



**Vulcan Value Partners, LLC
Privacy Notice**

Rev. October 2022

Vulcan Value Partners, LLC (“Vulcan”) obtains personal information from its clients which is treated as confidential and safeguarded under the firm’s Privacy Policy. Vulcan complies with SEC Regulation S-P (and any other applicable state or federal regulations), which requires that registered investment advisers adopt policies and procedures to protect the “nonpublic personal information” of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provide by Vulcan to clients, and data or analyses derived from such nonpublic personal information.

Information We Collect

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you, both in writing and orally; and
- Information about your transactions with us, or others such as your other investments or transaction history.

Information We Disclose and To Whom We Disclose It

We do not disclose any nonpublic personal information about our clients or former clients without your express consent or as permitted by law. We may disclose all of the information we collect to persons or companies that perform services on our behalf so that they may perform those services.

Our Security Procedures

We restrict access to nonpublic personal information and only allow disclosures to persons and companies as permitted by law to assist in providing services to you. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

Changes to this Privacy Policy

We reserve the right to change this privacy policy in the future, but we will not disclose your nonpublic personal information except as otherwise required or permitted by law without giving you an opportunity to instruct us not to do so. **Please check <https://vulcanvaluepartners.com/disclosures/> from time to time for any updates, as this Privacy Notice will be updated periodically.**

Other Important Information

To request further information, please contact clientservice@vulcanvaluepartners.com.