

**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?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	No	We don't share
For non-affiliates to market to you	No	We don't share

**Questions?**

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