



# Stirlingshire

Better for Clients + Better for Advisors

## Privacy Policy

The following information contains the privacy policies of Stirlingshire BD LLC (“Stirlingshire”), doing business as Stirlingshire which is a registered broker-dealer and member of FINRA and SIPC. Stirlingshire provides online and mobile application-based stock brokerage services to investors. The privacy policy is designed to protect the confidentiality of current and former clients (“you”) of Stirlingshire. Stirlingshire and APEX Clearing have established a relationship with you as a result of your opening an account with Stirlingshire and APEX Clearing. This means we receive your nonpublic personal information for the sole purpose of servicing your account.

This information is presented to you in conformity with 15 U.S.C. 6801-6810 and the Securities and Exchange Act of 1934 as amended by 15 U.S.C. 6801-6810. The nonpublic personal information which identifies you and your account is hereafter referred to as “personal information”.

Maintaining the security and confidentiality of your personal information is a Stirlingshire and APEX Clearing priority. We take precautions to safeguard client personal information at all times, and we will remain vigilant in protecting that information. The following information will explain our privacy policy in more detail.

### **YOUR NON-PUBLIC PERSONAL INFORMATION**

Stirlingshire AND APEX Clearing DO NOT SELL YOUR NONPUBLIC PERSONAL INFORMATION. WE WILL ONLY DISCLOSE YOUR NONPUBLIC PERSONAL INFORMATION, WHICH INCLUDES ANY PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOU, AS INDICATED IN THIS POLICY, IF WE HAVE OBTAINED YOUR CONSENT IN EITHER THIS DOCUMENT OR OTHER AGREEMENTS OR WE ARE REQUIRED BY LAW TO DISCLOSE SUCH INFORMATION. NOT INCLUDED IN THIS IS ANY INFORMATION WILLINGLY SHARED BY A CLIENT VIA THE APP, WEBSITE OR FUTURE PLATFORMS, INCLUDING BASIC PROFILE INFORMATION, AND AGGREGATED DATA (DEFINED FURTHER BELOW):

### **NON-PUBLIC PERSONAL INFORMATION COLLECTED**

#### **1. Information from you**

- 1.1. Information you provide on an application for an account, or any other financial product or service, whether in writing, in person, by telephone, electronically or by any other means, such as your name, address, social security number, assets, income and debt; and
- 1.2. Information we obtain for the purpose of tax reporting to you and the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (IRS) forms that we collect for tax reporting purposes.

## **2. Information about your transactions with us**

- 2.1. Information that relates to account balances, payment history, trading activity and any other such transactions for which Stirlingshire provides brokerage services. Trading information shared by users via the social feed will be considered public information and not subject to this privacy policy.
- 2.2. Information we collect as part of authentication for purposes of servicing your account in a secure and confidential fashion; and
- 2.3. Information we collect through Internet “cookies” (an information collecting device from a web server).

## **3. Information about your transactions with nonaffiliated third parties**

- 3.1. Information provided to other nonaffiliated third parties as required by law, including information shared in connection with a subpoena or other legal document compelling our compliance; and
- 3.2. Information related to servicing your account for purposes of providing clearing services.

## **4. Information from a consumer-reporting agency**

- 4.1. Information from a consumer reporting agency regarding your creditworthiness or credit history or other information with regard to lending;
- 4.2. Information about the fact that you are a customer of Stirlingshire and Stirlingshire BD LLC. and we have provided you a financial product or service; and
- 4.3. Information from other outside sources regarding their employment of, credit to, or other relationship with you, or verifying representation made by you, such as your employment history, loan or credit card balances.

## **5. Third-Party Providers.**

Some of the functions within our app may be provided, developed, or hosted by third parties that are not affiliated with Stirlingshire. These entities may collect, process, or receive information you provide within the app, including information about your use of our app and your activities obtained through automated data collection and screen recordings. Please be advised that all private user information is protected and obscured with extreme prejudice in accordance with their applicable privacy policies and business practices.

## **6. USE OF INFORMATION**

We use the aforementioned information to:

Fulfill your requests for information and to improve bug reporting and user issue resolution; Analyze the use of our site, app, and services for our purposes, such as product and service enhancements; Research and develop new products and services; Authenticate you; Secure and improve our network and services; Detect and prevent potentially prohibited, fraudulent or illegal activities and otherwise in accordance with our Terms of Use; and for any other purposes disclosed to you at the time we collect your information or with your consent

Stirlingshire and APEX Clearing restrict access to your personal account(s) and information to those employees who need to know that information to provide products and services to you. We maintain physical, electronic, and procedural safeguards that meet or exceed industry standards to safeguard your nonpublic personal information. Third parties who have access to such personal information must agree to follow appropriate standards of security and confidentiality. Clients should be advised that in order to better serve you, telephonic communications may be recorded or monitored for quality control.

Stirlingshire may at any time revise this Privacy Policy by updating this document. You will receive advanced notice of any changes. You agree to be bound by subsequent revisions and agree to review this Privacy Policy periodically for changes. The most updated version of this document will be available for your review on the Stirlingshire Website.

We trust this clarifies our position on client confidentiality, and look forward to being of service to you.