



### **AGREEMENT TO TERMS OF USE:**

These Terms and Conditions of Use (the “Terms of Use”) apply to the VZD Capital Management, LLC website at [www.vzdcap.com](http://www.vzdcap.com) and all associated sites linked to the firm. The site is the property of VZD Capital Management and its licensors.

BY USING THE SITE, YOU AGREE TO THESE TERMS OF USE; IF YOU DO NOT AGREE, DO NOT USE THE SITE.

At its sole discretion, VZD Capital Management, LLC reserves the right to change, modify, add, or remove a portion of these Terms of Use at any time. It is your responsibility to check these Terms of Use periodically for changes. Your continued use of the Site following the positioning of changes will mean that you accept and agree to the changes. As long as you comply with these Terms of Use, VZD Capital grants you a personal, non-exclusive, non-transferable, limited privilege to enter and use the Site.

### **CUSTOMER PRIVACY POLICY NOTICE:**

***Last Updated February 9, 2024***

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisory firms, to protect the privacy of customer information. Federal law gives clients the right to limit some but not all sharing of their personal information. When a financial institution discloses customer information to nonaffiliated third parties other than permitted or required by law, clients must be allowed to opt out or prevent such disclosure. VZD Capital Management, LLC does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

## **COMMITMENT TO YOUR PRIVATE INFORMATION**

VZD Capital Management is committed to safeguarding the confidential information of its clients. VZD Capital holds all personal information clients provide in the strictest confidence, and the firm's objective is to protect all clients' privacy. Except as permitted or required by law, VZD Capital does not share confidential information about clients with nonaffiliated parties. Suppose there was to be a change in this policy. In that case, the firm will provide clients with written notice, and clients will be provided an opportunity to direct VZD Capital Management as to whether such disclosure is permissible.

## **WHY WE COLLECT AND HOW WE USE INFORMATION**

To conduct regular business, VZD Capital Management, LLC collects personal information from sources such as:

- Information: the client reports on applications or other forms the client provides formations.
- Information about the client's transactions implemented by the firm or others.
- Information developed as part of financial plans, analysis, or investment advisory services.

To administer, manage, service, and provide related services for client accounts, VZD Management must give access to customer information within the firm and to nonaffiliated companies with whom the firm has entered into agreements. To provide the utmost service, we disclose the information below regarding clients and former clients, as necessary, to companies to perform certain services on our behalf.

- Information VZD Capital Management receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions.
- Information about a client's financial products and services transaction with VZD Capital Management.

## **SHARING INFORMATION WITH OTHER COMPANIES PERMITTED UNDER LAW**

Since VZD Capital Management shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's clients or former clients to anyone except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies, or other third parties, in response to subpoenas. VZD Capital Management does not jointly market with affiliated or nonaffiliated companies.

VZD Capital Management may share nonpublic information, including our custodian. Information is shared so that your account can be opened at the custodian and to enhance our service offering by consulting with our tax and legal collaborations, as necessary, to provide accurate and timely advice on your financial situation. We will collaborate with the client's legal and tax counselors with your written permission.

## **HOW WE PROTECT YOUR INFORMATION**

VZD Capital Management, LLC maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information, and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical, and physical safeguards.
- Security procedures for processing, storing, retaining, and disposing of confidential information.
- Programs to detect, prevent, and, when necessary, respond to attacks, intrusions, or unauthorized access to confidential information.
- Restricting access to customer information to employees who need to know that information to provide products and services to you and appointing specific employees to oversee our information security program.

## **CHILDREN**

Our website is not directed to children under the age of 18. Using our website, you represent and warrant that you are at least 18.

We respect children's privacy and do not knowingly collect or retain personally identifiable or nonpublic information from children under 18 through our website. However, we may process nonpublic information on a child's behalf with permission from the parent or guardian.

To the extent we have unintentionally collected any nonpublic information on our website from a person under 18 years old, you may request and obtain removal of this nonpublic information. To make such a request, please email a detailed description of the specific content or information to the email address below.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted. There may be circumstances in which the law does not require or allow removal, even if requested.

## **CHANGES TO THIS POLICY**

VZD Capital Management will provide each client with initial notice of the current Privacy Policy when the client relationship is established. Additionally, VZD Capital Management may occasionally amend this Privacy Policy at any time. Suppose we decide to use personal information in a manner that is materially different from that stated at the time it was collected. In that case, we will notify you of such changes before implementing them by posting a revised Privacy Policy with a new “Last Updated” date. VZD Capital Management shall provide each client with the current Privacy Policies at least annually.

We encourage you to check our website frequently to see when this Privacy Policy was last revised and to be informed of how we are committed to protecting your information.

## **ANY QUESTIONS**

If there are any questions regarding this Privacy Policy Notice, please use the Contact Us page to contact us via email or phone. Information requests must be made via VZD Capital Management’s Contact email – [info@vzdcap.com](mailto:info@vzdcap.com).