

FACTS	WHAT DOES STERLING CAPITAL MANAGEMENT LLC DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and account transactions ▪ income and investment experience ▪ risk tolerance and assets <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Sterling Capital chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Sterling Capital share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus; or as permitted by law	Yes	No
For our marketing purposes — with service providers to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share
To limit our sharing	Please call 877-835-4836 to leave a message and a Sterling Capital representative will return your call. Please note: If you are a new client, we can begin sharing your information 30 days from the date we provided this notice. When you are no longer our client, we can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.	
Questions?	Please call 877-835-4836 to leave a message and a Sterling Capital representative will return your call.	

Who we are	
Who is providing this notice?	This notice is provided by Sterling Capital Management LLC.
What we do	
How does Sterling Capital protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Our employees are bound by our Code of Ethics and policies to access consumer information only for legitimate business purposes and to keep information about you confidential.
How does Sterling Capital collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> ▪ tell us about your investment or retirement portfolio or enter into an investment advisory contract ▪ seek advice about your investments or give us your income information ▪ give us your contact information
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes — information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Our affiliates include certain financial companies with a Desjardins or Guardian name such as Guardian Capital Limited, Guardian Capital LP and Desjardins Global Asset Management, Inc. Affiliates also include Alta Capital Management, LLC and Agincourt Capital Management, LLC.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ Sterling Capital does not share with nonaffiliates so they can market their services to you
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Sterling Capital does not jointly market
Other important information	
<p>You may have other privacy protections under some state laws. We will comply with applicable state laws as to information about you. Accounts with California and Vermont addresses will be treated as if you opted out of sharing information among our affiliates.</p> <p>California residents only: In addition to this Privacy Notice, please refer to the Sterling Capital California Consumer Privacy Act Privacy Notice located on Sterling's website at www.sterlingcapital.com.</p>	