

# **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 is a subsidiary of Truist Financial Corporation (“Truist”), this policy does not apply to any other Truist websites or any websites of other Truist 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, USA.

## **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.

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.

## **What Information Do We Collect?**

- Your browser type (e.g., Google Chrome, Microsoft Edge, Apple Safari, Mozilla Firefox)
- Your Internet Protocol or “IP” address (a number that is automatically assigned to your device by your Internet Service Provider; an IP address is identified and logged automatically whenever you visit a website, along with the time of the visit and the pages that were visited)
- 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 our website, including:
  - Name
  - Email Address
  - Telephone Number
  - Company
  - Title
  - Location
  - Usernames
  - Passwords
  - Investment professional identification (yes or no)
  - Client status (current client or not)
- 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 and pages on the site
- Ensure that suitable content is provided to each user
- Fulfill regulatory requirements

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 disclose your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber status and device details, if available, to our third-party service provider, solely to verify your identity and prevent fraud for the duration of the business relationship. See the [Sterling Capital Privacy Policy](#) for how we treat your data.

### **How Do We Share the Information We Collect?**

Please see the [Sterling Capital Privacy Policy](#) 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 Policy](#) 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](#)

### **What Technologies Do We Use?**

**Cookies:** Cookies are pieces of information stored directly on your electronic device that provide information used for security purposes, facilitating navigation, displaying information effectively and personalizing your user experience with the Sterling Capital website. Cookies can only be read by the web server that sent the cookie to your device and they cannot be used to retrieve any personal information stored on your device. Cookies do not contain viruses. To browse anonymously, you have the option of setting your device or browser to disable or delete cookies. Please note that disabling or deleting cookies for some websites may impact your ability to use or view those websites.

**Password Encryption:** Password encryption allows Sterling Capital to translate your personal login information on the Sterling Capital website into a secure code. Encryption is the most effective and widely-used way to ensure your login information is secure.

### **Interacting with Sterling Capital Online**

#### **Visiting the Sterling Capital Website from Outside the United States**

If you are visiting the Sterling Capital website, please be aware that your personal information may be transferred to, or stored and processed in, the United States. We will rely on legally-provided mechanisms (e.g., derogations such as performance of a contract) to lawfully transfer personal data across borders.

#### **Retention Period**

We store your personal information as long as it is required to meet our contractual and legal obligations, 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 ensure information remains confidential and secure.

## **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, as well as products and services offered by Sterling Capital. 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. To ensure secure communications, we encourage clients to contact Sterling Capital to request secure email communication. Sterling Capital 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 or retain personally identifiable information from consumers 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). Learn more about COPPA on the [Federal Trade Commission's website](#).

## **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.

## **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 representative will return your call.

**Last Updated May 2021**