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**PRIVACY POLICY**

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of VZD Capital Management, LLC. (“VZD”).

**Information We Collect:** In connection with providing investment advice, or other services, we obtain non-public personal information about you, including:

* Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets, and income;
* Information about your transactions with us, our affiliates, or others;
* Information about your visit to any store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the data electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user’s experience.
* Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

**Categories of Information We Disclose:** We may only disclose information that we collect in accordance with this policy. VZD does not sell customer lists and will not sell your name to telemarketers.

**Categories of Parties to Whom We Disclose:** We may only disclose information regarding you or your account at VZD, except under the following circumstances:

* To entities that perform service for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, other investment advisors;
* To comply with broker-dealer firms that have regulatory requirements to supervise individual representatives’ activities;
* To consumer reporting agencies,
* To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
* To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
* To our attorneys, accountants or auditors and

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* To government entities or other third parties in response to subpoenas or another legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants, and programmers, or companies that help us market products and services to you for some purposes, such as:

* **To protect your accounts/non-public information** from authorized access or identity theft;
* **To** **process your requests** such as securities purchases and sales;
* **To establish or maintain an account with an unaffiliated third party,** such as a clearing broker-dealer providing service to you and VZD;
* **To service your accounts,** such as by issuing checks and account statements;
* **To comply** with Federal, State, and Self-Regulatory Organization requirements;
* **To keep you informed** aboutfinancial services of interest to you.

**Our Service Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Cyber Security:** Internal policies and procedures are in place to address cybersecurity. A copy of this policy is available upon request.

**Succession Planning:** If the owner(s) of VZD retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party to facilitate a business succession plan. A change in control of ownership of VZD would require your consent, as dictated by your signed agreement with VZD, in order to continue providing services to you.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaints Notification:** Please direct complaints to Ethel J. Davis at VZD Capital Management, LLC, 6721 West 138th Terrace, Apt. 1711, Overland Park, KS 66209

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**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at VZD Capital Management, LLC, 6721 West 138th Terrace, Apt. 1711, Overland Park, KS 66209.

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