

## Privacy Policy

Privacy Notice	
<b>FACTS</b>	WHAT DOES KAYNE ANDERSON RUDNICK INVESTMENT MANAGEMENT, LLC DO WITH YOUR PERSONAL INFORMATION?
<b>WHY?</b>	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.
<b>WHAT?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security Number and investment experience</li> <li>• Account balances and assets</li> <li>• Risk tolerance and transaction history</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
<b>HOW?</b>	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 Kayne Anderson Rudnick Investment Management, LLC (Kayne Anderson Rudnick) chooses to share; and whether you can limit this sharing.

Reasons We Can Share Your Personal Information	Does Kayne Anderson Rudnick Share?	Can You Limit This Sharing
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	No	We do not share
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your creditworthiness	No	We do not share
<b>For non-affiliates to market to you</b>	No	We do not share

Questions? Call +1-800-231-7414 or e-mail [Compliance@kayne.com](mailto:Compliance@kayne.com)

## Who We Are

Who is providing this notice? Kayne Anderson Rudnick Investment Management, LLC (Kayne Anderson Rudnick)

## What We Do

How does Kayne Anderson Rudnick 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 Kayne Anderson Rudnick collect my personal information?

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

- Open an account
- Seek advice about your investments
- Enter into an investment advisory contract
- Tell us about your investment or retirement portfolio
- Give us your contact 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

## Definitions

Affiliates

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

- Our affiliates include financial companies such as Virtus Investment Partners, Inc., Duff & Phelps Investment Management Co., Virtus Investment Advisers, Inc., Newfleet Asset Management, Inc., VP Distributors, LLC, Rampart Investment Management Company, LLC, Virtus Alternative Investment Advisers, Inc., Virtus ETF Advisers, LLC, , Silvant Capital Managenemt LLC, Ceredex Value Advisors LLC, SEIX CLO Management LLC and SEIX Investment Advisors LLC., Sustainable Growth Advisers LP; Virtus Fund Advisers, LLC

Non-affiliates

Kayne Anderson Rudnick does not share with non-affiliates so they can market to you.

Joint Marketing

Kayne Anderson Rudnick does not jointly market.

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## For California Residents Only

In addition to our Privacy Policy, the below notice is provided solely to **California residents** who are clients of Kayne Anderson Rudnick.

The California Consumer Privacy Act ("CCPA") gives you the right to know what personal information we intend to collect or have collected about you and why. For clients of Kayne Anderson Rudnick, this information was explained in our **Privacy Notice**, above.

The CCPA also provides you the right to request access to specific pieces of information we have collected from you. You also have the right to request that we delete personal information about you, however, we may not be able to delete personal information if we are required to retain this information for legal or ongoing business purposes. You may contact our Compliance Department at 1-800-231-7414 or by e-mailing [Compliance@kayne.com](mailto:Compliance@kayne.com) if you wish to make such a request.

If we do not delete certain items of personal information because we have a legal right or obligation to retain that information, we will notify you of that. Further, if we do not delete certain items of personal information because we have a legal right or obligation to retain that data, we will delete that information at such later time that we no longer have a legal right or obligation to retain that information upon such a request.

We are not required under CCPA to provide information to you about our collection of your personal information or our sale or disclosure of personal information about you more than twice within a 12-month period. Additionally, we are permitted to refuse to honor unfounded or excessive repetitive requests to us or charge a reasonable administrative fee for honoring those requests, and in either case, will notify you of any such decision.

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