Privacy Policy

(Effective Date: November 5, 2026)

Sterling Surplus, LLC. and its operating subsidiaries (“Sterling Flood”, "we" or "us") are committed to protecting your privacy and the confidentiality of your personal information. Personal information is any information that directly identifies or reasonably can be used to identify a user ("you").

This Privacy Statement explains how Sterling Flood uses the personal information that we collect or that you otherwise provide when you communicate with us or use our services:

- Online through our websites, including but not limited to http://www.sterlingflood.com (the “Sites”), any portal made available by us (the “Portals”), and our social media pages which are available from the Sites (“Social Media Pages”) (collectively, the Sites, Portals, and Social Media Pages are referred to as “Sterling Online Services”); and
- From other sources such as your application(s), contracts or other agreement(s) with Sterling Flood, claim forms and related or supporting documentation, written or oral communications with Sterling Flood or third parties involved in our business with you.

This Privacy Statement informs you of your rights with respect to your personal information that Sterling Flood collects, uses, and discloses.

By using any of the Sterling Flood Online Services or by providing your personal information, you accept the policies and practices stated in this Privacy Statement.

When and how does Sterling Flood collect your personal information?

In general, we may collect personal information about you, directly and indirectly, depending on your relationship with us -- whether as an individual client, agent, broker, a policyholder, claimant, employee of our corporate and association clients, family member of any such person, or other person who we employ or with whom we do business.

Specifically, we may collect your personal information from the following sources:

- You or your family member orally or in paper and/or online applications or other documents for insurance, employment, or other services.
- Third parties, such as insurance companies, brokers or agents, medical professionals, financial institutions, motor vehicle and driver licensing authorities, recruiters, and sources of publicly available information.

- Affiliates, subsidiaries, insurers, intermediaries, third party providers, and others in connection with providing or responding to a request for services.
- Consumer or credit reporting agencies.

What personal information does Sterling Flood collect?

We may collect and have collected the following categories of personal information about you and/or your dependents:

- **Personal identification**
  Name; date of birth; gender; race/national origin; physical traits; contact details (home and work address, telephone numbers, email addresses); and user name, password, password reminder questions and answers for Sterling Flood Online Services.
- **Background data**
  Marital status; family history; educational history; employment history and job titles; professional licenses and affiliations; and relationship to the policyholder, insured or claimant.
- **Financial data**
  Bank account number; other account numbers and details for financial institutions or credit cards or payment cards; income; assets (real and personal property); liabilities; credit history and credit score; history of insolvency; and other financial information.
- **Audio and electronic information**
  Customer service phone calls and videotaped interviews.
- **Geolocation**
  Where you are located, such as city and state.
- **Data that allows Sterling Flood to provide you with insurance services or products, including commercial information**
  Details about your business and status as an insurance agent or broker; your status as owner, director, shareholder, member or partner, or other ownership or management interest in an organization; policy and claim numbers; prior or present insurance policies, coverage and claims; photographs or video recordings received in the course of business such as claims processing; location and identification of insured property such as property address, vehicle license plate, identification number, registration number, or safe deposit box location and number; other insurance you hold; records of services and products you have obtained from us;

and other data in activity notes and emails based on our previous communications with you.

- **Other information**
  In the course of doing business with you, we may obtain other information about you, such as your history of civil claims and lawsuits, criminal record, or job performance. This may include professional or employment-related information as well as education information.
- **Your preferences**
  We may note your preferred form of communication and marketing and record the interest you show in our services and products.
- **Social media account information**
  When you use our Portals or follow our Social Media Pages, Sterling Flood may receive additional personal information from you, including personal information that is part of your profile relating to those accounts or your friends' profiles. Please review the applicable privacy policies for your social media accounts. We are not responsible for the data collection or the privacy practices of any social media accounts.
- **Inferences**
  We may draw inferences from any of the information identified in this subdivision to create a profile about you, such as your behavior, attitude, and aptitude.
- **Information from other sources**
  We may also collect personal information about you from other sources, including commercially available sources and our business affiliates or partners.
- **Information you provide to us**
  You may provide us with personal, corporate, or other information on your clients, insureds, or other individuals through our Sterling Flood Online Services.

What sensitive personal information does Sterling Flood collect?

We may collect the following categories of sensitive personal information about you and/or your dependents:

- **Government-issued identification**
  Identification numbers include but are not limited to Social Security number, other

tax identification number, Medicare number, passport number; military identification number, and driver's or other license numbers.

- **Health and medical data**
  Current or former physical or mental or medical condition; biometric and genetic data; history of medical procedures or surgeries; date and cause of injury, disability or death; medication information; medical insurance information; and relevant personal habits such as smoking or drug and/or alcohol consumption.

- **Other sensitive information**
  In the course of doing business with you, we may obtain other sensitive information about you, such as data regarding your citizenship and immigration status, sexual orientation, veteran or military status, religious or similar beliefs, or preferences for medical treatment.

Please note that we do not use your sensitive personal information to infer characteristics about you.

Does Sterling Flood sell your personal information?

We do not sell or share any personal information collected on users to third parties, including that of consumers under the age of sixteen. Sterling Flood may share personal information on a user's clients in accordance with agreements in place with the user or the user's employer or company if such information is provided to us through one of our Sterling Flood Online Services.

How does Sterling Flood use your personal information?

We use and disclose and have used and disclosed your personal information in order to operate our business:

Communications. We use your personal information to communicate with you and others for reasons such as:

- to give you information that you requested from us about our services or products;
- to communicate with you regarding your account or your business or employment relationship with us; and
- to advise you of changes to any of the Sterling Flood Online Services or any service or product we provide.

Business purposes. We use and disclose your personal information or that which you provide to us in running our business such as:

- to determine eligibility and process applications for insurance services and products;
- to facilitate transactions such as payments and claims handling;
- to perform general business operations including audit; accounting and finance; billing and collection; data storage; website hosting; information technology functions; product development; records and information retention; fraud and risk management, detection, and prevention; maintain or service accounts; provide customer support; process or fulfil orders and transactions; verify customer information; process payments; provide financing; provide analytic services; provide storage; or other similar services;
- to permit you to use the interactive features of the Sterling Flood Online Services;
- to conduct data analytics in order to evaluate and improve existing, business operations, services, and products and develop new or improved features, services, or products;
- to confirm an individual's identity and handle a request to know or delete personal information, as permitted by law;
- to secure your personal information to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- to debug or identify and repair errors that impair existing intended functionality;
- to undertake internal research for technological development and deployment;
- in any other way we disclose when you provide the information; and
- for any other purpose for which you give consent.

Legal. We use and disclose your personal information for legal purposes such as:

- to fulfill our obligations and enforce our rights under any contract between you and us;
- to comply with legal and regulatory obligations and legal process such as court orders and subpoenas;
- to respond to lawful inquiries from governmental, regulatory, and other authorities; and
- to obey all applicable laws.

Promotional Marketing. Sterling Flood uses and discloses your personal information to provide you with information relating to new or improved service or product such as:

- to audit our ad impressions, including our ad impressions to unique visitors, verify positioning and quality of ad impressions, and auditing compliance with this and other standards;
- to deliver marketing content or promotional communications that may be of interest to you; and
- to transmit direct marketing, including newsletters, emails, or other information that you have requested.

Unsubscribe. Sterling Flood uses and discloses your personal information to maintain a list of individuals who have unsubscribed from our mailings or electronic communications.

Who does Sterling Flood share your information with?

In order to provide you and others with insurance services and products, we may disclose the above categories of personal information to:

- Our subsidiaries, operating companies, carriers, agents, and affiliates;
- Consultants, vendors, and other service providers, who (i) process or complete the transaction for which the information was provided or (ii) provide services for Sterling Flood such as payment and application processing, marketing, technical support, webhosting, data storage, or data analysis and need your personal information to perform said work services and are contractually restricted from using or disclosing the personal information except as necessary to perform services on our behalf or to comply with legal requirements;
- Any entity that is needed to protect the rights and property of Sterling Flood and our employees, agents, users, and other third parties or to prevent physical harm or financial loss of Sterling Flood, our users, or any third party;
- Regulatory, governmental, or other legal authorities to respond to lawful requests for information;
- A third party in order to comply with a court order, subpoena, search warrant, other legal process, or law;
- An interested buyer (in the course of due diligence), actual buyer, or successor of some or all the assets of Sterling Flood; and

- Any third party with your authorization or for any other purpose disclosed by us when you provided your information.

How is your personal information protected?

Sterling Flood has implemented physical, electronic, and technical safeguards to protect your personal information, consistent with applicable privacy and data security laws. However, we cannot completely guarantee security of your personal information. You can help safeguard your personal information by keeping confidential and private all user names, login, and passwords used to connect with Sterling Flood Online Services.

If you have reason to believe or know that your login and password for the Portals, your account with us, or your personal information has been compromised, please contact us at the email address or telephone number below.

info@sterlingflood.com 855-227-2202

How long does Sterling Flood keep your personal information?

We will retain your personal information for as long as it is reasonably necessary, depending on the relevant legal and regulatory obligations and/or the duration of our business relationship with you, your employer, or another related entity.

In certain circumstances, we may store your personal information for longer periods of time if we reasonably believe there is a possibility of a future complaint, dispute, or litigation or there is another valid business reason the information may be necessary in the future.

We will securely delete or erase your personal information if there is no valid business reason for retaining that information.

Does Sterling Flood collect non-personal information?

Yes. When you use our Sites or Portals, we collect certain non-personal information that does not disclose your specific identity. Non-personal information is collected through various technologies, including the following:

- **Cookies & Tracking Technologies**
  We may use various types of cookies on Sterling Flood Online Services. Please check your browser for more information. Additionally, when you visit with our Sites or Portals, Sterling Flood automatically receives and records cookie information

from your browser. The cookie information includes your browser type, the webpage you were visiting before you came to our Sites, pages of our Sites or Portal that you visit, the time spent on those pages, information you search for on our Sites, how you use the Portals, and access times and dates. We use this information to monitor and analyze use of the Sites and the Portals.

We may also use other technologies such as clear GIFs, pixel tags, or web beacons to count users who have visited our webpages, for related website statistics, and to compile tracking information related to our email marketing or other promotional campaigns.

Third Parties may also add cookies from time to time to Sterling Flood Web Services. We regularly monitor to ensure only approved cookies are present. However, if you use Sterling Flood Web Services between our regular efforts to monitor for new cookies by third parties, you understand that you use the Sterling Flood Web Services at your own risk, and you understand that to the greatest extent permitted by law, Sterling Flood liability for third party trackers or cookies is hereby waived by you and disclaimed by us. In jurisdictions where that waiver and disclaimer is contrary to public policy, you and we agree that we will treat the term as stricken without striking any other portion of this Privacy Statement.

We permit you to control the use of certain cookies in accordance with your elections in our cookie banner.

- **Third-Party Analytics**
  We use third-party service providers and services, including but not limited to Google Analytics, to collect and examine information about use of the Sites or Portals. These service providers and services may utilize tracking technologies such as cookies to collect personal information. The following link provides an explanation of how Google Analytics collects and processes data and how you can control the information that is collected about you (https://policies.google.com/technologies/partner-sites).

Privacy Rights for California Residents and Other State Privacy Rights

California

- **Notice at Collection**

In accordance with our Privacy Statement, we collect the following categories of personal information: identifiers, commercial information, geolocation, internet or other electronic network activity, professional or employment-related information, inferences, and sensitive personal information. We collect these categories for our business or commercial

purposes, including to determine eligibility and process applications for insurance services and products, for our general business operations, and to conduct data analytics to evaluate and improve our operations. We do not sell or share your personal information. We will retain your personal information for as long as is reasonably necessary depending on our relevant legal and regulatory obligations.

- **Shine the Light**

California Civil Code section 1798.83, also known as the "Shine The Light" law, permits California residents to ask for and receive from us once a year, without charge, information about their personally identifiable information, if any, that we disclosed to third parties for direct marketing purposes in the preceding calendar year, if at all. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared such information in the immediately preceding calendar year. If you are a California resident and want to make such a request, please submit your request to info@sterlingflood.com.

Please note that not all information sharing is covered by the "Shine the Light" requirements, and only information on covered sharing will be included in our response. Please be informed that we are only required to respond to one consumer request in each calendar year.

Sterling Flood does not sell any of your personal information to third parties for their use in direct marketing, advertising, or promotion of their products or services.

- **"Do Not Track" or other Opt-Out Preference Signals**

"Do Not Track" and the Global Privacy Control, are privacy settings that you may set in your web browsers. If turned on, these settings direct websites, analytics companies, ad networks, plug in providers, and other web services you encounter while browsing, to stop tracking your activity. Presently, we do not respond to "Do Not Track" browser settings or other opt-out preference signals.

California and Other States

Depending on your state of residence and in accordance with applicable law, you may have certain privacy rights ("Privacy Rights"):

Right to know your collected personal information. You may request that we identify the (i) categories of personal information we collected about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting the information; (iv) the categories of third parties with whom Sterling Flood discloses or shares the personal information; and (v) the specific pieces of personal

information that we have collected about you. You may also request to know specific pieces of personal information as well as a list of specific third parties to whom we have disclosed personal information about you.

Right to know your disclosed personal information. You may request that we state (i) whether we have disclosed any of your personal information to third parties for a business or commercial purpose; and (ii) list the categories of personal information that we have disclosed, if any, to third parties for a business or commercial purpose.

Right to request deletion of personal information. Subject to legal exceptions, you may request that we delete your personal information.

Right to correct inaccurate personal information. Subject to legal exceptions, you may request that we correct inaccurate personal information.

Right to opt-out of certain uses of your personal information. You may request to opt-out of the use of your personal information for: (i) targeted advertising, (ii) the sale of your personal information, and (iii) any profiling in furtherance of decisions that produce legal or similarly significant effects.

Right to limit our use and disclosure of your sensitive personal information. You may request that we limit our use and disclosure of your sensitive personal information. However, please note that we only use and disclose your sensitive personal information for uses or disclosures that are reasonably necessary.

We will not discriminate or retaliate against you for exercising any Privacy Rights you may have under applicable law. In accordance with applicable law, you may also exercise your right to appeal our response by contacting us as outlined below.

If you want to exercise any Privacy Right or if you have questions or concerns about Sterling Flood privacy policies and information practices, you may contact us at: info@sterlingflood.com or 1-855-227-2202.

You may also exercise any applicable Privacy Rights through an authorized agent. We will need documentation verifying that your designated agent is authorized to act on your behalf. We may not be able to fulfill your request if we are unable to verify that the agent is, in fact, authorized to act on your behalf.

Privacy of Children

Sterling Flood Online Services are not intended for children. We do not knowingly collect or solicit personal information from anyone under the age of 13 without parental consent. We do not knowingly allow anyone under the age of 13 to register for any services. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at the email address or telephone number below. We expect all information provided by online users to be truthful and correct regarding age and other information provided.

Use of AI and Chatbots

While not available on public versions of our Sites, it is possible that through the use of Sterling Flood Online Services, certain users may encounter chatbots. These are powered with Artificial Intelligence solutions and are not human interactions. These chatbots are not entitled to make any material decision for insureds or users.

Text Messaging

If you agree to receive text messages from Sterling Flood, we use your mobile number only to send the messages you asked for, such as a short survey after a call. Message frequency varies. Message and data rates may apply. Reply STOP to opt out or HELP for help. We do not sell, rent or share mobile numbers or text-messaging consent with third parties or affiliates for their marketing purposes.

Changes to this Privacy Statement

From time to time, Sterling Flood may update this Privacy Statement. Please note that the Effective Date at the top of the page shows when this Privacy Statement was last revised. We encourage you to review this Privacy Statement periodically so that you are informed of our current practices. By continuing to use any of the Sterling Flood Online Services after we post a newly updated Privacy Statement on the Sites, you consent to any changes we make to this Privacy Statement.

Contact Us

If you have questions regarding this Privacy Statement, any of Sterling Flood's privacy practices, or your personal information, please contact us at info@sterlingflood.com or call us at 1-855-227-2202.