



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.

January 1, 2023



EU PRIVACY POLICY

FACTS

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

WHY?

Financial companies choose how they share your personal information. In accordance with the European Union's General Data Protection Regulation, Vision Capital Management, Inc. (VCMI) has created this EU Privacy Notice ("Privacy Notice") to inform you of your data rights and to outline how we collect, share, and protect your personal information. Please read this notice carefully to understand how VCMI handles your personal information. This policy applies to residents of the European Union.

WHAT?

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

- Social Security Number
- Account Transactions, balances, and history
- Assets and income
- Risk tolerance and investment experience

When you are no longer our client, we may continue to share your information to any third parties except as necessary to effect a transaction, maintain your account, in response to court orders and legal investigations, or otherwise permitted by law.

HOW?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Vision Capital Management, Inc. chooses to share; and whether you can limit this sharing. You may withdraw your consent to process your personal information at any time.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES VISION CAPITAL MANAGEMENT, INC. SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes – The recipients of personal information can include third party service providers. VCMi does not disclosure personal information about current or former clients to any third parties except as necessary to effect a transaction, maintain your account, in response to court orders and legal investigations, or otherwise permitted by law.	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 credit worthiness.	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.
Ian Boehme, Data Protection Officer

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. We use network firewalls to enhance internet security and transmit personal information through a secure portal. We limit third party access to non-public personal information only to those vendors that require the information in order to provide the service requested.

All new contracts involving the sharing of client personal and financial data are reviewed by the Data Protection Officer, or their designee to ensure adequacy.

Data breaches are communicated to supervisory authorities and affected clients within 72 hours of the breach being detected.

You will be asked to give consent prior to VCMI using your information for reasons other than what is outlined in this Privacy Notice.

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

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

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

We also 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:

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

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

What are my rights?

For a complete list of rights and regulations, please review **REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016**. The list below generally covers the fundamental rights and freedoms of EU resident data.

- Right to be informed about how and what personal data is being used and collected, which have been described in this Privacy Notice. Please contact VCMI's Data Protection Officer if you have any questions about how we handle specific data.
- Right of rectification of any inaccurate or incomplete personal information.
- Right to erasure, without delay, of any personal data that is no longer necessary in relation to the purposes for which they were collected or information to which you no longer grant VCMI consent to collect and process.
- Right to restrict or object of processing of personal data.
- Right to data portability. You may take your personal data to a third party at any time.

How long is my information retained?

Your information will be maintained, at a minimum, as long as is required by the applicable rules and regulations.

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

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