



Stirlingshire

Better for Clients ♦ Better for Advisors

<https://stirlingshire.com>

<mailto:info@stirlingshire.com>

Stirlingshire BD LLC Privacy Policy Effective 5/27/2026

The following information contains the privacy policy of Stirlingshire BD LLC (“Stirlingshire”), a registered broker-dealer and member of FINRA and SIPC. This notice applies to our brokerage customers and to consumers who obtain or apply for our financial products or services for personal, family, or household purposes, as required by Regulation S-P. We provide this privacy policy when you become our customer and at least once every 12 months for as long as your customer relationship continues, unless the law allows us not to.

This privacy policy is designed to protect the confidentiality of current and former clients ('you') of Stirlingshire. Stirlingshire BD LLC is an introducing broker-dealer and provides brokerage services to retail and other clients through registered representatives and other channels. 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 Gramm-Leach-Bliley Act (15 U.S.C. 6801-6810) and Regulation S-P under the federal securities laws. The nonpublic personal information which identifies you and your account is hereafter referred to as “nonpublic personal information” or "NPI". 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 this document or other agreements, or as permitted or required by law (including to service providers that support your accounts). This does not include information willingly shared by a client via the app, website, or future platforms, including basic profile information and aggregated data; however, your underlying account records and other nonpublic personal information remain subject to this privacy policy.

We may disclose the nonpublic personal information described in this privacy policy to our affiliates and to nonaffiliated third parties, including custodians, clearing firms, technology and other service providers,

and, where permitted by law, other financial institutions, in order to process transactions, maintain your accounts, support our operations, and for other purposes permitted or required by law.

NON-PUBLIC PERSONAL INFORMATION COLLECTED

We collect nonpublic personal information about you from several sources, including information you provide on applications or other forms (such as your name, address, Social Security number, assets, income, and debt), information about your transactions and experiences with us (such as account balances, payment history, and trading or investment activity), information from nonaffiliated third parties in connection with servicing your accounts (such as custodians, clearing firms, and other service providers), and information from consumer-reporting agencies (such as your creditworthiness or credit history).

When you are no longer our customer, we may continue to share your nonpublic personal information as described in this privacy policy.

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 in accordance with applicable privacy policies and business practices and applicable law.

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. Where required by law, we will provide you with a notice and an opportunity to limit certain sharing of your nonpublic personal information, including instructions on how to exercise your choice (for example, by telephone, email, mail, or through our digital tools).

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 are reasonably designed 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.