



Internet Privacy Policy

We value our relationships with our customers, financial advisors and strategic partners. We are committed to providing site users with public information as well as a secure and confidential environment for you to access your own (and, in the case of financial advisors, your clients') personal account information. We do not sell information about you. When we collect personal information online, we do so to help us and your advisor serve your financial needs.

This Internet Privacy Policy refers to the content on www.virtus.com.

We are not responsible for the content or information practices of any third-party Web sites to which our site refers or links. We urge you to read their policies regarding their privacy practices.

Personal Login

Certain segments of this site require a personal login to customize your experience and provide you information that is appropriate to your relationship with Virtus Investment Partners. Dependent on where you are on our site, we may collect some personal information (e.g., name, Social Security number, account number, e-mail address, postal address, company and phone number), about you to facilitate requested communications or facilitate transactions. We will assign you a user name, and you will be asked to create your own password. If you forget your user name and/or password, you may request assistance through the site or by contacting a customer service representative at 1-800-243-1574.

E-mail Opt Out

We have requested your e-mail address when you registered for access to certain parts of our Web site reserved for financial advisors and customers of Virtus Investment Partners. If we ever send you information by e-mail concerning new products or sites, we will provide you with an e-mail address or a link to a Web page so that you may request no future notices.

Cookies

"Cookies" are pieces of information that are placed on an individual's computer hard drive to enable the individual to more easily communicate and interact with a Web site. This site may use cookies to customize your experience on our site. We will not collect any personally identifiable data via cookies.

Information We Collect On Our Site

As you browse the Internet, a trail of electronic information is left at each Web site you visit. This information, sometimes called "clickstream" data, can be collected and stored by a Web site's server. Clickstream data can tell us the type of computer and browsing software you use, the address of the Web site from which you linked to the site and, in some instances, your email address. We may use clickstream data to determine what sections of our site you visit, how much time you spend on each page of our site and how you navigate throughout the site.

This information may be correlated to your login account and studied to make changes to the Web site that Phoenix believes will provide value to site users. We will use aggregated site usage data within our organization to optimize site construction and usability.

How We Use Information

In the normal course of business, we may share personal information, including information obtained from this Web site, with persons or entities involved in servicing and administering products and services on your behalf, including your agent, broker or financial advisor.

We may use information you provide to the site to make you aware of other Virtus products and customize your site experience, but we will not share information with or sell information to unaffiliated third parties except as stated above. Before we disclose your information to any non-affiliated third party, those entities with whom we share it must agree to maintain the privacy of your information.

As is common in the financial services industry, we may use certain third-party transaction processing service providers to process customer account transactions. Some of the secure transaction areas of our site are hosted by these third parties. When you submit certain transaction requests online, these third parties will collect your personal account information (e.g., name, account number, Social Security number) to fulfill your request and/or process your transaction.

Procedures to Protect Confidentiality and Security of Personal Information

We have procedures in place that limit access to personal information to only those employees, representatives and service providers who need to access it in order to perform business services or market products on behalf of Virtus Investment Partners and our affiliates. We educate our employees on the importance of protecting the privacy and security of confidential personal information. We also maintain physical, electronic and procedural safeguards that comply with federal and state regulations to guard your personal information.

Correcting/Updating Your Information

Financial advisors: You may [contact us](#) online or call 1-800-243-4301 to change or review the information we maintain about you and your business with Virtus Investment Partners.

Individual investors and shareholders: If you have a concern about your personal or account information maintained by us, or want to correct, update, or confirm your information, please [contact us](#) online or call a service representative at 1-800-243-1574 between 8AM and 6PM (ET) Monday through Thursday or until 5PM (ET) on Friday.

Consent to Processing

By providing any personal information to the site, users, including without limitation users in the European Union, fully understand and unambiguously consent to the collection and processing of such information in the United States.

E-mail on the Internet

E-mail sent on the Internet should not be considered entirely secure even if you are using a secure email program. We ask that you not send any confidential information to Virtus Investment Partners via e-mail. If you do want to send us a secure and confidential message, log onto your account and use the form provided. When you use a form on the Web site to send a message to Virtus, we will not reference any personally identifiable information in any emails we send to you.

Changes to This Policy

We may change our Internet Privacy Policy from time to time. We suggest that you check these terms periodically for changes.

Effective Date: October 1, 2008