

FACTS

WHAT DOES NEW YORK LIFE INVESTMENT 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 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 New York Life Investment Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does New York Life Investment Management 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	No	We do not share

Questions?

Apogem Capital LLC	(212) 601-3614
MacKay Shields LLC	(212) 758-5400
NYLI M Funds	(800) 624-6782
New York Life Investment Management LLC	(888) 474-7725
NYL Investors LLC	(212) 576-7915



Who we are

Who is providing this notice?

"New York Life Investment Management" is both a service mark, and the common trade name, of certain investment advisors affiliated with New York Life Insurance Company. The products and services of New York Life Investment Management'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 New York Life Investment Management 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 New York Life Investment Management 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.*

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.*

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

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