



## PRIVACY NOTICE

The Securities and Exchange Commission (SEC) was required by the Gramm-Leach-Bliley Act to establish standards to safeguard client information and records. As a result, the SEC adopted Regulation S-P, which among other things, requires investment advisors registered with the SEC to adopt appropriate policies and procedures that address safeguards to protect this information and to disclose its privacy policies to clients. MCF Advisors LLC (“MCF”) has always taken great measures to protect and safeguard information we gather on our clients. As a financial company, we can choose if or how we 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 read this notice carefully to understand what we do.

### Types of Information Collected

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, phone number, Social Security Number, date of birth, account numbers, tax documents, income, employment and residential information, cash balances, security balances, other investments, investment objectives, net worth, insurance policies, and medical history; and
- Information about your transactions with us or with your custodian(s), such as buys, sells, gains, losses, fees, and/or holdings. Such information may be obtained from paper statements or via electronic download directly from your custodian.

MCF’s web servers collect domain names and/or IP addresses of users to measure what pages and features are accessed by our visitors. This information helps us administer the site, improve content and gather broad demographic information for aggregate use.

MCF may use “cookies” or similar files or scripts throughout its website to enhance your convenience in using our websites, to improve search functionality or to hold information that you would otherwise need to re-key. “Cookies” are text files collected by a user’s web browser. If you do not wish to accept “cookies” from our website, you may configure your web browser so that it does not accept “cookies”; however, you may lose certain functions available on our website.

### Affiliations

MCF Advisors, LLC d/b/a MCF Institutional, d/b/a MCF Private Investments, and d/b/a MCF (collectively herein referred to as “MCF”), is a wholly owned subsidiary of MCF Financial Holdings, LLC. MCF and its licensed insurance agents have a business arrangement with Lion Street, Inc., an insurance broker that facilitates the placement of insurance policies for MCF clients. MCF has a negligible interest in Lion Street’s parent company, Integrity Marketing Group, Inc. Employees of MCF are also licensed attorneys who practice law through an outside business activity with an unaffiliated entity, MCF Legal PLLC (“MCF Legal”). Any investment advisory services provided by these individuals as part of MCF are consultative in nature and should not be construed as legal advice. MCF does not hold itself out as a law firm or as an entity providing legal advice. MCF



Clients are under no obligation to purchase legal services through MCF Legal, and any business arrangement between an MCF Client and MCF Legal will be established by a separate written agreement.

### **How We Collect, Use, and Share Information**

As part of providing advisory services, we collect personal information directly from clients and prospective clients, including contact information such as name, email address, mailing address, and telephone number.

We use this information to:

- Provide advisory and client service communications
- Respond to inquiries
- Schedule and confirm appointments
- Send account-related notifications
- Maintain required books and records
- Comply with legal and regulatory obligations
- We do not sell nonpublic personal information to third parties.

We may share personal information with:

- Service providers that assist us in delivering advisory and operational services (subject to confidentiality obligations)
- Regulatory authorities, as required by law
- Other parties as permitted or required under applicable securities laws

We do not sell your personal information to anyone. We do not share your information for joint marketing with other financial companies or share information about your transactions and experiences or information about your creditworthiness for our affiliates' everyday business purposes. We do not share your information so our affiliates or non-affiliates can market to you.

We do not disclose or share nonpublic personal information about you to third parties, unless one of the following limited exceptions applies or you have specifically asked us to do so:

- We disclose personal information to companies that help us process or service your transactions or account(s) and perform our advisory services (such as custodians, tax and accounting firms, estate planning attorneys, or others, as applicable).
- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities.

MCF restricts access to your personal and account information to those employees who need to know that information in order to provide services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

### **Text Messaging**

If you elect to receive SMS communications from us, please review our **SMS Terms & Conditions** for important information about message frequency, opt-out rights, and carrier disclosures.



We do not sell, rent, or share mobile opt-in data, SMS consent information, or phone numbers collected for SMS communications with third parties or affiliates for marketing purposes

### **Emergency Contact**

From time to time due to unforeseen circumstances relating to the physical or mental health of a client, the best financial interests of the client may be served if MCF is able to communicate regarding the client with another individual. If the client has provided MCF with a properly executed copy of the client's power of attorney or named an individual as a Trusted Contact with a custodian, MCF may contact the client's attorney-in-fact or authorized individual, if MCF reasonably believes doing so is in the best interest of the client. If the client's attorney-in-fact or authorized individual is unavailable, MCF may communicate with a responsible family member MCF reasonably believes is an appropriate person with whom to communicate under the circumstances.

### **Sharing Practices Notification**

We must provide you with a copy of this statement which details our sharing practices when you initially open an account and each year while you are a customer.

### **Changes to Privacy Policy**

In the future, MCF may offer new and different programs that necessitate a change in this Policy. MCF may update this Privacy Notice from time to time. When required by applicable law, MCF will provide clients with a revised notice describing any material changes to our privacy practices.

### **Governing Law and Jurisdiction**

This Policy, and MCF's collection and use of customer information, shall be governed and interpreted in accordance with the laws of the United States and the State of Kentucky. Any disputes arising out of this Policy shall be adjudicated in a court located in the County of Kenton, State of Kentucky.

### **Phishing Scams**

If you receive an email purporting to be from MCF that asks you to provide personal or account information, or login and passwords, do not provide such information unless you have first verified that the website or email is from MCF. Such emails may be fraudulent and used in connection with scams known as phishing. MCF asks that you report any suspicious emails or websites to MCF.

### **Disposal of Information**

MCF has taken steps to reasonably ensure that the privacy of your nonpublic personal information is maintained at all times, including in connection with the disposal of information that is no longer required to be maintained. Such steps shall include whenever possible, shredding paper documents and records prior to disposal and erasing and/or obliterating any data contained on electronic media in such a manner that the information can no longer be read or reconstructed.



## Right to Limit Sharing

Federal law gives you the right to limit sharing only for:

- affiliates' everyday business purposes—information about your creditworthiness (we do not share)
- affiliates to market to you (we do not share)
- non-affiliates to market to you (we do not share)

State laws and individual companies may give you additional rights to limit sharing.

## Contact and Modifying Personal Information

If you should ever decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice. Should you have any questions about the privacy and protection of your records, please contact us and we will be happy to discuss this matter with you. You may request copies of or have MCF make changes or corrections to personal information in MCF's possession by contacting MCF at [clientservices@mcfadvisors.com](mailto:clientservices@mcfadvisors.com). You may opt out of receiving further communications from us or others through any of the following methods:

- Send a request by mail to: Marketing, MCF Advisors LLC, 333 West Vine Street, 12<sup>th</sup> Floor, Lexington, KY 40507.
- Call: 859.392.8600

**Please note that you cannot opt out of receiving any notifications or disclosures that we are required by Federal or State law to provide to you.**

## Definitions

- *Everyday Business Purposes*: The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you.
- *Affiliates Companies*: Companies related by common ownership or control. They can be financial and nonfinancial companies.
- *Non-Affiliates*: Companies not related by common ownership or control. They can be financial and nonfinancial companies.
- *Joint Marketing*: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

## Data Security

### We're Here to Help

Data security, cybercrime and identity theft are growing concerns for all of us. MCF is dedicated to helping ensure your information is safe and secure. If you ever have security-related concerns, please do not hesitate to call us. We will work closely with you to ensure a rapid and personal response to your concerns. If you are the victim of fraud or identity theft, please contact your MCF advisor or client service representative immediately.

## Our Role in Protecting Your Data

MCF understands that you have entrusted us with vital personal information. We want you to know that we take our responsibility to protect your information extremely seriously. MCF regularly reviews and evaluates both its privacy and security policies and adapts them as necessary to deal with the constantly changing data security landscape. We remain current with the regulatory requirements surrounding privacy laws and make changes as appropriate. We protect our computing systems and data through a multi-layered security approach that is built on industry best practices and we regularly provide employee training and policy oversight.

## Our Custodian Partners Role

We also work closely with our custodial partners to remain up to date and closely aligned with their policies, procedures and practices. We encourage you to visit their websites for additional information about the ways they also protect your information.

- **Charles Schwab**  
([http://www.schwab.com/public/schwab/nn/legal\\_compliance/schwabsafe](http://www.schwab.com/public/schwab/nn/legal_compliance/schwabsafe))
- **Fidelity** (<https://www.fidelity.com/security/customer-protection-guarantee>)

## Your Role

Your participation is an important component of all of our security efforts. We believe it is essential that we work in close cooperation with you as our client to maintain the highest levels of security. Below are some helpful websites to learn ways to help protect your information.

- **Federal Trade Commission – ID Theft** (<https://consumer.ftc.gov/identity-theft-online-security>)
- **Federal Trade Commission – Phishing** (<https://www.consumer.ftc.gov/articles/0003-phishing>)
- **Federal Trade Commission – Statement of Rights** (<https://www.identitytheft.gov/Know-Your-Rights>)
- **Identity Theft Resource Center** (<http://www.idtheftcenter.org/>)
- **Social Security Administration** (<https://oig.ssa.gov/>)
- **Federal Deposit Insurance Corporation (FDIC)** (<https://www.fdic.gov/>)
- **Postal Inspection Service** (<https://www.uspis.gov/>)

## Contact Us

If you ever have security-related concerns, please do not hesitate to call us at 859.392.8600.

*Please note: These links are being provided for your convenience and for informational purposes only. MCF is not affiliated with any of these organizations, does not endorse any products or services provided by them and we do not guarantee the accuracy, effectiveness and/or completeness of their information.*



## **SMS Terms & Conditions**

### **1. SMS Consent Communication**

Phone numbers obtained as part of the SMS consent process will not be shared with third parties or affiliates for marketing purposes.

By sharing your mobile phone number with MCF and opting in, you consent to receive SMS (text) messages from MCF Advisors, LLC, (“MCF”) a Registered Investment Adviser (“Firm,” “we,” “us,” or “our”).

SMS consent is not a condition of purchasing any services.

### **2. Types of SMS Communications**

If you have consented to receive text messages from MCF, you may receive messages related to appointment reminders, and important account-related services and notifications.

### **3. Message Frequency**

Message frequency may vary depending on your relationship with us and the nature of your engagement.

### **4. Potential Fees for SMS Messaging**

Standard message and data rates may apply, depending on your mobile carrier’s pricing plan. Charges may vary if messages are sent domestically or internationally.

MCF is not responsible for carrier-imposed charges.

### **5. Opt-In Methods**

You may opt in to receive SMS messages from MCF in one or more of the following ways:

- Via text message reply (e.g., replying “YES” to an enrollment or consent request message from MCF)

Your consent is documented and retained in accordance with our recordkeeping policies.

### **6. Opt-Out Method**

You may opt out of receiving SMS messages at any time. To opt out:

- Reply “**STOP**” to any SMS message you receive from us.

After you send “STOP,” you will receive a confirmation message and will no longer receive SMS communications unless you re-enroll.

To opt back into receiving SMS messages at any time reply “**START**”.

### **7. Help & Support**

If you are experiencing any issues, you can reply with the keyword “**HELP**”. Or, you can get help directly from us at:

- Phone: (859) 967-0999
- Email: [Ops@mcfadvisors.com](mailto:Ops@mcfadvisors.com)



## **8. Data Privacy**

We respect your privacy. Information collected as part of the SMS consent process, including phone numbers, will be used solely for the purposes described above.

Mobile opt-in data will not be shared, sold, rented, or disclosed to third parties or affiliates for marketing purposes.

For more information, please review our Privacy Notice at: [Privacy Notice](#)

## **9. Security Notice**

SMS messaging is not a secure method of communication. Please do not transmit sensitive personal information (e.g., Social Security numbers, account numbers, or financial details) via text message.

For secure communications, please contact our office directly.

## **10. Changes to These Terms**

We may update these SMS Terms & Conditions from time to time. Updates will be posted on our website with a revised effective date.

Your continued participation in our SMS program constitutes acceptance of those changes.