

## California Privacy Notice

This notice for California residents supplements the information contained in [Victory's Privacy Policy](#) and applies solely to consumers who reside in the State of California. This notice is intended to provide information required under the California Consumer Privacy Act of 2018 ("CCPA") and other California laws. Any terms defined in the CCPA or its implementing regulations have the same meaning when used in this notice. This notice applies to the data collection and processing practices of Victory Capital Management Inc.; Victory Capital Services, Inc.; Victory Capital Transfer Agency, Inc.; the Victory Funds and the USAA Mutual Funds (collectively, "Victory" or "we").

Please note that much of the Personal Information we collect about California residents is not covered by this Notice. The CCPA includes certain exemptions that may apply to our use or collection of your Personal Information and it is possible that not all Personal Information that we collect from you or about you is covered by the CCPA or this CCPA Privacy Notice. For example: Personal Information that is collected, processed or sold pursuant to the federal Gramm-Leach-Bliley Act ("GLBA") and implementing regulations is not covered by this Notice.

If you seek to or have obtained a financial product or service from Victory, please read [Victory's Privacy Policy](#), which explains the types of nonpublic personal information we collect from you and how we share it, consistent with federal privacy laws applicable to financial institutions, including the GLBA. This CCPA Privacy Notice and the rights granted hereunder do not apply to the information we collect from or about you pursuant to Victory's Privacy Policy; and personal information that we collect about you in a business-to-business context, including when you communicate with us as an employee of a business to whom we are providing a product or service, or receiving a product or service from, is not covered by this Notice.

## Contents

Information We Collect .....	2
Use of Personal Information .....	3
Sharing Personal Information .....	3
Your Rights as a California Resident.....	4
Access to Specific Information and Data Portability Rights .....	4
Deletion Request Rights.....	4
Exercising Access, Data Portability, and Deletion Rights.....	4
Response Timing and Format .....	5
Non-Discrimination.....	5

Changes to Our California Privacy Notice .....	5
Contact Information .....	5

## Information We Collect

There are eleven categories of personal information described in the CCPA. During the last twelve (12) months, we have collected personal information in the following categories from consumers, although we do not collect every specific piece of personal information for every consumer:

1. *Identifiers*: Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers
2. *Customer records information*: Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, health insurance information
3. *Characteristics of protected classifications under California or federal law*: Race, religion, sexual orientation, gender identity, gender expression, age
4. *Commercial information*: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
5. *Biometric information*: Hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data
6. *Internet or other electronic network activity information*: Browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement
7. *Geolocation data*
8. *Audio, electronic, visual, thermal, olfactory, or similar information*
9. *Professional or employment-related information*
10. *Education information*: Information that is not “publicly available personally identifiable information” as defined in the California Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)
11. *Inferences*: The law also includes inferences that could be used to create a profile reflecting a consumer’s:
  - a. Preferences
  - b. Characteristics
  - c. Psychological trends
  - d. Predispositions
  - e. Behavior
  - f. Attitudes
  - g. Intelligence
  - h. Abilities
  - i. Aptitudes

We collect personal information:

- Directly from our clients or their agents,
- Indirectly from our clients or their agents, in the course of the services that we provide,
- Directly and indirectly from activity on our website, and

- From third-parties that interact with us in connection with the services we perform.

What is not included in the definition of personal information?

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope.

## **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with the products and services that you request from us, including financial advice and other financial services.
- To provide you with emails or other communications concerning our products and services, including customer support.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To enhance your customer experience.
- To improve our products and services.
- To investigate and understand how our services are used, including through testing, research, analysis, and product development.
- To contact you to market our own products and services that we think might be of interest to you.
- To maintain your account in accordance with applicable U.S. federal and state laws.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To monitor and protect the security and integrity of Victory.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

## **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we seek to require the third-party recipient 1) not to disclose the information, except as permitted by you, 2) not to sell the information, and 3) not use the information for any purpose except the purposes described our agreement with the third-party recipient.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third parties:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Internet or other similar network activity
- Professional or employment-related information.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.

- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information. Victory does not sell, rent, or trade consumers' personal information.

## **Your Rights as a California Resident**

The CCPA provides California residents with specific rights regarding their personal information. This section describes consumers rights under the CCPA rights and explains how you can exercise those rights with Victory, if applicable.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (a "Request"). Once we confirm your Request, we will disclose to you, upon specific request:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

### **Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your Request, we will delete (and direct our service providers to delete) your personal information from our (and their) records, unless an exception applies.

Personal information that we collect and use to provide you with financial services, and which Victory is obligated by federal law and/or regulations to retain, cannot be deleted upon request.

We also may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Detect security incidents;
- Protect against malicious, deceptive, fraudulent, or illegal activity;
- Assist law enforcement in prosecuting those responsible for such activities; or
- Comply with a legal obligation.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise your rights described above, please submit a Request to us by:

- Email, at [privacy@vcm.com](mailto:privacy@vcm.com)
- By phone, at (877) 660-4400

Only you or an agent registered with the California Secretary of State who is authorized to act  
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on your behalf may make a Request.

You may only make two Requests within a 12-month period. Each Request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your Request with sufficient detail that allows us to properly evaluate and respond to it.

We will not respond to your Request or provide you with personal information if we are unable to verify your identity, or to verify the authority for the person making the request as your agent. We will use personal information provided in a verifiable consumer request to verify your identity or authority to make the request, and not for any other purpose.

### **Response Timing and Format**

We will acknowledge your Request within 10 days. We attempt to respond to every Request within 45 days. If we require more time, we will inform you of the reason and how much additional time we require (up to 90 days in total). Any disclosures we provide may only cover the 12-month period preceding the Request's receipt. If we are unable to satisfy your Request, or a part of your Request, we will explain why. We do not charge a fee to process or respond to Requests.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services.
- Charge you different prices for our services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of service.

### **Changes to Our California Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or by updating this notice on our brochure page.

### **Contact Information**

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us.

By email: [privacy@vcm.com](mailto:privacy@vcm.com)

By phone; +1 (877) 660-4400

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