

Privacy Policy

Victory Road Advisors LLC

Effective: August 2023

Our Commitment to You

Victory Road Advisors LLC (“VRA”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. VRA (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does VRA provide such information to others except for discrete and proper business purposes in connection with the services we provide to you.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the Client information form required to become our Client. This information includes the following:

Name, address and phone number(s)	Date of Birth
Email address(es)	Assets and liabilities
Account information from other institutions	Income and expenses
Investment experience and goals	Investment activity

In addition, we collect non-public information about you from the following sources:

- Information we receive on Brokerage Statements, Managed Account Statements and other Subscription and Account Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, forms, investment questionnaires;
- Information about your transactions with others

Information about You That VRA Shares

VRA works to provide services that benefit our customers. We share non-public personal information with non-affiliated third parties (such as Nitrogen, our service provider) as necessary for us to provide agreed services to you consistent with applicable law. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy VRA’s regulatory obligations, and is otherwise required or permitted by law. Lastly, we will disclose your non-public personal information to companies we hire to help administer our business. Companies we hire to provide services of this kind are not permitted to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not sell your non-public personal information to anyone.

Information about Former Clients

VRA does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll keep you informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You can obtain a copy of our current privacy policy by contacting us at (617) 233-9586.