



FACTS		WHAT DOES VICTORY CAPITAL DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share 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 personal information. Please read this notice carefully to understand what we do.		
What?	<p>The types of personal information we collect and share depend on the product and services you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number and investment experience</li> <li>• Account balance and transaction history</li> <li>• Assets and income</li> </ul>		
How?	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Victory Capital chooses to share, and whether you can limit this sharing.		
Reasons we can share your personal information	Does Victory Capital Share?	Can you limit the sharing?	
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts, and respond to court orders and legal investigations, or report to credit bureaus	Yes	No	
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No	
<b>For joint marketing with other financial companies</b>	No	We don't share	
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No	
<b>For our affiliates everyday purposes</b> - information about your credit worthiness	No	We don't share	
<b>To our affiliates to market to you</b>	No	We don't share	
<b>For nonaffiliates to market to you</b>	No	We don't share	
Questions?	Call 1-877-660-4400 or go to <a href="http://www.vcm.com">www.vcm.com</a>		

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Victory Capital Management Inc. and Victory Capital Advisers, Inc., together referred to as “Victory Capital”.
<b>What we do</b>	
<b>How does Victory Capital protect my personal information?</b>	To protect your information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Victory Capital collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• open an account or enter into an investment advisory contract</li> <li>• direct us to buy or sell securities</li> <li>• seek advice about your investment.</li> </ul> We also collect your personal information from other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Victory Capital Management Inc. and Victory Capital Advisers, Inc. are affiliates of one another because they are under indirect common control of Victory Capital Holdings, Inc.</i></li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• <i>Victory Capital does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• <i>Victory Capital does not jointly market.</i></li> </ul>
<b>Other Important Information</b>	
You may have other privacy protections under applicable state laws.	