



VZD Capital Management LLC
where clients come first

PRIVACY POLICY AND CODE OF ETHICS

VZD CAPITAL MANAGEMENT, LLC, an independent Registered Investment Advisory Firm, considers client privacy to be a fundamental aspect of our client relationships. We are committed to maintaining the confidentiality, integrity, and security of our current, prospective, and former client's personal information.

In the course of providing fee-based, investment management services, financial and business consulting, and customized workshops and seminars, we may collect, retain, and use client information for administering our operations, providing a high level of professional attention, monitoring and complying with legal and regulatory requirements. This information may come from sources such as account applications, investment advisory policy agreements, from your transactions, and other forms from other written, electronic or verbal correspondence from your brokerage, attorney, accountant or other advisors you may employ. We do not sell, exchange or disclose client information with outside organizations unless the third party is essential in administering our operations or except as required or permitted by law.

No confidential information, whatever the source, regarding any customer or client, may be disclosed except the following: We reserve the right to disclose or report personal information where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities. Adviser reserves the right to disclose information with other Adviser employees in connection with the Advisers' business and to non-affiliated third parties with whom the Adviser has a contractual agreement to offer jointly, endorse or sponsor a financial product or service; and to service and maintain customer accounts including effectuating a transaction. The adviser may disclose information about the client or client's account to a non-affiliated third party at the client's written request.

Finally, to further safeguard client information digitally, we maintain password-protected systems, updated anti-virus and anti-spyware software, and encrypted hardware and software firewalls.