	<ul style="list-style-type: none"> <li>▪ Manage hiring and ongoing employment, such as benefits, and to manage teammate/organizational performance and staffing</li> <li>▪ Meet legal, regulatory, or compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ All purposes from "purpose for collection"</li> </ul>
<b>Contents of a consumer's mail, email, and text messages (unless Sterling Capital is the intended recipient)</b>	N/A	N/A
<b>Genetic Data</b>	N/A	N/A
<b>Biometric information for the purpose of unique identification</b>	N/A	N/A
<b>Health information</b>	<ul style="list-style-type: none"> <li>▪ Manage ongoing employment needs such as benefits</li> </ul>	<ul style="list-style-type: none"> <li>▪ Share for all purposes from "purpose for collection"</li> </ul>

<b>Information concerning sex life or sexual orientation</b>	N/A	N/A
--	-----	-----

**What we Sell to Third Parties or Share with Third Parties for Cross-Context Behavioral Advertising and What we Share with Third Parties for Business Purposes**

We have not sold or shared with third parties for cross-context behavioral advertising personal information to third parties in the preceding 12 months as disclosed in the table below. We share personal information for business purposes with the third parties as described below.

**General Personal Information**

<b>Categories sold to or shared with third parties over the last 12 months</b>	<b>Categories of third parties to whom this category of personal information has been sold or shared</b>	<b>Categories of Third Parties to whom the information was shared for business purposes that are not considered a sale or share under CA law</b>
<b>A. Identifiers</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Other parties when you authorize or direct us to share your information, such as when you use a third party service to help manage your financial information across financial institutions</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>B. Personal Information Categories from Cal. Civ. Code § 1798.80(e)</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Other parties when you authorize or direct us to share your information, such as when you use a third party service to help manage your financial information across financial institutions</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>C. Characteristics of CA or Federal Protected Classifications</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> <li>▪ Other parties when you authorize or direct us to share your information,</li> </ul>

		such as when you use a third party service to help manage your financial information across financial institutions
<b>D. Commercial Information</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Other parties when you authorize or direct us to share your information, such as when you use a third party service to help manage your financial information across financial institutions</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>E. Biometric Information</b>	N/A	N/A
<b>F. Internet or Other Similar Network Activity</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>G. Geolocation Data</b>	N/A	N/A
<b>H. Sensory Data or Recordings</b>	N/A	N/A
<b>I. Professional or Employment-Related Information</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>J. Education Information</b>	N/A	N/A
<b>K. Profile Data</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> </ul>

### Sensitive Personal Information

Categories sold to or shared with third parties over the last 12 months	Categories of third parties to whom this category of personal information has been sold or shared	Categories of third parties to whom the information was shared for business purposes that are not considered a sale or share under CA law
<b>Social Security Number, Driver's License, State Identification Card, or Passport Number</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> </ul>

		<ul style="list-style-type: none"> <li>▪ Service Providers that provide various services to us</li> <li>▪ Other parties when you authorize or direct us to share your information</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account</b>	N/A	N/A
<b>Precise geolocation</b>	N/A	N/A
<b>Racial or ethnic origin, religious or philosophical beliefs, or union membership</b>	N/A	N/A
<b>Contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication)</b>	N/A	N/A
<b>Genetic data</b>	N/A	N/A
<b>Biometric information for the purpose of unique identification</b>	N/A	N/A
<b>Health information</b>	N/A	<ul style="list-style-type: none"> <li>▪ Affiliates and other entities in the Guardian Capital family</li> <li>▪ Service Providers that provide various services to us</li> <li>▪ Other parties when you authorize or direct us to share your information</li> <li>▪ Government entities and other third parties as needed for legal or similar purposes</li> </ul>
<b>Information concerning sex life or sexual orientation</b>	N/A	N/A

### Notice of Right to Opt Out of Sale/Sharing

Sterling has not sold personal information to third parties in the preceding 12 months, including personal information of minors under the age of 16. Therefore, there is not an opt-out for the sale of data provided on our website, since there is no activity from which to opt out.

### Notice of Right to Limit Use of Sensitive Personal Information

CCPA provides you with a “right to limit” companies from using your sensitive personal information to infer characteristics about you for certain purposes – for example, for marketing. Since Sterling does not engage in any of those limitable activities, we do not provide a related opt out.

### Retention of Personal Information

Sterling Capital has established product and business-level criteria for retention and disposal according to business requirements, laws, regulations, and applicable industry standards.



## Sources of Personal Information

Sterling Capital collects information from various sources, including:

- Directly from you or your guardians/representatives
- Service providers that support our business operations (e.g., data analytics providers)
- Our affiliates or subsidiaries
- Public records or publicly available data
- Websites, mobile applications, and social media

## Consumer Rights Under the CCPA

- **Right to Know / See Data Request:** You have the right to request that Sterling Capital disclose categories or specific pieces of information we have collected about you over the last 12 months, the categories of sources from which that information was collected, the business or commercial purpose(s) for which the information was collected, sold, or shared with third parties for cross context behavioral advertising, and the categories of third parties with whom we share personal information.
- **Right to Correct:** You have the right to request correction of inaccurate information maintained by Sterling Capital. In many instances, such updates are best made by logging into your online account or employee portals, calling 877-835-4836 or visiting <https://sterlingcapital.com/legal/privacy/> and some corrections may require specific documentation to be provided as required by law. If you provide us documentation, it will only be used or maintained for the purpose of correcting the information and complying with our recordkeeping requirements under the CCPA. Sterling Capital also provides links and the privacy request line as described below.
- **Right to Delete:** You have the right to request deletion of personal information that Sterling Capital has collected, subject to certain exceptions. For example, we may deny your request if retaining the information is necessary for us to complete a transaction you requested or comply with our legal obligations.

## Submitting a Verified Consumer Request

Consumers are welcome to submit right to know, correction, or deletion requests by visiting our Consumer Rights Request Portal:

- To submit a request for yourself, click [here](#)
- To submit a request on behalf of another individual, click [here](#)

Individuals are also welcome to submit requests by calling 877-835-4836.

All requests must be verified prior to receiving a response, using Sterling Capital authentication protocols. Requesters will be asked to supply certain basic personal information to enable us to verify the request against our records, such as name, Social Security number, and address. Information submitted for verification purposes will only be used to verify the requestor's identity and/or authority to make a request on another's behalf.

Requests made on another person's behalf can only be accepted upon receipt of documentation that the requestor is an authorized agent, parent, or legal guardian of the consumer whose information is being requested. This will require the submission of a valid Power of Attorney, Birth Certificate, approved Sterling Capital authorization form, Guardianship Order, or other court order granting authority to receive information, as appropriate.

Upon submission of a request, consumers will receive an initial confirmation of receipt within 10 days. We will respond to your request within 45 days (unless an extension of up to 45 additional days is requested, upon which the consumer will receive notice and an explanation for the extension).

## Opt Out Preference Signals

Your internet browser may give you more control over your privacy preferences via a Global Privacy Control (GPC) signal. This is a setting in your browser that notifies the websites you visit of your preferences to opt out of selling or sharing your personal information under California law. If you have opted out via the GPC signal, Sterling Capital site(s) will recognize this signal and process your preference automatically as it pertains to tags, cookies and pixels that collect personal information when you visit [www.sterlingcapital.com](http://www.sterlingcapital.com). Please note, you will need to enable the signal on each browser that you use, as the signal is processed at the browser-level and is not applied if you visit [SterlingCapital.com](http://SterlingCapital.com) from a different browser or device that does not have the GPC signal enabled. To opt out without GPC enabled, see the section Notice of Right to Opt Out of Sale/Sharing above.



### Non-Discrimination

The submission of any CCPA request will have no impact on the service and/or pricing you receive from Sterling Capital. It will not result in any denial of goods or services, or different prices, rates or quality of goods or services, nor will it result in retaliation against an employee, applicant, or independent contractor.

### Consumers Under 16 Years of Age

Sterling Capital products and services are not intended for consumers under the age of 16, and we do not knowingly collect information from children under the age of 16 without consent. Sterling Capital does not knowingly sell the personal information of minors under the age of 16 or share such information for cross-contextual advertising.

### Automated Decision-Making

Sterling Capital does not engage in automated decision-making based on personal information.

### Privacy Center for Requests and Updating Preferences

Through the Sterling Capital [Personal Data Request](#), you can submit requests to see, delete, and edit information we've collected and update your sharing and marketing preferences.

### Updates

This Notice may be revised from time to time, so please review this page periodically. Any changes will become effective when we post the revised notice on the site (please note the effective date listed at the top of this page).

### Disclosure of Privacy Rights Requests

The CCPA requires businesses to disclose the number of requests received, complied with in whole or in part, or denied.

Data compiled for requests received from 1/1/2024 through 12/31/2024:

Request Type	Received	Complied	Denied	Average Days to Respond
Right to Access	0	N/A	N/A	N/A
Right to Delete	0	N/A	N/A	N/A

### Contact Us

If you have any questions or comments on this notice or our privacy practices generally, please contact us at 877-835-4836. You can also visit <https://sterlingcapital.com/legal/privacy/> for additional information.