VIRTUS FINANCIAL PARTNERS, LLC
PRIVACY NOTICE

Regulation S-P | 17 CFR Part 248

Effective Date: May 17, 2026 | This notice replaces the Privacy Policy dated February 13, 2024

Virtus Financial Partners, LLC ("Virtus," "we," "our," or "the firm") is an investment adviser registered with the U.S. Securities and Exchange Commission. We are committed to safeguarding the nonpublic personal information of our clients. This Privacy Notice describes the categories of information we collect, how we use and protect that information, and when and to whom we may disclose it. It is provided to you in accordance with Regulation S-P, 17 CFR Part 248, as amended.

1. Information We Collect

In the course of providing investment advisory services, we collect nonpublic personal information ("NPI") about you from the following sources:

- **Information you provide to us:** Name, address, telephone number, email address, date of birth, Social Security number, tax identification number, employer and dental practice information, financial goals, risk tolerance, family and beneficiary information, and other information you share through onboarding forms, financial planning questionnaires, and ongoing communications.
- **Information from your transactions with us or others:** Account balances, positions, and transaction history at your custodian; held-away account information (401(k), HSA, and other employer-sponsored plan data); billing and fee information; and trading activity.
- **Information from third parties:** Custodial account data from Charles Schwab; held-away account data from Pontera and Future Capital; performance and reporting data from Black Diamond; and, with your authorization, tax return data and other documents you provide for planning purposes.
- **Information from consumer reporting agencies:** We do not routinely obtain consumer reports. If a consumer report is obtained for any purpose, we will provide separate notice as required by applicable law.

2. Information We Disclose

We do not sell your personal information. We do not share your nonpublic personal information with nonaffiliated third parties except as permitted or required by law. Specifically, we may disclose your information only in the following circumstances:

A. To Service Providers Performing Services on Our Behalf

We share information with companies that provide services necessary for us to conduct our business and serve your accounts. These service providers include our custodian, portfolio reporting platform, held-away account management platforms, electronic signature provider, customer relationship management system, document storage provider, email and productivity platform, and task management system. We require each service provider to protect the confidentiality of your information and to use it only for the purpose for which it was disclosed.

These disclosures are made in accordance with the exceptions in 17 CFR 248.14 and 248.15 (processing and servicing transactions you request or authorize, maintaining or servicing your account, and other activities permitted by law).

B. As Permitted or Required by Law

We may disclose your information as necessary to comply with legal or regulatory requirements, respond to court orders or subpoenas, cooperate with regulatory examinations or investigations, or protect against fraud. These disclosures are made in accordance with the exceptions in 17 CFR 248.15.

C. With Your Consent

We may disclose your information to other parties when you direct us to do so or provide your written authorization. For example, if you ask us to coordinate with your accountant, attorney, or other professional advisor, we will share the information necessary to carry out your request.

We do not disclose your nonpublic personal information to nonaffiliated third parties for marketing purposes.

Affiliates: Virtus Financial Partners, LLC has no affiliated companies. We do not share your information with affiliates.

3. Your Right to Opt Out

Because we do not share your nonpublic personal information with nonaffiliated third parties other than as described in Section 2 above (and all such disclosures fall within the regulatory exceptions), you are not required to opt out, and we do not provide an opt-out mechanism. If our information-sharing practices change in the future, we will deliver an updated Privacy Notice and provide you with the opportunity to opt out before any new sharing occurs.

4. Former Clients

If you are a former client of Virtus Financial Partners, we will continue to protect your nonpublic personal information in accordance with this Privacy Notice. We do not disclose the information of former clients to nonaffiliated third parties except as described in Section 2 above.

5. How We Protect Your Information

We maintain administrative, technical, and physical safeguards designed to protect your nonpublic personal information against unauthorized access, use, disclosure, alteration, or destruction. Our safeguards include:

- Access controls that limit access to your information to authorized personnel with a legitimate business need.
- Multi-factor authentication on all platforms that store or process your information.
- Encryption of your information both in transit (using current transport layer security protocols) and at rest (using encryption technologies employed by our service providers and on our local devices).
- Physical safeguards for paper records and portable media, including locked storage and secure disposal through cross-cut shredding or electronic wiping.
- Ongoing monitoring and periodic review of our security practices, including annual risk assessments and security configuration reviews.
- Written policies and procedures for responding to security incidents and data breaches (see Section 6 below).
- Oversight of our service providers, including written commitments from each service provider to take appropriate measures to protect your information and to notify us promptly of any security breach.

These safeguards are described in detail in our Written Information Security Program, which is reviewed and updated at least annually.

6. Breach Notification

In accordance with the 2024 amendments to Regulation S-P, if we become aware that your sensitive personal information has been, or is reasonably likely to have been, accessed or used without authorization, we will notify you as soon as practicable, and in no event later than 30 days after we become aware of the breach. Our notification will include:

- A description of the incident.
- The type of information that was or may have been compromised.
- Contact information for the firm so you can reach us with questions.
- Contact information for the Federal Trade Commission and, if applicable, your state attorney general.
- Recommendations for steps you can take to protect yourself, including information about your right to obtain free credit reports and to place security freezes or fraud alerts with the three nationwide consumer reporting agencies (Equifax, Experian, and TransUnion).
- Information about any protective measures we are offering, such as credit monitoring, if applicable.

Our Incident Response Program and Breach Notification Procedures describe these obligations in detail.

7. Our Service Providers

The following table identifies the categories of service providers with which we share your information and the purpose of each disclosure. Each of these service providers is subject to our service provider oversight procedures, including a written commitment to protect your information and to notify us within 72 hours of any security breach.

Category	Service Provider(s)	Purpose of Disclosure
Custodian	Charles Schwab	Account opening, trade execution, custody of assets, account reporting, money movement
Held-away account management	Pontera; Future Capital	Management of employer-sponsored retirement plans (401(k), 403(b), HSA) and other held-away accounts at your direction
Portfolio reporting	Black Diamond (SS&C)	Performance reporting, account aggregation, and portfolio analytics
Electronic signature	DocuSign	Electronic execution and storage of account agreements, planning documents, and authorizations
Customer relationship management	Salesforce	Client recordkeeping, relationship management, meeting and planning notes, and service tracking
Document storage	Box.com	Secure storage of client documents, agreements, planning deliverables, and compliance records
Email and productivity	Microsoft 365	Client communications, document collaboration, and calendar management
Task management	Asana	Internal workflow and task tracking related to client service delivery

8. Your Rights

You have the right to:

- Receive this Privacy Notice at the time you establish a customer relationship with us.
- Receive an updated Privacy Notice whenever we make a material change to our information-sharing policies or practices.
- Be notified if your sensitive personal information is compromised in a security breach, as described in Section 6 above.
- Request information about the categories of personal information we have collected about you and how it has been used and disclosed, to the extent required by applicable state law.

If you have questions about your rights or this Privacy Notice, please contact us using the information below.

9. Changes to This Notice

We reserve the right to modify this Privacy Notice at any time. If we make material changes to our information-sharing policies or practices, we will deliver an updated Privacy Notice to you before implementing the changes. As long as our policies and practices remain as described in this notice and we continue to share information only within the regulatory exceptions described in Section 2, we will not be required to deliver this notice annually.

10. How to Contact Us

If you have questions about this Privacy Notice or our privacy practices, please contact:

Stan Stewart

Founding Partner and Chief Compliance Officer

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