VIRTUS
FINANCIAL PARTNERS

REGULATION S-P · 17 CFR PART 248

Privacy Notice

Virtus Financial Partners, LLC
130 W. Lake Sue Avenue, Winter Park, FL 32789
(407) 267-8445 · www.virtusfinancialpartners.com

Effective November 13, 2026

Effective Date: November 13, 2026 · This notice replaces the Privacy Notice dated October 30, 2026.

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 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); education savings account information (529 plan account data, contributions, and investment selections); 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; education savings account data from 529 plan program administrators (including my529 and American Funds CollegeAmerica 529); and, with your authorization, tax return data and other documents you provide for planning purposes.
- **Information from your communications with us:** Records and content of your communications with us, including emails, text messages sent through our approved business texting platform, and notes, recordings, or transcripts of meetings and calls created using meeting-assistance tools.

- **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, a sub-advisory portfolio manager, electronic signature provider, customer relationship management system, document storage provider, email and productivity platform, task management system, financial planning software, fee billing and payment processor, online scheduling tool, client email and communications platform, managed information technology provider, business text-messaging platform, video-meeting and meeting recording and transcription tools, an email-security provider, a workflow-automation tool, an artificial-intelligence assistant used for compliance, research, supervisory review of firm communications, and client service, a voice-dictation tool, and a website host. 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. We also send information to the education savings plan program administrators for your 529 accounts, only at your direction (Section 7).

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) and, where neither of those exceptions applies, under 17 CFR 248.13.

Service provider statement. Where we disclose information to a service provider under 17 CFR 248.13, the categories of information we disclose are the categories described in Section 1, which can include sensitive information such as Social Security numbers, dates of birth and account numbers where the service requires it. The categories of third parties with

whom we have contracted are the service-provider categories listed in this Section and in Section 7.

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 ask you to sign our written authorization and will then share the information you authorize.

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 in transit between our systems and those of our custodian and service providers (using current transport layer security protocols) and at rest (using encryption technologies employed by our service providers and on our local devices). Sensitive information, such as a Social Security number, a full account number, or a date of birth together with your name, is emailed only in encrypted form or collected through a secure upload. Other information, such as meeting details, balances and planning notes, may be sent to you by regular email, and a few limited items, such as appointment details or the last four digits of an account number, by text message. Regular email and text messages may not be encrypted all the way to your device.
- 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 through due diligence and monitoring. We require each service provider, by contract or otherwise, to protect your information, and we ask each to commit to notify us of a security breach within 72 hours. Where a provider has not made that commitment (for example, our custodian, which is itself subject to Regulation S-P), we record the exception and the other safeguards we rely on.

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 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 that unauthorized access to or use of client information has occurred or is reasonably likely to have occurred. We do not send this notice if, after a reasonable investigation, we determine that your sensitive information has not been, and is not reasonably likely to be, used in a way that would result in substantial harm or inconvenience to you. Notice may be delayed only if the U.S. Attorney General asks for a delay for national security or public safety. If the unauthorized access happened only at your custodian, for example through your own login there, your custodian, which is itself subject to Regulation S-P, is responsible for that notice. Our notification will include:

- A description of the incident.
- The type of information that was or may have been compromised.
- The date, estimated date or date range of the incident, if it can reasonably be determined.
- A recommendation that you review your account statements and report any suspicious activity to us.
- 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 program, described in Section 5, except the education savings plan program administrators in the last row. They receive your information only at your direction, to carry out the 529 plan transactions you request, and they protect it under their own legal duties. We review those relationships each year.

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
Sub-advisory portfolio management	Smartleaf Asset Management	Trading and rebalancing of your accounts, including tax-loss-harvesting management where selected, under Virtus's 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, video messages we record for you, and compliance records
Email and productivity	Microsoft 365	Client communications, calendar management, and firm email archiving for compliance recordkeeping
Task management and client portal	Asana	Workflow and task tracking related to client service delivery, including a client portal that we may invite you to use
Financial planning software	eMoney Advisor (Fidelity)	Financial planning, account aggregation, and goal modeling, and secure storage of documents you upload to the eMoney Vault
Risk analysis and proposals	Nitrogen	Risk tolerance assessment and investment proposal generation
Fee billing and payments	AdvicePay	Advisory fee invoicing and payment processing
Online scheduling	OnceHub	Scheduling client meetings and appointments
Client communications and email distribution	Constant Contact	Distribution of firm newsletters, client communications, and educational content (firm communications, not third-party marketing)

Category	Service Provider(s)	Purpose of Disclosure
Managed information technology	PulseOne	Technology support and administration of firm systems that store or process client information
Business text messaging	ClerkChat	Sending and archiving text-message communications with clients through the firm's approved business texting platform
Meeting recording and transcription	Fathom	Recording and transcribing client meetings to create notes and summaries
Video meetings	Zoom	Hosting live client video meetings (not recorded)
Email security	Barracuda	Filtering and securing inbound and outbound firm email, which may contain client information in transit
Workflow automation	Zapier	Automating routine workflows between firm systems, which may transmit client information between connected applications
Artificial-intelligence assistant	Anthropic (Claude)	AI assistant for compliance, research, drafting, supervisory review of firm communications, and client service; may process client information in firm files and communications, including Social Security and account numbers, under contractual terms that prohibit training on firm data
Voice dictation	Wispr Flow	Turning staff dictation into text for emails, documents and notes. It may hear a client's name and other details staff dictate, but our policies bar sensitive information, such as a Social Security or full account number. Our policies require it to be set so that it keeps no audio or text
Website hosting	Webflow	Hosting the firm's public website, including contact and inquiry details submitted by prospective clients through web forms
Education savings plan program administrators	my529 (Utah); American Funds CollegeAmerica 529	Account opening, contributions, investment option selection, beneficiary designation, and distribution processing for 529 education savings plans at your direction

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. We deliver this Privacy Notice to all clients 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

Virtus Financial Partners, LLC, 130 W. Lake Sue Avenue, Winter Park, FL 32789

407.267.8445

sstewart@virtusfp.com

virtusfinancialpartners.com

Acknowledgment of Receipt

This page is signed when the Privacy Notice is handed to a client in person, and may be used when it is mailed, to document the client's receipt.

I acknowledge that I have received a copy of the Privacy Notice of Virtus Financial Partners, LLC, effective November 13, 2026.

Client Name (Printed): _____

Client Signature: _____

Date: _____