

# FACTS

## What does Sterling Investment Counsel, LLC (“Sterling”) 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, date of birth, employment information and sources of income
- Banking information and wire transfer instructions
- Assets, income, account balances and transaction history

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

### How?

All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients’ personal information; the reasons Sterling chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sterling 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	Yes	No
<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	Yes	No
<b>For our affiliates’ everyday business purposes</b> information about your creditworthiness	No	We don't share
<b>For non-affiliates to market to you</b>	No	We don't share

### Questions?

Call (716) 783-7054 or go to [www.sterinv.com](http://www.sterinv.com)

## Who we are

Who is providing this notice?

Sterling Investment Counsel, LLC

## What we do

**How does Sterling Investment Counsel 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.

Sterling limits access to personal information to individuals who are required to have that information in order to service your account.

**How does Sterling Investment Counsel collect my personal information?**

We collect your personal information, for example, when you

- Open an account and give us your contact information
- Seek investment advice and provide account information
- Tell us about your investment portfolio

We also collect your information from other sources, including 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 non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

## Definitions

**Affiliates**

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

- Sterling has one affiliate, Jensen, Marks, Langer & Vance, LLC

**Non-affiliates**

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

- Sterling does not share with non-affiliates so they can market to you. Sterling may share personal information with non-affiliates to process transactions and other everyday business purposes.

**Joint marketing**

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- Sterling does not jointly market with non-affiliated financial companies

## Other important information