

Sierra Investment Management Website Privacy Policy

Last Updated: January 2024

Sierra Investment Management (hereinafter “COMPANY”, “we”, “us” and “our”) values your privacy. This Privacy Policy (“**Privacy Policy**”) applies to our website located at sierrainvestment.com (the “**Site**”) and to our services we provide (the “**Services**”). The purpose of this Privacy Policy is to provide you with information concerning how we collect, use, maintain, and share your personal information in accordance with applicable data protection laws.

Information We Collect and Process

We may collect one or more of the following categories of personal information about our visitors to our Sites and individuals who use or may use our Services in the future. We collect this personal information when these individuals (i) visit or interact with our Sites; (ii) request additional information about our Services; or (iii) contact/interact with us.

Category of Personal Information Collected	Types of Personal Information	Sources of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Name (First/Last), Alias or Unique Personal Identifier, Postal Address, Email Address, IP Address, Account Name, Telephone Number, or Business.	Directly from you	Identification, Providing Services, Legal & Regulatory Compliance
Internet or other electronic network activity information	Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement.	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance
Professional or work-related information	Current or past job history.	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance

We do not collect the following categories of personal information:

Protected Characteristics	Race, color, ancestry, national origin, citizenship, religion or creed, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, marital status, age, medical condition, physical or mental disability, genetic information (including familial genetic information), veteran or military status	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance
Sensitive Personal Information	Social Security Number, Driver's License Number, Credit Card Number, Bank Account Information, State Identification Card, Passport Number, Racial or Ethnic Origin, Religious or Philosophical Beliefs, Genetic Data.	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance
Professional or work-related information	Current or past job performance, conduct, performance evaluations	Directly from you.	Identification, Providing Services, Legal & Regulatory Compliance

Other Automatically Collected Information: Whether you are a visitor to our Site, partner or potential partner, our servers automatically collect limited information about your computer when you visit our Site. This information may include the type of browser software you use, the operating system you are running, the IP address assigned to your computer or Internet connection, and the IP address of the website, if any, that referred you to our Site. We use this information to understand how visitors navigate through our Sites, to enhance your experience while using our Site, and to make the materials we post as valuable to visitors as possible.

Our direct marketing activities are governed by your consent. This includes situations such as when you reach out to us directly, share your business card, give consent to receive communications following an

event, or in similar scenarios. Additionally, we may utilize our legitimate interests to get in touch with you, offering related services that align with your interests, especially those related to services you have previously acquired from us or resources or demos you have requested.

We process this personal information as necessary for us:

- Fulfilling specific purposes that are transparent to you when you provide your Personal Information or granting access to our webinars or gated collateral. Additionally, we use this information to provide you with requested details about our services and to inform you about services we believe may interest you.
- Administering our websites and events and handling internal operations like troubleshooting, data analysis, testing, statistical analysis, and surveys.
- Enhancing the presentation of content on our websites to suit your preferences and device.
- Monitoring trends, conducting marketing, and advertising activities.
- Improving and securing our website and services to enhance your overall experience.

Disclosures of Personal Information

We do not sell your personal information as that term is defined under applicable data protection laws. However, in order for us to provide our Services, we may share your personal information with the following categories of recipients:

- Service Providers, including those who work to enhance our Site or Services and to protect the security of our systems.
- Partners, such as Google Analytics and Salesforce, to provide our Services to you.
- Legal/Regulatory Authorities, including to respond to a subpoena or court order, judicial process, or regulatory inquiry; to defend against fraud, lawsuits, claims or other liabilities; and to prevent physical harm or financial loss in connection with any suspected or actual illegal activity.

Cross-Border Transfers

We may transfer your personal information to a third party that is located in a jurisdiction other than the one from which we collected your personal information, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects.

Retention of Personal Information

We will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements, unless otherwise permitted or required by law.

Security of Personal Information

The security of all personal information provided to us is important and we take reasonable steps designed to protect your personal information. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Your Choices & Rights

Depending upon where you are located, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to have your personal information deleted. If you have questions about what rights may apply to you, please contact us at info@sierrainvestment.com.

Do Not Track: Our websites and apps are not designed to respond to "do not track" requests from browsers.

"Shine the Light" and "Eraser" Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties' direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of Sale or Sharing of Personal Information: Under the CCPA, as amended by the CPRA, California residents have the right to opt-out of the sale of their personal information and/or the sharing of personal information with third parties for the purposes of cross-contextual behavioral advertising or profiling by submitting a request. Please note that we do not sell personal information, including the personal information of any individuals under the age of 16, nor do we share any personal information for the purposes of cross-contextual behavioral advertising.

Your Right to Limit Use of Sensitive Personal Information: California residents have the right to request that we limit our use of any sensitive personal information to those uses, which are necessary to perform the Services or for other business purposes under the CCPA, as amended by the CPRA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, as amended by the CPRA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA, as amended by the CPRA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA, as amended by the CPRA.

Third-Party Links

We may provide links to other sites or resources provided by third parties. These links are provided for your convenience only. We have no control over the contents of those sites or resources and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any of the third-party links on the Site, you do so entirely at your own risk and subject to the terms and conditions of those sites.

Children

We do not knowingly collect personal information from children under the age of 13 through our Sites. If we learn that a child under the age of 13 has provided us with personal information, we will delete it in accordance with applicable law.

Changes to this Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing and using the Sites after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Contact Us

If you have any questions regarding this Privacy Policy or our privacy practices, please contact us at 844-727-1813.

You may also write to us at the following address: info@sierrainvestment.com