

STERLING LABS PRIVACY POLICY

Last Updated: September 25, 2026

TM37 Inc. (d/b/a Sterling Labs) (“Sterling Labs,” “we,” “us,” or “our”) is committed to protecting the privacy and security of personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard information in connection with www.sterlinglabs.co, the Sterling Labs mobile/desktop application, APIs, and related services (collectively, the “Platform”), including Sterling Labs’s online advisory services and tools.

This Privacy Policy is intended to address Sterling Labs’s privacy practices in connection with the Platform and to be consistent with Sterling Labs’s Advisory Client Agreement, Form ADV, and applicable U.S. federal and state privacy requirements, including Regulation S-P. It does not modify or supersede any applicable advisory agreement or disclosure document.

1. SCOPE AND APPLICABILITY

This Privacy Policy applies to:

- Visitors to Sterling Labs’s websites
- Registered users and subscribers to the Platform
- Prospective and existing advisory clients, including clients who elect optional Portfolio Services

Where an Advisory Client Agreement or other advisory disclosure addresses the same subject, that document governs the advisory relationship to the extent of any conflict.

2. INFORMATION WE COLLECT

2.1 Personal Information You Provide

We may collect the following categories of information when you interact with the Platform:

- Identifying Information: name, email address, telephone number, username, and other contact details

- **Account and Profile Information:** Sterling Labs account credentials, user preferences, subscription status, investment-profile information, and, for certain brokerage integrations, identifying information associated with a linked brokerage account such as the account holder's name and email address
- **Billing Information:** payment method details and transaction history processed by third-party payment processors; Sterling Labs does not store full payment card numbers
- **Communications:** inquiries, support requests, feedback, legal notices, and other correspondence
- **User-Submitted and Advisory Content:** prompts, queries, uploaded materials, portfolio information you choose to enter, preferences, investing style, risk tolerance or appetite, investment objectives, constraints, and other inputs submitted through the Platform

If you opt into Portfolio Services and link an existing brokerage account through an authorized API connection, Sterling Labs also receives information about the linked account, including holdings, positions, balances, transaction information, and account activity. Sterling Labs does not store brokerage-account usernames or passwords and does not hold credentials or permissions that allow it to withdraw or transfer cash or securities from your brokerage account. If the optional order-transmission functionality is made available and you elect to use it, Sterling Labs may transmit only trade instructions that you initiate or authorize to your linked broker-dealer.

2.2 Information Collected Automatically

When you access or use the Platform, we automatically collect:

- **Technical Information:** IP address, browser type, device identifiers, operating system, and approximate location inferred from IP address
- **Usage and Interaction Data:** pages viewed, features used, timestamps, session duration, and interactions with Platform tools
- **Log and Diagnostic Data:** system activity, error logs, security events, and performance metrics

- Cookies and Similar Technologies: used for authentication, security, analytics, session management, and functionality

2.3 Information from Third Parties

We may receive information from third parties, including:

- Market data, content, and AI model providers
- Identity, authentication, and security services
- Payment processors and subscription-management providers
- Linked broker-dealers and API/integration providers, where you elect Portfolio Services, as well as analytics and infrastructure providers

We use third-party information only as described in this Privacy Policy, the Advisory Client Agreement, and applicable disclosures and regulatory requirements.

3. HOW WE USE INFORMATION

Sterling Labs uses collected information for the following purposes:

- Operating, maintaining, securing, and improving the Platform and Services
- Providing non-discretionary investment research, analytics, and advisory outputs and, for clients who elect Portfolio Services, personalized ongoing investment advice based on linked-account data and investment-profile information
- Authenticating users and managing accounts and subscriptions
- Processing subscription fees, purchased platform credits, and payments
- Improving Platform functionality, reliability, security, analytics, research, testing, and service development, including through aggregated or de-identified information
- Monitoring for fraud, security issues, misuse, or violations of our terms
- Responding to inquiries, providing operational customer support, and communicating about accounts, billing, service updates, and legal notices
- Complying with legal, regulatory, recordkeeping, and compliance obligations and enforcing agreements

For clients who elect the optional order-transmission functionality within Portfolio Services, Sterling Labs uses the information necessary to transmit client-initiated or client-authorized trade instructions to the linked broker-dealer. Sterling Labs does not provide discretionary investment management and does not withdraw, deposit, or transfer client assets.

4. INVESTMENT ADVISORY CONTEXT

Sterling Labs is an SEC-registered internet investment adviser. Its standard Platform provides non-discretionary, technology-enabled investment research, analytics, and advice. Clients who opt into Portfolio Services receive personalized, ongoing investment advice informed by linked brokerage-account data and investment-profile information. In that context:

- Personal information is handled in a manner consistent with Sterling Labs's advisory obligations and applicable confidentiality requirements
- Sterling Labs may access and review linked-account data on an ongoing basis only while a client remains opted into Portfolio Services; if the client opts out, Sterling Labs ceases accessing linked-account data on a going-forward basis
- Sterling Labs does not take custody of client funds or securities, open brokerage accounts for clients, or deposit, withdraw, or transfer cash or securities

Nothing in this Privacy Policy expands the scope of advisory services described in Sterling Labs's Advisory Client Agreement, Form ADV, or Form CRS.

5. USE OF AUTOMATED SYSTEMS AND AI

The Platform uses automated systems, including machine learning and large language model-based systems, to process user inputs and generate research, analytics, and advisory outputs.

- User interactions may be processed to operate, evaluate, secure, and improve Platform performance and Services
- Sterling Labs may use aggregated and de-identified data for research, testing, product development, and improvement of the Platform and Sterling Labs's models

- Sterling Labs's third-party AI model providers operate under contractual terms that disclaim use of client data for model training. Client data processed through those models is used to generate responses and is not used to train, improve, or develop the providers' models or third-party models. Certain providers may retain client data for a period of time under their own retention practices; Sterling Labs opts into minimal or zero-retention settings to the extent practicable.

Users retain rights in submitted content, subject to licenses granted under Sterling Labs's Terms of Use and applicable advisory agreements.

6. INFORMATION SHARING AND DISCLOSURE

Sterling Labs does not sell personal information and does not share personal information with third parties for their own marketing.

We may share information only in the following circumstances:

6.1 Service Providers, Affiliates, and Linked Broker-Dealers

We may share information with vendors that perform services on our behalf, including cloud hosting, security, customer support, analytics, market-data services, AI model services, and payment processing, and with Sterling Labs affiliates to help provide, maintain, or improve the Services. Service providers are required to protect information and use it only to provide contracted services. If you opt into Portfolio Services, Sterling Labs may exchange information with the broker-dealer you link through the authorized API connection to receive account and holdings data and, if you elect order transmission when available, to transmit your authorized trade instructions.

6.2 Legal and Regulatory Requirements

We may disclose information when permitted or required by law, regulation, legal process, court order, or governmental or regulatory authority, or when reasonably necessary to protect Sterling Labs's rights, property, security, users, or legal obligations.

6.3 Business Transfers

We may share or transfer information in connection with a merger, acquisition, financing, reorganization, or sale of assets, subject to continued protections consistent with this Privacy Policy and applicable law.

7. DATA RETENTION

Sterling Labs retains information as follows, subject to applicable law and regulatory recordkeeping requirements:

- During an active relationship, information is retained as reasonably necessary to provide the Platform and Services, fulfill contractual and advisory obligations, secure the Platform, resolve disputes, and comply with legal, tax, and recordkeeping requirements
- Upon termination or lapse of an advisory client's subscription, Sterling Labs will retain the client's personal information for twelve (12) months following the effective date of termination, after which Sterling Labs will delete that personal information in accordance with this Privacy Policy
- A former client may request deletion before the end of the twelve-month period by contacting Sterling Labs; Sterling Labs will process the request promptly, subject to records that must be retained under applicable law or regulation
- Sterling Labs will retain records of advisory communications, investment advice, and related documentation for the periods required by applicable books-and-records requirements, even where other personal information is deleted

8. DATA SECURITY

Sterling Labs maintains administrative, technical, and physical safeguards designed to protect information, including:

- Encryption of data in transit and at rest where appropriate
- Access controls, authentication procedures, vendor due diligence, and contractual safeguards
- Monitoring, logging, and incident response protocols

Despite these measures, no system can be guaranteed to be completely secure. If Sterling Labs determines that an unauthorized party has accessed sensitive personal information, Sterling Labs will provide notices as required by applicable law.

9. YOUR PRIVACY RIGHTS

Depending on your jurisdiction and applicable law, you may have the right to:

- Access personal information Sterling Labs holds about you
- Request correction or deletion of certain personal information
- Restrict or object to certain processing activities or receive information about Sterling Labs's privacy practices

Requests are subject to verification and applicable legal and regulatory limitations. You may submit a privacy request by emailing privacy@sterlinglabs.co or calling 347-924-2008.

10. CALIFORNIA PRIVACY RIGHTS

California residents may have additional rights under applicable California privacy law. Sterling Labs does not sell personal information and does not share personal information for cross-context behavioral advertising as those terms are defined under California law. Sterling Labs does not use or disclose sensitive personal information to infer characteristics about users. California residents may request access, deletion, or correction of personal information, subject to applicable exceptions, and Sterling Labs will not discriminate against a user for exercising applicable privacy rights.

11. INTERNATIONAL USERS

The Platform and advisory relationship are intended for lawful residents of the United States and its territories. Information may nevertheless be transferred to and processed in countries other than the United States by service providers supporting the Platform, and those jurisdictions may have different data-protection laws.

12. CHILDREN'S PRIVACY

The Platform is not intended for individuals under 18 years of age. Sterling Labs does not knowingly collect personal information from children under 13. If Sterling Labs learns that it has collected personal information from a child under 13, it will delete that information as required by applicable law.

13. UPDATES TO THIS PRIVACY POLICY

Sterling Labs may update this Privacy Policy from time to time to reflect changes in its practices or legal requirements. Sterling Labs will post the updated policy on the Platform with a new effective date and, when required or where the change is material to the client relationship, will provide notice through the Site or App, a message through the Platform, or email to the address associated with the user's account.

14. CONTACT INFORMATION

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