Rev. 08/2026

FACTS	WHAT DOES VICTORY 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 product or service you have with us. This information can include: ■ Social Security number and income. ■ Account balances and account transactions. ■ Data from public sources and third-party data services.
How?	All financial companies need to share customers' personal information to run their everyday business as permitted by law. For example, we share with print and mail companies that assist us in sending mail. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Victory chooses to share and whether you can limit this sharing.

Reasons we can share your personal information	Does Victory share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your accounts, respond to court orders and legal investigations, or report to credit bureaus	**Yes**	**No**
For our marketing purposes — to offer products and services provided by Victory	**Yes**	**No**
For joint marketing — sharing with other financial companies to jointly market the other company's products or services	**No**	**We do not share**
For everyday business purposes of the Victory family of companies — this can include information about your Victory transactions and experiences	**Yes**	**No**
For everyday business purposes of the Victory family of companies — this can include information about your creditworthiness or insurability	**No**	**We do not share**
For non-Victory companies to market to you	**No**	**We do not share**

To limit our sharing	■ Visit us online: vcm.com/optout ■ Call (877) 660-4400 – our menu will prompt you through your choices. **Please note:** If you are a *new* customer, we can begin sharing this information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share and protect your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions?	Call your account representative or **(877) 660-4400** and ask to speak to a representative.

Who we are	
Who is providing this notice?	Victory Capital Holdings, Inc., and its family of companies, including companies identified with the Victory Capital name as described in the affiliates section below.

What we do	
How does Victory 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, buildings, and call authentication measures. When you interact by telephone with our customer support and service personnel, we may record your voice, voiceprint, and related data for quality control and security purposes. We do so to authenticate callers as legitimate customers and to secure your transactions and accounts with us.
How does Victory collect my personal information?	We collect your personal information, for example, when you: ■ Open an account or make deposits or withdrawals from your account. ■ Give us your contact or account information. ■ Direct us to buy or sell securities. We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: ■ Sharing among affiliated companies for everyday business purposes — information about your creditworthiness and insurability. ■ Affiliates from using your information to market to you. ■ Sharing for nonaffiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

Definitions	
Victory family of companies (affiliates)	Companies owned or controlled by Victory Capital Holdings, Inc. They can be financial and nonfinancial companies in the Victory family of companies. ■ The Victory family of companies includes: companies with a Victory Capital name, including without limitation Victory Capital Services, Inc., Victory Capital Transfer Agency, Inc., Victory Capital Management Inc. and its subsidiaries, RS Investments (UK) Limited, as well as pooled vehicles managed or administered by Victory Capital Management Inc., from time to time.
Non-Victory companies (nonaffiliates)	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ■ We only share with non-Victory companies to service transactions you request or as necessary to provide our services. ■ We do not share with non-Victory companies so they can market their products to you.
Joint Marketing	A formal agreement between a Victory company and a non-Victory financial company to market the non-Victory company's products or services to you. ■ We do not share with any non-Victory financial company for joint marketing.

Other important information
For Nevada Residents: Nevada law requires that we tell you about the option to be placed on our internal do-not-call list. If you'd rather not receive sales calls from us, please call **(877) 660-4400** and ask to speak to a representative so we can place you on our do-not-call list. You may also contact: Bureau of Consumer Protection Office of the Nevada Attorney General, 555 E. Washington Ave., Ste. 3900, Las Vegas, NV 89101, call 1-702-486-3132 or Email: BCPINFO@ag.state.nv.us. **For Vermont Residents:** In accordance with Vermont law, we will not share information we collect about you with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates as permitted by law. **For California Residents:** In accordance with California law, we will not share information we collect about you with nonaffiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.