

PRIVACY NOTICE

FACTS

WHAT DOES MACKAY SHIELDS LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

The Privacy Notice is being provided by MacKay Shields LLC and the private funds for which it serves as investment adviser (collectively “we”, “us” or “our”). 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 MacKay chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does MacKay 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?

Please contact the Chief Compliance Officer of MacKay Shields LLC at Compliance-DB@mackayshields.com, at (212) 758-5400, or by writing to MacKay Shields LLC, 299 Park Avenue, New York, NY 10171, with any questions about this Privacy Notice or requests with regards to your personal data that we hold.

Who we are

Who is providing this notice?	<p>MacKay Shields LLC is part of New York Life Investments, which 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 Investments' boutiques are not available to all clients and in all jurisdictions or regions.</p> <p>New York Life Investments includes the following:</p> <p>Apogem Capital LLC NYLI Funds MacKay Shields LLC NYL Investors LLC New York Life Investment Management LLC</p>
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What we do

How does MacKay Shields LLC protect my personal information?	<p>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.</p>
How does MacKay Shields LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account, or invest or apply to invest in our private funds • 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?	<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 nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Our affiliates include companies listed on the New York Life Family of Companies.*</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>New York Life Investments does not share with nonaffiliates for marketing purposes.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>New York Life Investments does not jointly market.</i>

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

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