



## CLIENT PRIVACY NOTICE

### **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. Vaughan Nelson does not “sell” (as defined under Federal law) your personal information to anyone, nor do we share such information with non-affiliated third parties except when permitted or required by law, at your direction, or as noted below in order to provide our services. To the extent you choose not to provide personal information, Vaughan Nelson may not be able to adequately manage your account.

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

### **Information We Collect and the Sources From Which We Collect It**

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 may include your name, address, social security number, account number and other personal information you or your representative provide to us in connection with our communications with you. We obtain this personal information from various sources such as:

- Information received from you on contracts, trading authorizations and oral and written correspondence in order to provide investment advice;
- As applicable, information your broker, financial firm or financial professional provides to us;
- Information from transactions initiated by you or Vaughan Nelson on your behalf;
- Information provided by third parties involved in the servicing of your portfolio.
- Our website.

### **Sharing and Disclosing Personal Information to Non-Affiliated Third Parties**

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 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, such as brokers and custodians, or to non-affiliated third parties as necessary to effect, administer, or enforce a transaction that you have requested or authorized or as required or permitted by law.

### **Affiliates 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 Investment Managers, L.P. However, Vaughan Nelson does not share this personal information with our affiliates for purposes of “eligibility criteria” (*i.e.*, creditworthiness, account history or personal identifiers) where our affiliate would use the information 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 as described above, but maintains physical, electronic, and procedural safeguards that guard against unauthorized access, alteration and destruction of your personal information. Vaughan Nelson retains your personal information for the length of time required by law or as may otherwise be permitted. Vaughan Nelson also limits access to personal information to only those employees who require it in the performance of their job responsibilities.

Questions/Concerns: If you have any questions or concerns about our privacy practices, please write to us at Vaughan Nelson, 600 Travis Street, Suite 3800, Houston, TX 77002-3071, call us at (888)-888-8676 or (713)-224-2545, or email us at [vncompliance@vaughannelson.com](mailto:vncompliance@vaughannelson.com).

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