



## Privacy Policy March 2021

Stern Brothers & Co is committed to protecting your privacy and maintaining the security of your nonpublic personal information. This Privacy Policy sets forth the manner in which Stern may collect, utilize and maintain nonpublic information about clients, as required under federal and other applicable law. Stern is committed to protecting privacy and maintaining the confidentiality and security of clients' personal information.

### Collection of Information

Stern may collect personal information about clients from the following sources:

- Client questionnaires and other information provided by the client in writing, in person, by telephone, electronically or by any other means. This information may include name, address, employment information, financial and investment qualifications as applicable;
- Information about clients from financial institutions and service providers with whom a client may have authorized to provide such information to Stern; and
- Verification services and consumer reporting agencies, including clients' creditworthiness or credit history, as applicable.

### Disclosure of Nonpublic Personal Information

Stern does not disclose nonpublic personal information about clients or potential clients to affiliates or nonaffiliated third parties except as permitted by law. For example, Stern may share nonpublic personal information about clients, without the client's consent, with affiliated and nonaffiliated parties in the following situations, among others:

- in connection with the administration and operations of Stern and the offer of its products and services, with Stern's brokers, attorneys, accountants, auditors, administrators or other service providers;
- to respond to a subpoena or court order, judicial process or regulatory inquiry;
- in connection with a proposed or actual sale, merger or transfer of all or a portion of its business;
- to protect or defend against fraud, unauthorized transactions (such as money laundering), lawsuits, claims or other liabilities;
- to respond to requests for information regarding compliance with anti-money laundering laws, anti-terrorist due diligence or other federally mandated reporting requirements;
- upon consent of a client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the client; and
- to assist Stern in offering affiliated products and services to clients.

To further your personal right to privacy you have these additional rights:

- the right to know what personal information is being collected about you;
- the right to know whether your personal information is sold or disclosed and to whom;
- the right to stop the sale of personal information;
- the right to have collected personal information deleted; and
- the right not to be discriminated against for exercising your rights.

To the extent permitted by law, you have the right to opt-out of our disclosing nonpublic personal information to nonaffiliated third parties by contacting us at [info@sternbrothers.com](mailto:info@sternbrothers.com) or 800-466-5519. We will without charge comply with your request within 45 days or sooner and not later than 90 days when due to the complexity of the request.

**Former and Prospective Clients:** This same Privacy Policy applies to former and prospective clients.

### Protection of Subscriber Information

Stern maintains physical, electronic and procedural safeguards that comply with federal standards to protect client information. Stern restricts access to the personal information of clients to those staff members who need to know that information in the course of their job responsibilities in order to provide Stern's services. When disposing of records containing client information our staff members are trained to use an electronic shredder or destruction locked box.

### Further Information

Stern reserves the right to change its Privacy Policy at any time. The examples contained within this Privacy Policy are illustrations and are not intended to be exclusive. This Privacy Policy complies with federal law regarding privacy issues. Clients may have additional rights under other domestic or foreign laws as applicable. If you have any questions about this Privacy Policy, please call us at 314-727-5519. (Revised March 2021)