



PRIVACY POLICY

FACTS

What does Vision Capital Management, Inc. do with your personal information?

WHY?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

WHAT?

The types of personal information we collect and share depend on the accounts or services you have with us. This information can include:

- o Social Security Number
- o Account Transactions
- o Assets and income
- o Risk tolerance and investment experience

When you are no longer our member, we continue to share your information as described in this notice.

HOW?

All financial companies need to share members' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Vision Capital Management, Inc. chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES VISION CAPITAL MANAGEMENT, INC. SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes – to offer our products and services to you.	No	We do not share
For joint marketing with other financial companies.	No	We do not share
For our affiliates’ everyday business purposes – information about your transactions and experiences.	No	We do not share
For our affiliates’ everyday business purposes – information about your creditworthiness.	No	We do not share
For our affiliates to market to you.	No	We do not share
For our non-affiliates to market to you.	No	We do not share

WHO WE ARE

Who is providing this notice?

Vision Capital Management, Inc.

WHAT WE DO

How does Vision Capital Management, Inc. protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings, procedural safeguards and safe record storage. We will continue to review and modify our security controls in the future to deal with changes in products, services, and technology.

We will never request personal information via unsolicited emails or pop-up windows, and we will only transmit such information in password-protected documents. We use network firewalls to enhance internet security.

How does Vision Capital Management, Inc. collect my personal information?

We collect your personal information, for example, when you:

- o give us your contact information or enter into an investment advisory contract
- o give us your income information or provide employment information
- o seek advice about your investments

We collect your personal information from others, including credit bureaus or other companies.

Why can't I limit all sharing?

Federal law only gives you the right to limit:

- o sharing for affiliates' everyday business purposes – information about your creditworthiness
- o affiliates from using your information to market to you
- o sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

DEFINITIONS

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies

o Vision Capital Management, Inc. does not have any affiliates

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

o Vision Capital Management, Inc. does not share with non-affiliates so they can market to you.

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our marketing partners include:

o Vision Capital Management, Inc. does not jointly market.