

Privacy Notice



FACTS: WHAT DOES NEWFLEET ASSET MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?

WHY? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

WHAT? The types of personal information we collect and share depend on the product or service you have with us.

This information can include:

- Investment Experience
- Assets
- Risk Tolerance
- Account Balances
- Wire Transfer Instructions

When you are no longer our customer, we continue to share your information as described in this notice.

HOW? All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Newfleet Asset Management ("Newfleet") chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION

	DOES NEWFLEET SHARE?	CAN YOU LIMIT SHARING?
For our everyday business purposes Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes To offer our products and services to you	NO	WE DON'T SHARE
For joint marketing with other financial companies	NO	WE DON'T SHARE
For our affiliates' everyday business purposes Information about your transactions and experiences	YES	NO
For our affiliates' everyday business purposes Information about your creditworthiness	NO	WE DON'T SHARE
For nonaffiliates to market to you	NO	WE DON'T SHARE

QUESTIONS? Call (877) 332-8172 or go to www.Newfleet.com

Privacy Notice Cont.

WHAT WE DO

How does Newfleet protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does Newfleet collect my personal information?

We collect your personal information, for example, when you:

- Open an account;
- Make a wire transfer;
- Give us your contact information;
- Seek advice about your investments;
- Enter into an investment advisory contract.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- Sharing for affiliates' everyday business purposes
 - information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

DEFINITIONS

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies.

Newfleet does share with our affiliates.

Our affiliates include financial companies such as Virtus Investment Partners, Inc., LLC.; Duff & Phelps Investment Management Co.; Kayne Anderson Rudnick Investment Management, LLC; Rampart Investment Management Company, LLC.; Virtus Alternative Investment Advisers, Inc.; Virtus Fund Services, LLC.; Euclid Advisors LLC; Zweig Advisers LLC.; Virtus Investment Advisers, Inc.; Virtus Retirement Investment Advisers LLC.; Virtus ETF Advisers LLC.; VP Distributors and ETF Distributors.

Non-Affiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

Newfleet does not share with non-affiliates so they can market to you.

Joint Marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Newfleet does not jointly market.

