

PRIVACY POLICY

Effective Date: June 3, 2024

Last Updated: June 3, 2024

The Privacy Policy describes how Sterling Group Companies and affiliated entities (collectively, “Sterling” “we” and “us”) processes personal information about you. This Privacy Policy applies when you visit or use our websites (“Sites”), contact our customer service team, engage with us on social media, communicate with us on behalf of a vendor or customer, apply to work for us, purchase our products or services, or otherwise interact with us.

This Privacy Policy does not apply to personal information collected in the course of your employment with us. Our Workforce Privacy Notice applies to that personal information. If you are a member of our workforce, please contact Human Resources to obtain a copy of our Workforce Privacy Notice.

If you have any questions, please contact us as provided below. If you would like to receive this Privacy Policy in a different format, please contact us at privacy@sterling.com.

BY USING THE SITE, MAKING A PURCHASE WITH US, OR OTHERWISE PROVIDING US WITH YOUR PERSONAL INFORMATION, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

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Categories of Personal Information We Process

The type of information that we collect depends on your interaction and relationship with us. We may collect the below categories and types of personal information with your consent or as otherwise required or permitted by law.

- **Identifiers.** We may collect name, postal address, telephone number, email address, business contact information, social security number, driver's license number, passport number, tax identification number, signature, online identifiers (Facebook ID, Google ID, LinkedIn ID, Twitter ID, etc.), and username or email address, combined with password or security question and answer.
- **Audio/Visual Data.** We may collect audio, electronic, photographic, visual or similar data including photographs, audio messages, and text messages.
- **Commercial Information.** We may collect records of products or services purchased, obtained, or considered and purchasing histories.
- **Education Information.** If you apply to work with us, we may collect education history.
- **Financial Information.** We may collect bank account number, credit card number, swift/BIC number, and IBAN (International Bank Account Number).
- **Internet or Electronic Usage Data.** We may collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.
- **Geolocation Data.** We collect geolocation data including the general region or area from which you access our Sites.
- **Professional or Employment Information.** If you apply to work with us, we may collect job application details such as your employment history, resume, and references as well as information on any relevant certifications or licenses.
- **Inferences.** We use information from the categories of personal information described above in order to create inferences about you.

Sources of Personal Information

We collect personal information in the following ways:

- **Directly from you.** We may collect identifiers, audio/visual data, commercial information, education information, financial information, and professional or employment information that you provide directly to us. This included when you are interacting with products, services, systems, applications, etc. For example, when you are interacting with a digital person, artificial human, or avatar, or with a system/application for security, authentication, access purposes.
- **Automatically.** When you access our Site, we may collect internet or electronic usage data using tools like browser cookies.
- **From third-parties including vendors and service providers.** We may collect identifiers, commercial information, education information, financial information, internet or electronic usage data, and professional or employment information from third parties including vendors and service providers.
- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect identifiers, commercial information, education information, financial

information, internet or electronic usage data, professional or employment information, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

Purposes for Collecting Personal Information

We use personal information for the following business and commercial purposes:

- **Transactional Purposes.** We use identifiers, financial information, and commercial information to: (i) allow you to purchase and receive products and services that we offer; (ii) communicate with you; (iii) allow you to create an account with us; and (iv) provide you with customer assistance.
- **Recruiting and Hiring.** We use identifiers, audio/visual data, professional or employment information, education information, financial information, and inferences to make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.
- **Analytical Purposes.** We use identifiers, commercial information, internet or electronic usage data, and inferences to analyze preferences, trends, and statistics.
- **Marketing and Promotional Purposes.** We use identifiers, financial information, and internet or electronic usage data to improve our marketing efforts, for prospecting of new customers, for customer relationship management, for customer engagement, to administer sweepstakes, contests, and promotions, and to provide you with information about us, including personalized marketing communications.
- **Combination of Data.** We combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third-party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.
- **Maintenance and Improvement of our Sites and Systems.** We use internet or electronic usage data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems.
- **Develop and Improve our Product and Services.** We use identifiers, audio/visual data, commercial information, financial information, internet or electronic usage data, and inferences to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We use identifiers, audio/visual data, commercial information, financial information, internet or electronic usage data, professional or employment information, and inferences to: (i) protect our Site, premises, assets, systems, products, services and

intellectual property; (ii) protect us, our affiliated companies, our employees, and others from fraud, theft, and other misconduct; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft, and misconduct including by verifying the identity of those we are considering hiring and those we are conducting business with.

- **Legal.** We use identifiers, audio/visual data, commercial information, education information, financial information, internet or electronic usage data, professional or employment information, and inferences to comply with our legal obligations, contractual obligations, and other compliance obligations, including reporting requirements, and defend ourselves against allegations, complaints, claims and in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes.** We may use identifiers, audio/visual data, commercial information, education information, financial information, internet or electronic usage data, professional or employment information, and inferences for other reasons we may describe to you.

How We Disclose Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our products, services, Site, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting providers, lawyers, bankers, tax consultants, auditors, insurers, payment processors, financial institutions, email delivery vendors, internet service providers, operating systems and platforms, recruiting vendors, maintenance and customer support services). In some cases, the vendor or service provider may directly collect the information from you on our behalf.
- **Marketing/Analytics/Advertising Partners.** We may share personal information with third-party marketing, analytics or advertising partners, including social media platforms and networks, who provide analytics or marketing and advertising services to us.
- **Government Entities.** We may share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you products or services, or as long as necessary to comply with our legal obligations, contractual obligations, and other compliance obligations, resolve disputes, and enforce our agreements. We use the following criteria to determine retention periods:

- how long the information is needed to provide our products and services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

Cookies, Analytics, and Other Tracking Technology

Cookies and Tracking Technology

When you access the website, we (and third-party companies we work with) may collect and store certain information by using technologies such as server logs, cookies, web beacons, clear gifs, tags, e-tags, flash cookies, log files, pixels, code, Javascript packages, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. The information collected includes information about your activities on our Sites, IP address, browser or operating system type and version, device IDs, and demographic or inferred-interest information, as well as information or communications you have submitted to us through the Sites.

We use this information to understand general usage and volume statistics, how users navigate to and around our Sites, what content is viewed or accessed, and which products and services have been obtained. We also use these technologies to keep track of your preferences and profile information. We also use these technologies to allow third-parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. For example, our advertising partners may use the fact that you visited our Sites to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices. These third parties partners may use this information for our and their own advertising, analytics, attribution, and reporting purposes. To learn more about interest-based advertising, tracking technologies, and how to opt out, please visit <http://www.aboutads.info/choices>. You can disable the sharing of your personal information for cross-contextual behavioral advertising or targeted advertising through online tracking technology by clicking on the paperclip icon on the right side of our webpage and disabling all cookies that are not strictly necessary.

Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not

currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

Session Replay Technology

We use session replay technology on our Sites. Session replay technology, also referred to as session playback or user experience (UX) replay, collects information regarding, records, and tracks your interactions with a website or application. It then transforms those logged user events (such as mouse movements, clicks, page visits, scrolling, tapping, etc.) into a reproduction of what you actually did on the website or application. We use session replays for quality control, customer service, fraud prevention and security, and marketing purposes. Our session replay technology is owned and operated by a third-party who acts as our service provider. The information collected by this technology may be collected by, transferred to, and stored by our third-party service provider.

Google Analytics

We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Site, please visit www.google.com/policies/privacy/partners. If you would like to opt-out, Google provides a an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

Links to Other Website

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

Third-Party Payment Processors

We use third-party payment processors to assist with processing your payment information. If you pay with a credit card or other form of electronic payment, the payment information that you provide is transmitted directly to the payment processor who will process and store your personal information.

Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use website and share information with caution.

This Website is Not Intended for Children

Our website is not directed to children under the age of 13. We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will remove his or her personal

information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to privacy@sterling.com.

Marketing Communications

Marketing Emails. You can opt out of marketing or advertising emails by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us at privacy@sterling.com. Once we process your request, we will cease using the information for such purposes at no charge to you. If you opt out of getting marketing messages, you will continue to receive messages from us about your relationship with us where permitted by law.

Phone Calls and Text Messages. If you do not want to receive marketing phone calls or text messages from us, please inform us that you no longer want to receive calls from us when you receive a call from us, or reply STOP to a text message from us. You can also opt-out of telemarketing by contacting us at privacy@sterling.com.

Processing in the United States

Please be aware that information we obtain about you will be processed in the United States by or service providers or us. By using the Sites or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

California Privacy Rights

This section applies to residents of California.

Shine The Light. If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at privacy@sterling.com and include "CA Shine the Light" in the subject line of your email.

California Consumer Privacy Act ("CCPA").

Sale or Sharing of Personal Information. In the 12 months preceding the last updated date below, we have "sold" to or "shared" with (as those terms are defined in the CCPA) advertising/marketing/analytics partners the following categories of personal information: identifiers, commercial information, geolocation data, internet or electronic usage data, and inferences. We do not knowingly sell or share the personal information of minors under the age of 16.

Use or Disclosure of Sensitive Personal Information. In the 12 months preceding the last updated date below, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Disclosures for a Business Purpose. In the 12 months preceding the last updated date above, we have disclosed the following categories of personal information to these categories of recipients for a business purpose:

- Identifiers: service providers, marketing/analytics/advertising partners, professional advisors, and government entities.
- Audio/Visual Data: service providers, professional advisors, and government entities.
- Commercial Information: service providers, marketing/analytics/advertising partners, professional advisors, and government entities.
- Education Information: service providers, professional advisors, and government entities.
- Internet or Electronic Usage Data: service providers, marketing/analytics/advertising partners, professional advisors, and government entities.
- Inferences: service providers, marketing/analytics/advertising partners, professional advisors, and government entities.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete your personal information.
- You have the right to opt-out of the sale of your personal information.
- You have the right to opt-out of the sharing of your personal information for cross-context behavioral advertising or targeted advertising.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your rights.

Exercising Your Rights. To exercise any of your rights, please use our [webform](#) or call us toll free at 866-219-2874. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation. In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us.

Cookie-Based Opt-Outs for The Sale or Sharing of Personal Information. We engage in online advertising practices (and certain analytics or similar activities) for targeted advertising and cross-context behavioral advertising. To turn off targeted and behavioral advertising through cookies, please click on the “Manage Cookies” link in the footer of our Sites and ensure that Analytics and Advertising cookies are disabled.

Please note that we may not be readily able to associate your personal information with your IP address or Device ID. And that you will only be opt-ed out of online sales or sharing of data through targeted or behavioral advertising. Refer to the “Exercising Your Rights” section above if you would like to extend your opt-out request beyond the online advertising practices described above.

Global Privacy Control and Opt-Out Preference Signals. Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “Global Privacy Control” or other opt-out preference signals. If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Analytics and Advertising cookies and similar technologies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

Virginia Privacy Rights

This section applies to residents of Virginia.

Your Rights. Depending on your state of residence and subject to certain limitations and exceptions, you may have the following rights with respect to your personal data:

- You have the right to request that we confirm whether or not we are processing your personal data and to access your personal data.
- You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows data portability.
- You have the right to correct inaccurate personal data that we hold about you, taking into account the nature of the personal data and the purposes of the processing of the data.
- You have the right to request that we delete personal information that we have collected from you or obtained about you.
- You have the right to opt-out of the processing of your personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) automated decision-making or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Exercising Your Rights. To exercise any of your rights, please use our [webform](#) or call us toll free at 866-219-2874. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation. In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us.

Appealing Our Decision. If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response. You may exercise your appeal rights by emailing us at privacy@sterling.com.

Please include your full name, the basis for your appeal, and any additional information to consider.

Cookie-Based Opt-Outs for The Sale or Sharing of Personal Information. We engage in online advertising practices (and certain analytics or similar activities) for targeted advertising and cross-context behavioral advertising. To turn off targeted and behavioral advertising through cookies, please click on the “Cookie Preferences” link in the footer of our Sites and ensure that Analytics and Advertising cookies are disabled. Please note that we may not be readily able to associate your personal information with your IP address or Device ID. And that you will only be opt-ed out of online sales or sharing of data through targeted or behavioral advertising. Refer to the “Exercising Your Rights” section above if you would like to extend your opt-out request beyond the online advertising practices described above.

Global Privacy Control and Opt-Out Preference Signals. Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “Global Privacy Control” or other opt-out preference signals. If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Analytics and Advertising cookies and similar technologies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

United Kingdom Privacy Rights

This section applies to residents of the United Kingdom.

Controller. The controller of your personal information is Sterling Group Companies.

Representative. Our UK Representative is Olivier Willocx. Our UK Representative may be contacted at info@edpo.com.

Disclosure and Cross-Border Transfer. Personal information that is shared with affiliates and third parties as described in this Privacy Policy is done pursuant to contracts that include the requisite protections under applicable data protection laws. In accordance with these laws, transfers of personal information outside of the United Kingdom are conducted in accordance with compliant arrangements such as international data transfer agreements or legally recognized certifications and adequacy decisions. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Lawful Basis for Processing Personal Information. The lawful basis for our collection and use of your personal information described in this Privacy Policy is that the processing is (i) necessary for our legitimate interests in carrying out our business, provided those interests are not outweighed by your rights and interests; (ii) necessary to perform a contract with a third-party or with you; (iii) necessary to comply with a legal obligation; or (iv) based, when necessary and appropriate, on your consent.

Special Categories of Data. Unless we specifically authorize you to do so, do not send us any Special Categories of Data, which is defined under applicable data protection laws as personal data revealing

racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric characteristics, health, or sexual orientation.

Segmentation and Automated Decision Making. We do not use segmentation or automated decision-making without human intervention, including profiling.

Your Rights Over Your Personal Information. Subject to certain exceptions and limitations, you have the right to:

- Ask us to confirm whether we are processing your personal information.
- Ask us to provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.
- Request that we update or correct your personal information when it is inaccurate or incomplete.
- Request that we delete your personal information in certain circumstances.
- Request that we limit processing or stop processing your personal information in certain circumstances including for marketing activities and profiling for marketing activities and profiling for statistical purposes and, subject to certain exceptions, where such processing is based on our legitimate business interests.
- Withdraw or revoke consent previously granted to the extent permitted by law.

Exercising Your Rights. To exercise any of your rights, please use our [webform](#) or call us toll free at 866-219-2874. We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity.

You also have the right to lodge a complaint with the Information Commissioner's Office. The ICO's complaint procedures may be found at <https://ico.org.uk/make-a-complaint/>.

Contact Us

If you have any questions about this Policy or our data practices, please email us at privacy@sterling.com.

Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the Site where this appears. Please check our Sites periodically for updates. The "Last Updated" legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Sites.