Sterling Capital Funds Online Privacy Policy

We at Sterling Capital Funds (collectively "the Funds" or "We," "Us," or "Our"), have created this Privacy Policy to explain how we collect, use and share information we obtain through our website located at www.sterlingcapitalfunds.com (the "Site"), as well as Internet services that we offer (together, the "Internet Services"). Information about you that we collect or that you submit may be transferred to, processed in, and held in countries (including the United States) other than the one in which you reside. By using the Internet Services, you consent to such use of your information and agree to the terms of this Privacy Policy. This Privacy Policy was updated as of February 1, 2020, and as described below, may be updated from time to time.

Some regulators such as the Securities and Exchange Commission and the Federal Trade Commission have adopted rules that require financial institutions, like the Funds, to provide privacy policy notices to their clients. Additionally, this Privacy Policy does not apply to our employees, contractors, applicants for employment or business contacts.

1. Information We Automatically Collect, Including Through Use of Cookies

We automatically collect certain information to help us understand how you use the Internet Services. For example, each time you visit the Site we may automatically collect certain identifiers and internet or other network activity information, such as your IP address, browser and computer type, access time, the webpage from which you came, and the webpage(s) that you access during your visit.

We also may use cookies (which are small amounts of data sent from a web server to your browser that are stored on your computer's hard drive) to keep track of your use of the Internet Services, to validate your identity, to remember your password and preferences, to tailor the Internet Services to your account and to meet your interests, and to improve the quality of the Internet Services. Generally, you can set your browser not to accept cookies or to notify you if you are sent a cookie, giving you the opportunity to choose whether or not to accept the cookie. Please note that if you do set your browser not to accept cookies, certain Internet Services may not function properly.

We use the information described in this section to provide and improve our Internet Services; ensure the security of our assets, systems and networks; prevent, detect and investigate fraud, unlawful or criminal activities in relation to our Internet Services; enforce our Terms of Use; where required by applicable laws and regulations; and where the processing is necessary for the establishment, exercise or defense of legal claims.

Some web browsers may have "do not track" settings. The Site does not honor "do not track" settings.

We do not knowingly collect information from minors nor do we target the Site to minors.

2. Our Information Sharing Practices

Except as otherwise described in this section, we will not share your information with any third party without your permission. We may share your information for a business purposes as described below:

<u>Third-Party Service Providers</u>. We employ other companies and individuals to perform functions on our behalf, such as for analyzing data and providing certain of the Internet Services. These third-party service providers have access to personal information needed to perform their functions, but we require that they not use personal information for other purposes. Personal information is not shared with any unaffiliated third-parties for their marketing purposes.

<u>Other Disclosure Scenarios</u>. Notwithstanding anything in this Privacy Policy to the contrary, we reserve the right, and you hereby expressly authorize us to, share your information: (1) in response to subpoenas, court orders, regulatory requests or legal process, or to establish, protect or exercise our legal rights and interests or defend against legal claims; (2) if we believe it is necessary in order to investigate, prevent or take action regarding inappropriate or illegal activities, fraud, or situations involving potential threats to the safety of any person or property; (3) if we believe it is necessary to investigate, prevent, or take action regarding abuse of the Site's infrastructure or the Internet in general (such as voluminous spamming, denial of service attacks, or attempts to compromise the security of information); (4) to our parent company, subsidiaries, joint ventures, or other companies under common control with us (in which case we will require such entities to honor this Privacy Policy); (5) as part of a corporate transaction with a successor or affiliate or in connected with any acquisition, merger or sale of assets; or (6) with third parties who provide services to us; provided, however, that in those circumstances we request that our service providers not share your User Information in a manner inconsistent with this Privacy Policy.

We do not sell User Information, and have not sold any User Information over the last 12 months.

3. Your Rights

Individuals in Andorra, Argentina, Australia, California, Canada, Europe, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, the United Kingdom, Uruguay, and certain other jurisdictions may have certain data subject rights. These rights vary, but they may include the right to: (i) request access to and rectification or erasure of their personal information; (ii) restrict or object to the processing of their personal information; and (iii) obtain a copy of their personal information in a portable format. Individuals may also have the right to lodge a complaint about the processing of personal information with a data protection authority. If you wish to exercise any of these rights, please call 1-800-228-1872 or mail us at Sterling Capital Funds, P.O. Box 9762, Providence, RI 02940-9762.

The California Consumer Privacy Act ("CCPA") prohibits covered businesses from discriminating against you for exercising applicable CCPA rights.

If you wish to exercise your rights, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the individual whose personal information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying with the request. For requests related to particularly sensitive information, we may require additional proof of identification. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.

Additionally, under California Civil law, Californians are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties' direct marketing purposes. Californians who wish to request further information about our compliance with this statute or who have questions, more generally, about our Privacy Policy and our privacy commitments and our Site should contact us by phone at 1-800-228-1872 or mail us at Sterling Capital Funds, P.O. Box 9762, Providence, RI 02940-9762.

4. Security

We have implemented measures to help protect your User Information from loss, misuse or unauthorized access or disclosure. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your User Information, we cannot guarantee its security.

5. Links

The Site may contain links to other websites. We are not responsible for the privacy practices of any such other website (whether accessed through an advertisement, service or content link) and urge you to review such practices prior to submitting any information to such websites.

6. Changes

We may change or update portions of this Privacy Policy at any time without notice to you. Please check back from time to time so you are aware of any changes or updates to the Privacy Policy.

7. Questions

If you have any questions about this Privacy Policy, please feel free to contact us by phone at 1-800-228-1872 or mail us at Sterling Capital Funds, P.O. Box 9762, Providence, RI 02940-9762.