

**STERLING**

MULTIFAMILY TRUST

PRIVACY POLICY

## **1. Personal Information**

You may choose to provide personal information (such as your name, address, telephone number and email address) on the Sterling Multifamily Trust website. Here are some of the ways you may provide the information and the types of information you may submit. We also tell you how we may use the information.

### **a. Contact Us**

If you email us through the “[Contact Us](#)” link on this site, we ask you for information such as your name and email address so we can respond to your questions and comments. You may choose to provide additional information as well.

### **b. News Alerts**

If you would like to receive company [news alerts](#), we ask for your name and email address so we can send you the alerts you have requested.

### **c. Electronic Delivery of Annual Reports**

If you are a shareholder and would like to request electronic delivery of annual reports, you may do so on our [website](#).

### **d. Contact Sterling’s Audit Committee**

On <http://smftrust.com/>, we provide a phone number, a postal address and an email address so visitors can report complaints about Sterling Multifamily Trust’s accounting, internal accounting controls or auditing matters or other concerns to the Board of Trustees or Audit Committee. If you email us, please be aware that you will be providing us with your email address and any other information you include in your email.

## **2. Non-Personal Information**

We collect certain aggregate and non-personal information when you visit this website. Aggregate and non-personal information does not relate to a single identifiable visitor. It tells us such things as how many users visited our site and the pages accessed. By collecting this information, we learn how to best tailor our website to our visitors. We collect this information either through “cookie” technology or with “web beacons,” as explained below.

### **a. Cookies**

Like many companies, we may use browser cookies on this website. Browser cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We would use browser cookies to tell us, for example, whether you’ve visited us before or if you’re a new visitor and to help us identify site features in which you may have the greatest interest. Browser cookies may enhance your online experience by saving your preferences while you are visiting a particular site. The “help” portion of the toolbar on most browsers will tell you how to stop accepting new browser cookies, how to be notified when you receive a new browser cookie, and how to disable existing browser cookies. Remember though, without browser cookies, you may not be able to take full advantage of all our website features. We may also use flash cookies on our website to enhance your online experience. Flash cookies are similar to browser cookies, except that they can store data more complex than simple text. Flash cookies, by themselves, cannot do anything to or with the data on your computer. In addition, flash cookies cannot access or remember your email address or other personal information unless you provide the information on this site. We use flash cookies to provide you with a better user experience.

### **b. Web Beacons**

Certain pages on our site may contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). These web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the

page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party. We use log files to store the data that is collected through web beacons. Sterling Multifamily Trust may also use third party web beacons to help manage online advertising. These files enable us to recognize a unique cookie on your web browser, which in turn enables us to learn which advertisements bring users to our website. With both cookies and web beacon technology, the information that we collect and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address.

### **3. Information We Share**

We do not sell or otherwise disclose personal information about our website visitors, except as described here. We may share information provided by our visitors to <http://smftrust.com/> with service providers we have retained to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. In addition, we may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided through this website in a manner that is consistent with this Privacy Statement.

### **4. Links to Other Sites**

We may provide links to other websites for your convenience and information. These sites may have their own privacy statements in place, which we recommend you review if you visit any linked websites. We are not responsible for the content of linked sites or any use of the sites.

### **5. Children's Privacy**

This website is not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen on the site. If we become aware that we have inadvertently received personal information from a visitor under the age of thirteen on the site, we will delete the information from our records.

### **6. How We Protect Personal Information**

We maintain administrative, technical and physical safeguards to protect against unauthorized disclosure, use, alteration or destruction of the personal information you provide on this website.

### **7. Updates to Our Privacy Statement**

This Privacy Statement may be updated periodically and without prior notice to you to reflect changes in our online information practices. We will post a prominent notice on this website to notify you of any significant changes to our Privacy Statement and indicate at the bottom of the statement when it was most recently updated.

### **8. How to Contact Us**

If you have any questions or comments about this Privacy Policy, please contact us:

- Email at: [smftir@sretrust.com](mailto:smftir@sretrust.com)
- Phone at: 1-877-269-1031 or
- In Writing at:

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