

Sterling Capital Statement of Online Privacy Practices

About Sterling Capital

SterlingCapital.com provides information about products and services offered by Sterling Capital Management (“Sterling Capital”). The website is managed by Sterling Capital and this document details Sterling Capital’s online privacy practices when you visit SterlingCapital.com. While Sterling Capital is a subsidiary of Guardian Capital Group (“Guardian”), this policy does not apply to any other Guardian websites or any websites of other Guardian affiliates and subsidiaries, even if those websites are accessible through SterlingCapital.com.

Sterling Capital cares about the privacy and security of our clients’ personal information and protecting your information is consistent with our purpose, mission, and values. We believe it is helpful to have an overview of how this commitment is applied as Sterling Capital collects, uses, and protects your personal information when you visit us online.

Sterling Capital’s business address is 4350 Congress Street, Suite 1000, Charlotte, NC 28209, U.S.A.

What Does This Policy Cover?

This Sterling Capital Statement of Online Privacy Practices describes how we collect information when you visit or use Sterling Capital’s website. It also describes how we use and share such information and explains your privacy rights and choices. Our online services are intended for a U.S. audience. The terms “Sterling Capital,” “we,” “us,” or “our” mean Sterling Capital. “You” means an individual who visits SterlingCapital.com and does not refer to a business or other entity or to individuals outside the U.S.

What Isn’t Covered Under This Policy?

This policy does not apply to companies other than Sterling Capital, such as third-party websites to which we link online. Please review the privacy policies of other websites and services you visit to understand their privacy practices.

This policy does not apply to any other Guardian websites of other Guardian affiliates and subsidiaries, even if those websites are accessible through SterlingCapital.com.

What Information Do We Collect?

When you visit Sterling Capital’s website, we may collect the following information:

- Your browser type (e.g., Google Chrome, Microsoft Edge, Apple Safari, Mozilla Firefox).
- Your Internet Protocol or “IP” address or other unique device identifiers such as Media Access Control (MAC).
- The presence of any software on your device that may be necessary to view our site.
- Configuration information about the device you are using, including, but not limited to, your device type, web browser type and version, operating system type and version, display/screen settings, language preferences.
- Personal information submitted through forms, registrations and/or applications on website, including:
 - Name
 - Email Address
 - Telephone Number
 - Company
 - Title
 - Location (not GPS-level tracking)

- Usernames
- Passwords
- Financial professional, Institutional Investor, or Individual Investor identification
- Search engine traffic referral information.
- Website analytics information such as pages visited, and average time spent on a particular page.

How Do We Use the Information We Collect?

The information we collect online helps Sterling Capital to:

- Carry out day-to-day business operations.
- Enhance user experience through diagnosis of server, software, or technical problems.
- Analyze usage of various documents, data and pages on the site.
- Ensure that suitable content is provided to each user.
- Fulfill regulatory requirements.
- Send marketing communications:
 - Perform market research
 - Present personalized or targeted offers, ads, or content we believe may be of interest to you
 - Determine the effectiveness of promotional campaigns

Note: When you provide us your mobile telephone number, you authorize your wireless operator (AT&T, Sprint, T-Mobile, US Cellular, Verizon, or any other branded wireless operator) to use or disclose information about your account and wireless device, if available, to us or our service provider for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud. See the [Sterling Capital Privacy Notice](#) for how we treat your data.

How Do We Share the Information We Collect?

Sterling Capital shares your information in different ways as permitted and required by law. For example, we may share your information with:

- Affiliates and other entities in the Guardian family
- Businesses with which we partner to offer products and services for our clients or prospective customers
- Service providers that provide various services to us, such as those we use to help detect and prevent fraud, improve our online services, and to better market and advertise our services to you
- Other parties when you authorize or direct us to share your information
- Government entities and other third parties as needed for legal or similar purposes, such as:
 - To respond to requests from our regulators.
 - To respond to a warrant, subpoena, governmental audit or investigation, law enforcement request, legal order, or other legal process.
 - To facilitate a merger, acquisition, or sale.
 - To exercise or defend legal claims.

Please see the [Sterling Capital Privacy Notice](#) for information on how your personal information may be shared; and how you may be able to limit certain types of sharing. Please see the [Sterling Capital Privacy Notice](#) for the reasons we share your personal information.

Residents of California

The California Consumer Privacy Act Privacy Notice describes your privacy rights and explains how to exercise those rights. View the [Sterling Capital California Consumer Privacy Act Privacy Notice](#).

Individual Rights

If your account information is incomplete, inaccurate, or not current, please contact your client service representative or financial advisor. We may ask you to verify your identity to help us securely respond efficiently to your request.

What Technologies Do We Use?

Sterling Capital may employ various technologies to collect information, including:

- **Cookies:** Cookies are pieces of information stored directly on a device. Sterling Capital uses cookies to provide information for many purposes, including advertising, security, to facilitate navigation, to display information more effectively, and to personalize/customize online experience. Sterling Capital also uses cookies to make session navigation seamless, understand user behavior and collecting data for marketing.
 - **Salesforce cookie:** Extends the core Salesforce CRM features to the Sterling Capital website by integrating tools, automating tasks, and providing deeper client and prospect insights for sales employees and marketing – enabling real-time lead capture from web forms, personalized marketing and advertising, LinkedIn engagement integration, streamlining sales workflows, and connecting website interactions directly to Sterling Capital Salesforce profiles.
- **Cross-device tracking tools:** Cross-device tracking tools are a set of techniques used to help link a particular user across a number of devices, sometimes including non-computing devices (e.g., a smart television). While the specific techniques can vary, these often rely on combining a set of “deterministic” data, which is from a device in which a person provided a login and associated tools such as cookies, and associating activity using probabilistic, or statistical, techniques.
 - Sterling Capital uses **Google Analytics** to understand user behavior, and in profiling. It recognizes which of your devices link through use of technology that includes cookies and your IP address. Visit the [Google Analytics Privacy website](#) for more information on cross-device tracking and/or to unlink your devices. Install a Google Analytics Opt-Out Browser Add-On by clicking on this link: <https://tools.google.com/dlpage/gaoptout>
- **Third-party plugins:** Third-party plugins are add-ons that provide additional feature(s) to an existing software program. Plugins may collect information (e.g., the pages visited), and share it with the company that created the plugin even when the user does not interact with it. Sterling Capital uses plugins for a number of purposes, including assisting with accessibility and social media (e.g., the LinkedIn “Follow” button). Third party plug-ins are governed by the privacy policies of the companies that created them.
- **Cloudflare:** We use third-party analytics and marketing technologies to understand how visitors interact with our website and to measure the effectiveness of our campaigns. These technologies are deployed using Cloudflare’s Zaraz tag management service, which allows certain analytics and marketing tools to operate without directly loading third-party scripts in the user’s browser. Through this service, limited information such as device data, browser interactions, page views, and marketing attribution information may be collected. Cloudflare does not host our website content, proxy website traffic, or process sensitive personal information through this service. Analytics and marketing providers used may include Google Analytics, Adobe Marketo Measure (Bizable), and advertising platforms such as Google Ads and social media networks. These technologies are not used on pages that collect sensitive personal or protected information.

Interacting with Sterling Capital Online

Online advertising on Sterling Capital's website

Sterling Capital advertises its products and services on pages within our site. To make the content and advertising as informative and useful as possible, Sterling may target and personalize content and advertisements for products and services on our site.

Online advertising on third-party websites

Sterling Capital advertises its products and services on websites and applications not affiliated with Sterling Capital. The third-party companies we hire to display these ads use their own tracking technologies to measure the effectiveness of these ads and to understand your interests. Many of our third-party partners have their own privacy policies. We encourage you to review these policies carefully. Some of our third-party advertising is interest-based and may use information about your online interests to customize the online ads you see.

Visiting the Sterling Capital Website from Outside the United States

Our sites are intended only for U.S. residents, and we do not knowingly collect personal data or information via our websites of residents of other jurisdictions.

Retention Period

We store your personal information for as long as it is required to meet our contractual, legal, and/or regulatory requirements, or if we have a legitimate business need to do so.

Third Party Links

SterlingCapital.com may contain links to other websites that may be helpful to our users. Sterling Capital provides these links for convenience and is not responsible for the content or privacy practices of these external sites. We encourage users to review the privacy policies of these sites before using them.

Security

To protect personal information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third-party service providers to help protect the confidentiality and security of information.

Social Media

Sterling Capital maintains a social media page on LinkedIn. SterlingCapital.com contains a direct link to the Sterling Capital LinkedIn page, which is used to share timely and relevant information about economic markets, products and services offered by Sterling Capital and for advertising. Please note that any content posted on any social media site is subject to the terms of use and privacy policies of those platforms. Please refer to each individual social media platform for more information on their privacy policies.

Email

Email transmitted across the internet is not normally protected and may be intercepted and viewed by others. You should refrain from sending confidential or private information via unsecured email to Sterling Capital. We encourage clients to request secure and confidential email communications from Sterling Capital. We may retain the content of your emails or our replies to confirm proper responses to your questions/requests and to comply with legal and regulatory requirements.

Protecting your Children

Sterling Capital does not knowingly collect, maintain or use personally identifiable information from children under the age of thirteen. We are not responsible for the data collection and use practices of nonaffiliated third

parties that are linked from our websites. Your child's online privacy is protected by the Children's Online Privacy Protection Act (COPPA). Visit the Federal Trade Commission's [COPPA Website](#) for more information.

Online Privacy Practices Updates

Sterling Capital's Online Privacy Practices are subject to change at any time. Any changes will become effective when posted on the Sterling Capital website. Please review the Online Privacy Practices on the Sterling Capital website periodically. If we revise them in a material way, we will provide a conspicuous notice on our website when any changes take effect.

Response to Automated Signals Requesting Not to Track

At this time, we do not currently respond to browser "do not track" signals or other mechanisms that allow you to tell websites you do not want to have online activities tracked.

Consent

By using SterlingCapital.com, you consent to the collection, use and storage of your personal and non-personal information as described in this policy.

Contact Us

If you have any questions or comments regarding Sterling Capital's Online Privacy Practices, please call 877-835-4836 to leave a message and a Sterling Capital representative will return your call.

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