



# VZD CAPITAL MANAGEMENT

*where clients come first*

**OUR COMMITMENT TO YOUR PRIVACY: At VZD Capital Management, LLC, we prioritize your privacy to foster trust and peace of mind in our services.**

We prioritize our clients' privacy at VZD Capital Management, LLC (VZD or Advisor). It is our strict policy that any private client financial information we collect is not sold or shared with third parties, except in the following circumstances:

- Third parties, such as the client's custodian or other financial institutions, may be engaged by the Advisor to help manage or maintain client accounts. These third parties are bound by strict confidentiality agreements and are provided only with the information necessary to perform their duties.
- Client information may be disclosed to the client's accountants, legal representatives, and other third-party agents in writing upon the client's request.
- Applicable laws and regulations might disclose client information.

We will not share non-public personal information about our clients with nonaffiliated third parties without prior consent, except for specific reasons. These reasons include using third parties to help manage or maintain client accounts at the client's direction or as required by applicable laws and regulations. This notice explains how we collect, use, and protect client information.

## **HOW VZD CAPITAL INVESTMENT, LLC GATHERS INFORMATION:**

Regarding providing clients with investment management services, we may collect information about them from the following sources:

- Client agreement and other information that the client provides to us, whether in writing, in person, by telephone, electronically, or through any other means. This information may include a client's name, address, phone number, email address, social security number, employment details, income, investment experience, and other credit references.
- Personal and business tax returns submitted by the client.
- Transactions on a client's behalf. This information may include the client's account balances, positions, investment interests, and history, and
- Public sources
- To comply with federal, state, or local laws, rules, and other applicable legal requirements; and
- Under any other exceptions listed in the Kansas Information Privacy Act, such as when required by a court order or to prevent fraud.

We do not share non-public personal information about our clients with other companies that might want to sell you their products or services. For example, we do not sell client lists or client names to catalog companies.

## **OPT-OUT PROVISION:**

If you want to control how your personal information is shared at any time, VZD Capital Management LLC will notify you beforehand, allowing you to opt in or out.

Clients are advised that the Firm believes sharing client private information under the circumstances described above is either required by law or necessary for the Firm to operate and best serve client accounts. However, clients have

the right to opt out of third-party disclosures. If you wish to do so, contact the Firm immediately.

We will guide you through the process. Please note that opting out might require us to end our management agreement and help you transfer your account.

### **TO WHOM THIS POLICY APPLIES:**

This Privacy Policy applies to individuals who receive or have received services from VZD Capital Management, LLC, which are primarily used for personal, family, or household purposes.

### **OUR SECURITY PRACTICES AND INFORMATION ACCURACY:**

We apply robust security measures to safeguard your personal and account information, making sure you can trust us to keep your data protected.

Additionally, we have internal controls to ensure client information remains accurate and complete. Clients can access and review their personal data upon request. Please inform us if you believe any of your information is incorrect.

### **OTHER INFORMATION:**

We reserve the right to change this Statement of Privacy Policy. The examples within this Privacy Policy are illustrations and are not intended to be exclusive. Other information relevant to your privacy rights and our data handling practices includes our data retention policy, procedures for handling data breaches, and your rights under the Kansas Information Privacy Act. If you have any questions about our Privacy Policy, please get in touch with Ethel J. Davis, Chief Compliance Officer, at (816) 727-7066.

