

# FACTS

## WHAT DOES VICTORWEALTH DO WITH YOUR PERSONAL INFORMATION?

<b>How?</b>	All financial companies need to share customers' 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 VictorWealth chooses to share; and whether you can limit this sharing.
<b>Why?</b>	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.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Name and email address</li> <li>• Social Security number and income</li> <li>• Account numbers, account balances, and payment history</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this Notice.</p>

Reasons we can share your personal information	Does VictorWealth share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), 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 business purposes</b> — information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

Questions? Call toll-free 800-381-1053

Or go to [www.VictorWealth.com](http://www.VictorWealth.com)

## Who we are

**Who is providing this notice?**

This notice applies to VictorWealth. (VictorWealth is a DBA of Shenouda Capital Management LLC.

## What we do

**How does VictorWealth 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 and secured files and buildings.

**How does VictorWealth collect my personal information?**

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

- sign up for our services
- give us your information through our website

We also may get 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 for affiliates' everyday business purposes—information about your creditworthiness
- 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.

## Definitions

**Affiliates**

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

- Custodians include: TDAmeritrade, Charles Schwab, and Interactive Brokers

**Nonaffiliates**

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

- We don't share with nonaffiliates so they can market to you.

**Joint Marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- VictorWealth doesn't jointly market.