



# Privacy Policy

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## Review and Approval History

Sterling Claims Management understands the importance of keeping the Privacy Policy updated and relevant to the current business environment. The policy will be reviewed, by the Risk Management Committee, on no less than an annual basis, in order to address any changes and/or updates that may need to be made.

Version Number	Reviewed/ Edited By	Title	Comments	Date	Approved Yes/No
1.0	CCole	Compliance Director	Stand-alone policy created to detail Sterling's Privacy Policy	06/2020	Yes
1.0	CCole	Compliance Director	Annual Rvw. Completed. No Changes.	06/2021	Yes
2.0	CCole	VP Risk & Compliance	Annual Rvw. Updated to Sterling Standard Font.	06/2022	Yes
3.0	CCole	VP Risk & Compliance	Revised to include online privacy provisions	09/2022	Yes
3.0	CCole	VP Risk & Compliance	Annual Rvw. No Changes.	09/2023	Yes
3.1	CCole	VP Risk & Compliance	Sterling Logo Updated	07/2024	Yes
3.1	CCole	VP Risk & Compliance	Annual Rvw. No Changes	09/2024	Yes

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## **Section 1 - Scope**

This policy applies to all Sterling Claims Management employees and affiliates, including contractors, consultants and vendors. It addresses privacy policy and controls for 'Personally Identifiable Information' (PII) that is provided to Sterling by its clients, submitted via Sterling's contact us page on [sterlingclaimsmanagement.com](http://sterlingclaimsmanagement.com) and used and/or stored by Sterling Claims Management in accordance with contracted services provided.

## **Section 2 - Purpose**

The purpose of this privacy policy is to indicate how Personally Identifiable Information (PII) is being used and/or stored, by Sterling Claims Management, in the performance of contracted services on behalf of its clients and/or that is submitted via Sterling's website. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle Personally Identifiable Information in accordance with our contracted services.

## **Section 3 - Policy**

When do we collect Personally Identifiable Information (PII)?

Limited PII is provided to Sterling Claims Management, by its clients, via damage reports that are uploaded into Sterling's proprietary claims database, in order to perform contracted hazard insurance claim services on behalf of its clients.

Additionally, Sterling collects limited PII via the contact us page on [sterlingclaimsmanagement.com](http://sterlingclaimsmanagement.com).

Sterling does not represent individual consumers/borrowers and never collects information directly from them.

## How do we use Personally Identifiable Information (PII)?

The PII provided by clients, and stored by Sterling, is generally limited to borrower name, loan number and property address. This information is required in the filing of hazard insurance claims on behalf of our clients and is used solely for that purpose.

PII submitted via Sterling's website is used solely for the purposes of communicating to those that voluntarily submit their data, requesting further information regarding the services we provide.

PII is not sold or disseminated to third parties for any purpose.

## How do we protect Personally Identifiable Information (PII)?

At Sterling Claims Management, we understand our clients are under tremendous scrutiny and must adhere to certain regulations around the use and protections of consumer PII. As a hazard insurance claims management vendor, we are an extension of our client. This means we take privacy and protection of PII very seriously.

The Gramm-Leach-Bliley Act is a federal law that requires financial institutions (our clients) to explain how they share and protect their customers' private information. Although Sterling does not provide services directly to financial consumers, we still must maintain processes and procedures in place to protect the information we receive from our clients, and potential clients interested in our services. This includes secured access to client data, a corporate Information Security program, as well as numerous other policies/procedures and technological safeguards designed to ensure the proper use, safety and security of PII.

Personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all PII provided to, and stored by Sterling, is encrypted.

## **Section 4 - Non-Compliance and Disciplinary Action**

An employee found to have violated Sterling's privacy policy, and any other policy and/or procedure designed to maintain the safety and security of PII may be subject to disciplinary action, up to and including termination of employment.

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