

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
- Address
- Assets
- Income
- 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, Personal Information may be disclosed to our affiliates to enable them to process transactions you request. In addition, third-party service providers, who are used in connection with Manning & Napier providing its services, may also receive information.

Manning & Napier may share Personal Information among its affiliates to better serve your financial needs. For example, Personal Information may be shared so that we may offer you additional products or services from Manning & Napier.

Reasons we can share your personal information	Does Manning & Napier 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	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 above.
For our marketing purposes— to offer our products and services to you	Yes	Additional products and services from affiliates would not be offered independently by any such affiliate.
For joint marketing with other financial companies	Yes	We 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.
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	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.
For our affiliates' everyday business purposes— information about your creditworthiness	No	N/A
For non-affiliates to market to you	No	N/A

Questions?

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

Who we are

Who is providing this	Manning & Napier*
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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?	<p>Personal Information we collect comes from the following sources:</p> <ol style="list-style-type: none"> 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. <p>We do not collect consumer report information.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • 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 <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • Affiliates of Manning & Napier include: Manning & Napier Advisors, LLC, Manning & Napier Advisory Advantage Company, LLC, Exeter Advisors, LLC, Manning & Napier Alternative Opportunities, LLC, Manning & Napier Investor Services, Inc., Manning & Napier Fund, Inc., Exeter Trust Company
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p>

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 notice of our privacy policy annually, as long as you maintain an ongoing relationship with us.

*Manning & Napier Advisors, LLC, Manning & Napier Advisory Advantage Company, LLC, Exeter Advisors, LLC, Manning & Napier Alternative Opportunities, LLC, Manning & Napier Investor Services, Inc., Manning & Napier Fund, Inc., Exeter Trust Company