

STERLING MERCHANT GROUP

PRIVACY POLICY

Last updated: June 7th, 2017

The ***Sterling Merchant Group*** and its subsidiaries ("***Sterling***", "we" or "us") welcome you to our website and appreciate your interest in our services and products.

Sterling attaches great importance to appropriate data protection. This page explains how we treat your personal data in connection with your use of our website ("privacy policy").

By continuing to use the ***Sterling*** website, you confirm that you are 18 years of age or older and expressly agree with this privacy policy.

Please note that we may amend this privacy policy from time to time. The applicable version is always the current one, as referenced above (last updated).

PURPOSE AND SCOPE OF THE PRIVACY POLICY

Protecting your privacy and treating the personal data of all current, former and future clients in accordance with the law is very important to us. We understand that by visiting and using our website you may be entrusting us with personal information ("data") and assure you that we take our duty to protect and safeguard this data very seriously. This privacy policy therefore explains the kind of data we collect, the purpose for which we collect it, how we process it, whom we may disclose it to and the security measures we have put in place to protect it.

This privacy policy applies to all data we obtain through your use of our website. It does not apply to third-party websites, even if you access them via a link on the Sterling website. We have no influence on the content or privacy policy of any third-party websites and therefore cannot assume any responsibility for them.

TYPE AND PURPOSE OF DATA COLLECTION

When you use our website, details of your usage are automatically registered by our web server (such as your IP address, browser, the content you accessed, including time and date of access, and the website from which you came to our website). We also collect and store information such as your name, address, e-mail address, phone number, date of birth, gender and other data transmitted to us if you complete a registration form or comment field for the newsletter, product demos, etc.

We collect this data for the following primary purposes:

- To comply with national and international legal and supervisory provisions as well as the bank's own internal guidelines
- To check the identity and suitability of clients for certain products and services
- To establish a basis for future information on the services and products offered by Sterling and to improve their quality
- To facilitate technical administration, research and further development in connection with the Sterling website
- To use it for marketing and advertising measures (e.g. newsletters via e-mail, online advertising)
- To analyse user behaviour and navigation while on the website
- To facilitate client administration

We store all your personal data in accordance with the applicable laws on data protection and for as long as required.

DISCLOSURE OF WEBSITE USAGE DATA

Sterling only discloses website usage data to third parties as permitted by law, and in particular only if they have agreed to abide by this privacy policy, if we are legally obliged to do so or if such disclosure becomes necessary to enforce our rights, in particular to enforce claims arising from a contractual relationship. Within the scope of the above purposes as well as for the purpose of optimising our services, we may transmit data within the **Sterling** Group of companies. Furthermore, we may disclose data to external service providers if this is necessary for the performance of a contract. Such service providers may not use the data for any other purpose than to process the order in question. All of the above persons and entities that may receive data must observe the applicable national and international data protection laws as well as the data protection standards of **Sterling**.

Where so prescribed by applicable legislation, ***Sterling*** may on request or under an ongoing duty to provide information disclose data to supervisory authorities, judicial authorities or other persons of authority.

SECURITY MEASURES

Sterling takes appropriate technical and organisational security measures to ensure that personal data collected and stored in connection with your visit to our website is protected against unauthorised access, misuse, loss and/or destruction.

Sterling takes both physical and electronic process-specific security measures, including firewalls, personal passwords, and encryption and authentication technologies. Our employees and the service providers commissioned by us are bound by professional secrecy and must comply with all data protection provisions.

Additionally, access to personal data is restricted to only those employees, contractors and third parties who require this access in order to assure the purpose of data processing and the provision of services and products (need to know principle).

COOKIES

The ***Sterling*** website uses cookies for statistical purposes as a tool for our web developers and to improve the user experience. Cookies are small files that are placed on your computer via your web browser when you visit the ***Sterling*** website. These files store information on your preferences when using our website, which they transmit to our server (e.g. language preferences or other preference settings). This allows you to find your way around the website more quickly and use it more efficiently the next time you visit it.

We use cookies to, for example,

- record user preferences regarding screen layout, including the preferred language and country;
- monitor the number and type of visits to the website, so as to be able to determine which parts of the website work well and which need to be improved;
- gather statistical data on the number of users and their user behaviour in order to optimise the website's speed and performance.

Please note that most web browsers accept cookies automatically. You can configure your browser to not save any or only certain cookies on your computer or to always display a warning before receiving a new cookie. Deactivating cookies can, however, prevent you from using certain functions on our portal.

LINKS

The ***Sterling*** website may contain links to the websites of other companies ("third-party websites") that are not operated or monitored by us. Please be aware that such third-party websites are not bound by this privacy policy and that we are not responsible for their content or their principles regarding the handling of personal data. We therefore recommend consulting and checking the individual privacy policies of third-party websites.

WEB ANALYSIS TOOLS

We use bank-internal web analysis tools for the purpose of website reporting within Marketing. This involves the creation of pseudo-anonymised data and use of small text files stored on your computer (so-called cookies). The information about your use of our website generated by these cookies, such as the

- host name of the accessing computer (IP address)
- type/version of browser used
- operating system
- referrer URL (website from which visitors are redirected to the ***Sterling*** website by clicking a link)
- date and time of server request,

is not transmitted to any third-party servers. It is used exclusively for bank-internal web analysis purposes.

Please refer to the previous section, "Cookies", for information on deleting cookies.

TRANSMISSION OF DATA VIA THE INTERNET

Sterling would like to draw your attention to the fact that data transmitted via an open network like the Internet cannot be fully protected from third-party access. This may result in such data being disclosed or altered in content, or lead to technical errors in its transmission. In particular, data sent via the Internet (e.g. via a contact form on the website or an e-mail service) may leave the country – even where both sender and recipient are in the same country – and may be transmitted to and potentially stored in a third-party country in which data protection requirements may be laxer than in your country of residence.

Where data is transmitted to ***Sterling*** via the Internet, we cannot be held responsible for the protection of this data. We recommend avoiding the transmission of any strictly confidential information via open networks.

QUESTIONS / CONTACT

You can contact us to find out whether we have stored any personal data about you, to request a copy or list of any such data or to correct any erroneous data about yourself. You can also request that your personal data is deleted, provided this is not prohibited under any legal or regulatory provisions (e.g. legal duty of safe-keeping of business-related information). Please note that ***Sterling*** shall not be required to delete data made pursuant to automatic archiving and back-up procedures in its IT systems, where a deletion is not possible or not possible without commercially unreasonable efforts, provided the respective data is marked as blocked.

Please note that we can only process requests for information or the amendment, correction and/or deletion of data if such request is made in writing and with proof of your identity. In the case of your data being deleted, we may not or only partly be able to offer you our products and services.

You can submit questions with regard to data processing via the following link:

<http://www.sterlingmerchantgroup.com/contact-form/>

If you have any questions or suggestions with regard to this ***Privacy Policy***, please contact us at info@sterlingmerchantgroup.com/privacypolicy/ and direct your communication to “Customer Care - Privacy Policy Issues”.