

# FACTS

## WHAT DOES STERLING BANK & TRUST, FSB 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Credit history and credit scores

When you are *no longer* our customer, we continue to share your information as described in this notice.

### 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 Bank & Trust, FSB chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sterling Bank & Trust, FSB share?	Can you limit this sharing?
<b>For our everyday business purposes--</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes--</b> to offer our products and services to you	No	We don't share
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes--</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes--</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

### Questions?

Call toll-free (800)944-2265 or go to <https://www.sterlingbank.com/privacy.html>

## Who we are

### Who is providing this notice?

Sterling Bank & Trust, FSB, and its division SBT Advantage Bank.

## What we do

### How does Sterling Bank & Trust, FSB 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.

### How does Sterling Bank & Trust, FSB collect my personal information?

We collect your personal information, for example, when you

- Open an account or deposit money
- Pay your bills or apply for a loan
- Use your credit or debit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

### Why can't I limit all sharing?

Federal law gives you the right to limit only

- 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

State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]

## Definitions

### Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Sterling Bank & Trust, FSB does not share with our affiliates.*

### Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Sterling Bank & Trust, FSB does not share with nonaffiliates so they can market to you.*

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Sterling Bank & Trust, FSB doesn't jointly market.*

## Other important information

### Special Notice For California Residents

#### CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY

Under the California Consumer Privacy Act (CCPA), California residents are provided with specific rights regarding the personal information that is collected, used, disclosed, or sold about them.

#### Other Privacy Statement

**Right to Know About Personal Information Collected.** You have the right to request that we disclose the personal information we collect and use about you.



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## CALIFORNIA CONSUMER PRIVACY ACT PRIVACY POLICY

We are required to provide California residents with a comprehensive description of our online and offline privacy policy and practices regarding the collection, use, and retention of your personal information (our "Information Practices"); to inform you of your rights regarding your personal information; and to provide you with any information necessary for you to exercise those rights.

### *Your Rights Regarding Your Personal Information*

- (1) **Right to Know.** You have the right to know the personal information that we collect and use about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting personal information; and the specific pieces of personal information that we have collected about you.
- (2) **Right to Delete.** You have the right to request us to delete any personal information that we have collected about you. Subject to certain exceptions, we will delete the personal information that we have collected about you from our records, and we will direct any service provider or contractor to delete your personal information from their records.
- (3) **Right to Correct.** You have the right to request us to correct any inaccurate personal information that we maintain about you. Subject to certain exceptions, we will correct the personal information that we maintain about you on our existing system, and we will direct any service provider or contractor to make the necessary corrections on their systems.
- (4) **Right to Not Receive Discriminatory Treatment.** You have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the California Consumer Privacy Act ("CCPA"). A price or service difference is discriminatory and prohibited if we treat you differently because you exercised a right conferred by the CCPA or its issuing regulations. A price or service difference is non-discriminatory if it is reasonably related to the value of your data.

### *Types of Personal Information*

#### Collected Personal Information

**Categories of Personal Information.** We collected the following categories of personal information in the preceding 12 months:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- Characteristics of protected classifications under California or federal law
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Biometric Information
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Professional or Employment-Related Information
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act



- Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

**Categories of Sources.** We collected your personal information from the following type of people or entities:

- Direct from the consumer
- Advertising networks
- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks

**Business or Commercial Purposes.** We collected your personal information for these business or commercial purposes:

- Performing services on behalf of the institution, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the institution

**Personal Information Is Not Sold or Shared.** We have not sold or shared your personal information to any third parties in the preceding 12 months.

**Personal Information Is Not Disclosed.** We have not disclosed your personal information to third parties in the preceding 12 months.

### ***How to Submit A Request Regarding Your Personal Information***

You can submit to us a verifiable request to know, request to delete, or request to collect your personal information. We will verify that you are the person who we have collected information about by using the personal information provided in the verifiable consumer request. If you wish to submit a verifiable request for personal information we collect, use, or disclose or a request to delete information you should:

1. Contact us at our toll free number 800-944-2265
2. Visit our website at [www.sterlingbank.com](http://www.sterlingbank.com)

. No later than 10 business days after receiving your request(s), we will confirm that we received your request(s) and provide you with information on how we will process your request(s). We will respond to your request to know, request to delete, or correct no later than 45 calendar days after receiving your request(s). If we cannot verify your identity within this time period, we may deny your request(s). If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 calendar days. Our response will cover the 12-month period preceding our receipt of your request.

You can submit your request to know delete, request to delete, and request to correct by calling us toll-free at 1-800-944-2265. You can also submit your request(s) by using any of the following methods:

- Visiting our online form at: [www.sterlingbank.com](http://www.sterlingbank.com)
- Toll Free Phone Number: 800-944-2265

**Authorized Agents.** We may allow an authorized agent to make a request to know, request to delete, or request to correct on your behalf. We may require written proof that you have given the agent permission to submit a request on your behalf, require the agent to verify their identity with us, or require you to confirm with us that you have provided the agent permission to submit the request. If you are an authorized agent, you may make these requests by following these instructions: Your authorized agent may also make a request on your behalf. When submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

Sterling Bank and Trust, FSB will not discriminate against you when you exercise a privacy right under CCPA.

### ***Contact Information***



For more information about our privacy policy and practices regarding our Information Practices, you can contact us by **Request to Know**. You may submit a verifiable request to know the personal information we collected, used, disclosed, or sold by calling us toll-free at 1-800-944-2265. You may also submit your request to know by using any of the following methods:

- Visiting our online form at [www.sterlingbank.com](http://www.sterlingbank.com)

**Request to Delete.** You may submit a verifiable request to delete the personal information we collected by:

- Calling us toll-free at: 1-800-944-2265
- Visiting our online form at [www.sterlingbank.com](http://www.sterlingbank.com)