



CALIFORNIA CONSUMER PRIVACY NOTICE

Maintaining the privacy and security of your personal information is Sterling Capital Management LLC's¹ ("Sterling") highest priority. In doing so, we want to provide transparency regarding how and why your data is collected, how it is used, and with whom it may be shared. This document, as well as Sterling's Consumer Privacy Notice and Statement of Online Privacy Practices, both found here <https://sterlingcapital.com/about-us/privacy-notice/>, set forth how we will interact with your personal information. Specifically, it provides information on how you may exercise your California privacy rights. This Notice is directed to consumers who reside in the state of California and relates to collection, use, and disclosure of personal information covered by the California Consumer Privacy Act (CCPA). That said, all of our clients are welcome to submit questions or requests about their data.

It is important to note that Sterling does not sell your personal information. Because such sales do not occur there is no link on our website to opt-out of such activity.

To help ensure transparency around our handling of consumer personal information, we offer a portal with our partner, OneTrust, to facilitate receiving and processing requests related to accessing and potentially deleting your information. This portal helps us meet certain legal and compliance requirements such as those under the CCPA. It also provides non-California consumers a vehicle to make similar requests.

CCPA PRIVACY NOTICE

Sterling's Consumer Privacy Notice and Statement of Online Privacy Practices provides consumers details about our practices concerning the privacy of personal information. This Notice provides further information about our practices, along with details concerning how "Consumer Access" ("Right to Know") and/or "Right to Request Deletion" requests may be submitted. This Notice is designed to provide additional information to California residents pursuant to CCPA. The following are some general notes about Sterling's practices related to the collection, use and sharing of personal information:

It is necessary for us to collect certain personal information in order to provide our products and services, fulfill consumer requests, to comply with the federal and state laws, and other legal obligations. Below is a list of categories of personal information we may have collected in the past 12 months:

- Personal identifiers (e.g. name, contact information)
- Demographic/Protected class information (e.g. marital status, sex)
- Government Issued data (e.g. passport, driver's license, Social Security number)

¹ Sterling Capital Management LLC is a subsidiary of Truist Financial Corporation.

- Financial related data (e.g. account number, account dates and balances, financial transactions)
- Commercial information (e.g. purchase histories, transaction information)
- Professional or employment-related information
- Education information
- Geolocation (e.g. your IP address when visiting Sterling's website)
- Internet or other electronic network activity information (e.g. browsing history)
- Audio, electronic, visual, thermal or olfactory information (e.g. voice recordings when you leave a voicemail for a Sterling teammate)
- Marketing opt-out/preference information
- Inferences drawn from any of the above information

It is necessary for Sterling to share certain personal information with affiliates and/or trusted service providers in order to provide our products and services, and to comply with legal, regulatory, and contractual obligations. We may disclose each of the categories of personal information described above to such external or affiliated companies. When engaging service providers, Sterling ensures that such partners will maintain the information in accordance with our privacy and security standards, and only use the data for the use(s) specified in the contract. Below are categories of third parties with whom we share personal information:

- Affiliates and other entities in the Sterling & Truist family
- 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, such as when you use a third party service to help manage your financial information across financial institutions
- 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 or acquisition, sale, bankruptcy, or other disposition of some or all of our assets
 - To exercise or defend legal claims

Purpose for Collection and Use

We collect and use personal information in order to conduct business, manage relationships and accounts, and maintain operational functions at Sterling. In the past 12 months, we have collected and used personal information for the following purposes:

- Deliver, manage and support products and services (e.g. account information, statements, notifications)
- Manage business operations
- Assess and manage risk, manage internal financials
- Meet legal, regulatory, or compliance requirements
- Manage fraud and financial crimes
- Support and optimize channels and interactions (e.g. improving website)

- performance)
- Identify and recommend new products and services
- Perform services on behalf of another entity or business
- Provide employee benefits and other services, manage hiring, employment, performance, and staffing

Sources of Personal Information

Sterling collects information from various sources in the course of providing products and services to you, and the sources will vary based on the relationship and products or services we provide to a client or consumer. Below is a list of the categories of sources from which we obtain data:

- Directly from you or your guardians/representatives
- Outside service providers, vendors, and third parties from which we collect personal information or market data as part of providing products and services, completing transactions, or supporting operations
- Outputs from analytics
- Websites, mobile applications, and social media
- Our affiliates or subsidiaries
- Public records or publicly available data

No Sale Policy

As noted above, 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 no opt-out for the sale of data provided on our website, since there is no activity to opt out from.

Consumer Access Requests

Consumers may exercise their “Right to Know” under the CCPA to request that Sterling disclose categories of information or specific pieces of information we may have collected about them 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, and the categories of third parties with whom we share personal information.

Consumers are welcome to submit requests for more information by visiting our Consumer Rights Request Portal, hosted by OneTrust:

- To submit a data access request for yourself, [click here](#)
- To submit a data access request on behalf of another individual, [click here](#)
- To dispute or appeal a prior data access request, [click here](#)

Consumers are also welcome to submit requests by calling 1-877-835-4836.

All requests must be verified prior to receiving a response, using Sterling authentication protocols. Requesters will be asked to supply certain basic Personal Information to enable us to validate the requestor is the consumer who is subject to the request, 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 authorization form, Guardianship Order or other court order granting authority to receive information, as appropriate.

Upon submission of a request, California consumers will receive an initial response confirming receipt within 10 (ten) days. A full response will be provided to California consumers 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).

Please note that Sterling adheres to an exemption within the CCPA for data collected pursuant to the Gramm-Leach-Bliley Act (GLBA). This enables us to best protect the security of our clients and consumers when responding to requests. Data provided pursuant to GLBA is often highly sensitive Personal Information, including financial data, that could lead to identity theft should it land in the wrong hands. We will continue to provide access to sensitive financial data only through our established, secure mechanisms to obtain that information. Therefore, specific pieces of data collected pursuant to GLBA will not be provided through a Consumer Rights Access Request Portal.

“Right To Request Deletion” Requests

Consumers also have a right under the CCPA to request deletion of their personal information collected or maintained by Sterling.

The submission methods, authentication protocols, and time frames for response are identical to those referenced above in the “Consumer Access Requests” section. Keep in mind that the GLBA exemption and other legal exemptions may also apply to these requests. For example, Sterling cannot delete data provided by a client to service an active (or recently active) account, because such data is still needed to provide the product or service and/or meet legal or regulatory retention requirements. Another example would be the inability to delete certain data that is subject to a legal hold.

Sterling will explain in its response the manner in which it has deleted the personal information. Or, if an exemption applies restricting Sterling's ability to delete the data, Sterling will describe the basis for the denial of the request in its response. Should an exemption apply precluding the destruction of the data, Sterling will not use the consumer's personal information for any other purpose than provided for by that exemption (for example, if certain data cannot be deleted due to a legal hold, we will ensure that such data is no longer used for Sterling's marketing purposes).

Non-Discrimination

The submission of a “Right to Know” or “Right to Request Deletion” request will have no impact on the service and/or pricing you receive from Sterling. It will not result in any denial of goods or services, or different prices, rates or quality of goods or services.

Updates

This Consumer Rights and CCPA Notice may be revised from time to time, so please review this notice periodically. Any changes will become effective when we post the revised notice on the site (please note the effective date listed at the bottom of this notice). If we revise this or other privacy notices in a manner that materially changes our privacy practices, we will provide conspicuous notice on our website and provide direct notice to our clients.

Contact Us

If you have any questions or comments on this notice or our privacy practices generally, please contact us at 1-877-835-4836.

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