### Why?
Protecting your privacy is important to Manning & Napier. We consider your account information and data to be private and confidential, and we endeavor to hold ourselves to the highest standards of trust and fiduciary responsibility. This policy covers Personal Information, which means non-public personal information about you and your relationship with Manning & Napier. This policy also applies to our former customers.

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:

- Social Security Number
- Income
- Assets
- Address
- Occupation
- Investment Objectives

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 customer’s personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons Manning & Napier chooses to share; and whether you can limit this sharing.

Through the normal course of business and to better service your account, we share transaction and experience information, as well as other general information, such as account balances, monthly statements, payment history and securities positions among Manning & Napier. For example, Manning & Napier may disclose personal Information to enable it and its affiliates to process transactions you request. Manning & Napier may disclose certain information to third-party service providers used in connection with servicing your account(s). Such third-party service providers are subject to the laws of the jurisdiction in which they reside, domestic or foreign, and may share information with their affiliates, subsidiaries and other third parties exclusively to provide the services for which they were retained or as otherwise permitted under applicable law.

<table>
<thead>
<tr>
<th>Reasons we can share your personal information</th>
<th>Does Manning &amp; Napier share?</th>
<th>Can you limit this sharing?</th>
</tr>
</thead>
<tbody>
<tr>
<td>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</td>
<td>Yes</td>
<td>We do not disclose any Personal Information about our customers or former customers to anyone, including non-affiliated third parties, except as permitted or required by law (including, for instance, tax reporting to the IRS or pursuant to a court order or subpoena) and to third party service providers as discussed herein.</td>
</tr>
<tr>
<td>For our marketing purposes—to offer products and services to you or to other clients and prospects</td>
<td>Yes</td>
<td>Manning &amp; Napier and its affiliates may disclose nonpublic personal information about you to non-affiliated third party service providers that perform marketing or other services on our behalf. In those instances, Manning &amp; Napier and the third party service provider enter into a contractual agreement under which the third party service provider is prohibited from disclosing or using your information other than to perform the services for which they were hired or as otherwise permitted under applicable law. Manning &amp; Napier may disclose nonpublic information to its affiliates in order for Manning &amp; Napier to market its affiliates’ products and services to you.</td>
</tr>
<tr>
<td>For joint marketing with other financial companies</td>
<td>Yes</td>
<td>Manning &amp; Napier and its affiliates may disclose Personal Information such as account balances, monthly statements, payment history and securities positions to non-affiliated third parties with which we have joint marketing arrangements (for instance, a personal financial advisor with whom we work in connection with active client accounts) and only with your consent. All of these non-affiliated third parties are contractually obligated to keep the information that we provide to them confidential and to use the information only to provide the services we’ve asked them to perform for you and us.</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes—information about your transactions and experiences</td>
<td>Yes</td>
<td>Manning &amp; Napier may also share Personal Information with affiliates in order for Manning &amp; Napier to better serve your financial needs and to offer you additional products and services. Manning &amp; Napier’s affiliates will not use nonpublic information received from Manning &amp; Napier to market directly to you.</td>
</tr>
<tr>
<td>For our affiliates’ everyday business purposes—information about your creditworthiness</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>For our affiliates to market to you</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>For non-affiliates to market to you</td>
<td>No</td>
<td>N/A</td>
</tr>
</tbody>
</table>
## Who we are

**Who is providing this**

## What we do

### How does Manning & Napier protect my personal information?

Keeping financial information secure is one of our most important responsibilities. To protect your Personal Information, we maintain physical, electronic, and procedural safeguards that comply with federal standards. We limit access to Personal Information to our service providers and employees who use that information to provide products and services to you or to maintain or service those products or services. Our employees are bound by a Client Confidentiality policy and are subject to disciplinary action if they fail to follow this policy.

### How does Manning & Napier collect my personal information?

Personal Information we collect comes from the following sources:
1. Information we receive from you on applications and through other means, such as your name, address, occupation, assets, income, and investment objectives;
2. Information about your transactions with us, our affiliates, or others, such as securities purchases and sales, withdrawals, and account transfers.

We do not collect consumer report information.

### 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 non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

## Definitions

### Affiliates

Financial or non-financial Companies related by common ownership or control.

### Non-affiliates

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

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

## Other important information

We strive to maintain accurate information about you and your accounts. If you believe that our records contain inaccurate information about you, please call or write to us immediately. We will promptly update or correct any erroneous information under our control.

Manning & Napier will provide you with an amended notice of our privacy policy in the event of a material change, including a change that requires Manning & Napier to provide you with opt-out rights.

## Questions?

Call (585) 325 - 6880 or go to www.manning-napier.com