Apogem Capital
BY NEW YORK LIFE INVESTMENT MANAGEMENT

FACTS WHAT DOES APOGEM CAPITAL 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 note that this privacy notice applies only to individuals who receive or have received a financial product or service from us mainly for personal, family or household purposes. It does not apply to institutions. 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: • Name, address, birth date, social security number, income and household information. • Information about your account balances and financial transactions with us, such as types of products you purchased, account status, or trading history. • Information gathered from our websites, such as through online forms, site visit data and information collection devices ("cookies"). • Information from outside sources, such as public information. • Information collected from consumer reporting agencies.
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 Apogem Capital chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Apogem Capital share?	Can you limit this 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	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For affiliates to market to you	No	We do not share
For nonaffiliates to market to you	The	We do not share

Questions?	Apogem Capital LLC	(212) 601-3600

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Who we are	
Who is providing this notice?	Apogem Capital is a wholly owned subsidiary of New York Life Investment Management ("NYLIM"), which in turn is a wholly owned subsidiary of New York Life Insurance Company ("NYLIC"). NYLIM is both a service mark, and the common trade name, of certain investment advisors affiliated with NYLIC. The products and services of NYLIM's boutiques are not available to all clients and in all jurisdictions or regions. New York Life Investment Management includes the following: **Apogem Capital LLC** **NYLIM Funds** **MacKay Shields LLC** **NYL Investors LLC** **New York Life Investment Management LLC**

What we do	
How does Apogem Capital protect my personal information?	We maintain physical, electronic, and procedural safeguards that meet state and federal regulations. Access to customer information is limited to people who need the information to perform their job responsibilities. We regularly update and improve our security standards, procedures, and technology to protect against unauthorized access to your information.
How does Apogem Capital collect my personal information?	We collect your personal information, for example, when you • Open an account • Conduct transactions in your account, such as trades, deposits or withdrawals • Provide us your income information • Show us your government-issued ID for verification purposes • Provide account 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 nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • *Our affiliates include companies listed on the New York Life Family of Companies.**
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • *New York Life Investment Management does not share with nonaffiliates for marketing purposes.*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • *New York Life Investment Management does not jointly market.*

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***The New York Life Family of Companies currently includes the following insurance and financial service affiliates and funds:**

New York Life Insurance Company
New York Life Insurance and Annuity Corporation
New York Life Investment Management LLC
New York Life Enterprises LLC
New York Life Group Insurance Company of NY
New York Life Investment Management Asia Limited
New York Life Trust Company
Andera Partners
Apogem Capital LLC
Apogem Evergreen Fund
Ausbil Investment Management Limited
Candriam S.C.A.
Eagle Strategies LLC
Flatiron RR LLC, Manager Series
Kartesia Management SA
Life Insurance Company of North America
MacKay Shields LLC
NYLIM Active ETF Trust
NYLIM CBRE Global Infrastructure Megatrends Term Fund NYLIM ETF Trust
NYLIM Funds Trust
NYLIM MacKay Defined Term Municipal Opportunities Fund NYLIM MacKay Muni Opportunities Fund
NYLIM VP Funds Trust NYL Investors LLC NYLIFE Distributors LLC
NYLIFE Insurance Company of Arizona NYLIFE Securities LLC
NYLIM Service Company LLC
NYLINK Insurance Agencies, Inc. NYL Investments Europe Limited NYL Investments UK LLP
Tristan Capital Partners

For more information about our privacy practices, please visit https://apogemcapital.com/privacy-and-cookies/.

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