



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 and d/b/a MCF (collectively herein referred to as “MCF”), is owned by MCF employees. MCF and its licensed insurance agents have an affiliation with Lion Street, Inc., an insurance broker that facilitates the placement of insurance policies for our clients. MCF has a negligible interest in Lion Street’s parent company, Integrity Marketing Group, Inc.

Use of Personal Information

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) (such as Fidelity, Schwab, 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.

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, MCF may contact the client's attorney-in-fact, if MCF reasonably believes doing so is in the best interest of the client. If the client's attorney-in-fact 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 reserves the right to change its privacy policy at any time without prior notice. Any changes to the privacy policy will be posted on our website under the Privacy section and will be effective immediately upon posting.

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

MCF does not send emails to customers requesting billing, login or password information. 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. You may opt out of receiving further communications from us or others through any of the following methods:

- Send an email to clientservices@mcfadvisors.com
- Send a request by mail to: Marketing, MCF Advisors LLC, 333 West Vine Street, Suite 1740, 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)
- **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://www.consumer.ftc.gov/topics/identity-theft>)
- **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/fraud-reporting/what-is-fraud-waste-abuse/>)
- **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.