

STERLING FINANCIAL PLANNING, INC.
PRIVACY POLICY

Pursuant to applicable federal and/or state privacy regulations Sterling Financial Planning, Inc. (referred to as “Sterling”) is a financial institution that has determined to keep confidential nonpublic personal information about each Sterling client.

Nonpublic personal information is defined to mean personally identifiable financial information that is provided by a consumer to a financial institution, results from any transaction with the consumer or any service performed for the consumer, or is otherwise obtained by the financial institution.

Personally identifiable financial information means any information: (1) a consumer provides to a financial institution to obtain a financial product or service; (2) about a consumer resulting from any transaction involving a financial product or service between a financial institution and a consumer; or (3) a financial institution otherwise obtains about a consumer in connection with providing a financial product or service to that consumer.

Attached hereto and made a part hereof is a copy of Sterling’s *Privacy Notice* that is to be distributed by Sterling: (1) initially: (a) to each existing Sterling client; and (b) to each new client prior to or at the time of establishing a “customer relationship” with Sterling; and (2) annually thereafter for as long as the client maintains its relationship with Sterling.

The purpose of Sterling’s *Privacy Notice, Privacy Policy* as well as its underlying procedures is to protect the confidentiality and security of its clients’ *nonpublic personal information*. The categories of nonpublic personal information that Sterling collects from a client depend upon the scope of the client engagement. It may include information about the client’s personal finances, information about the client’s health to the extent that it is needed for the planning process, information about transactions between the client and third parties, and information from consumer reporting agencies. Sterling has instituted certain technical, administrative and physical safeguards through which Sterling seeks to protect this *nonpublic personal information* about current and former clients from unauthorized use and access. First, technical procedures are used in order to limit the accessibility and exposure of client information contained in electronic form. Second, administrative procedures are used in order to control the number and type of employees, affiliated and nonaffiliated persons, to whom customer information is accessible. Third, physical safeguards have been established to prevent access to client information contained in hard-copy form. As illustrated above, Sterling realizes the importance of information confidentiality and security, and emphasizes practices which are aimed at achieving those goals.