

Privacy Notice

Guiding Principles

The relationship between Snyder Capital Management, L.P. (“SCM”) and its clients is the most important asset of the firm. SCM strives to maintain a client’s trust and confidence in the firm, an essential aspect of which is its commitment to protecting personal information to the best of its ability. SCM will not disclose a client’s personal information to anyone unless it is required by law, at the client’s direction, or is permitted by law and necessary to provide the client with SCM’s services. SCM has not and will not sell a client’s personal information to anyone.

The Personal Information We Collect and Communicate

SCM collects and maintains a client’s personal information so it can provide investment services to the client. The types and categories of information collected include:

- Information received on applications and other forms to open an account or provide investment advice such as a client’s name, home or business address, tax identification number, telephone number, and financial information;
- Information that SCM generates to service the client’s account such as reporting and transaction information;
- Information SCM receives from third parties with respect to the client’s account or about their transactions, such as trade confirmations and statements from brokerage firms.

To provide investment management services, SCM may disclose a client’s personal information that is collected, as described above, in order to process client transactions, maintain the account(s), and respond to court orders and legal investigations as required or permitted by law.

How We Protect Personal Information

To fulfill SCM’s privacy commitment, SCM has instituted firm-wide practices to safeguard the information we maintain about the client. These include:

- Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep personal information safe;
- Limiting access of personal information to those employees who need it to perform their job duties;
- Requiring third parties that perform services for SCM to agree to keep a client’s information strictly confidential;
- Protecting information of SCM’s former clients to the same extent as its current clients.