

# Vaughan Nelson Investment Management, L.P.

## PRIVACY POLICY STATEMENT

### **Overriding Principle**

Vaughan Nelson Investment Management, L.P., (“Vaughan Nelson”) has always considered the privacy and confidentiality of personal information received about you and/or your portfolio(s), obtained directly from you or from others in the performance of our services, to be paramount. You have entrusted Vaughan Nelson with your personal information, and Vaughan Nelson acknowledges that trust as a vital cornerstone in our relationship with you. Vaughan Nelson does not sell your personal information to anyone, nor do we share such information with non-affiliated third parties except when required by law, at your direction, or as noted below in order to provide our services.

Throughout this notice Vaughan Nelson will refer to non-public personally identifiable financial information as “personal information”.

### **Information We Collect and Communicate**

Vaughan Nelson collects and maintains personal information in order to effectively and efficiently provide our management services to you. The personal information covering present and former customers we receive is obtained from various sources that include:

- Information received from you on contracts, trading authorizations and oral and written correspondence in order to provide investment advice, such as your name, address, social security number, custodian, account numbers and assets;
- Information from transactions initiated by you or Vaughan Nelson on your behalf, such as trade amounts, brokers utilized, gains and losses and account activity;
- Information provided by third parties involved in the servicing of your portfolio, such as trade confirmations, broker account numbers, custodian information and periodic custodian statements

### **Sharing and Disclosing Personal Information to Service Providers**

Vaughan Nelson utilizes the personal information described above to administer your portfolios and provide you with the high level of client service you have come to expect. In order to provide this level of service Vaughan Nelson, in limited instances, discloses certain personal information to non-affiliated third parties, including:

- Financial service providers that perform services on our behalf such as proxy research, proxy voting, marketing and solicitation. These services are performed under contracts that prohibit the non-affiliated third party from using or disclosing the personal information provided by Vaughan Nelson other than to carry out the purposes for which Vaughan Nelson disclosed the personal information
- Other non-affiliated third party service providers necessary to service your account as permitted by law, such as brokers and your custodians

### **Affiliated and Affiliated Marketing**

Vaughan Nelson may disclose and share personal information that we collect on clients and former clients to affiliates within the family of companies owned by Natixis Global Asset Management, L.P. However, Vaughan Nelson does not share this personal information with our affiliates for purposes of “eligibility criteria” where our affiliate would use the information (i.e. creditworthiness, account history or personal identifiers) to identify individual(s) or types of individual(s) to receive a marketing solicitation from the affiliate.

### **Protection of Personal Information**

Vaughan Nelson takes our responsibility to protect the privacy and confidentiality of your personal information very seriously. Vaughan Nelson not only restricts the disclosure of your personal information to very limited instances, as described above, but maintains physical, electronic, and procedural safeguards that guard against unauthorized access, alteration and destruction. Vaughan Nelson also limits access to personal information to only those employees who require it in the performance of their job responsibilities.