

DUNCAN FINANCIAL MANAGEMENT, INC.

PRIVACY NOTICE (Revised 3/27/2020)

At Duncan Financial Management, Inc. (referred to as “DFM”), we deliver this Privacy Notice to you initially upon engagement and annually thereafter. If we change or update this policy, the “revised date” at the top of this notice will also be updated. Protecting our client’s privacy is a priority, and we believe it is important that you understand our uses of the information we gather from you.

Information That May Be Gathered

In performing our services for you, we may collect the following non-public personal information about you:

- Personal information for account applications and forms that may contain your name, address, telephone number, email address, date of birth, social security number and employment information. We use this information to render services to you.
- Information we may receive from you in our conversations, discussions and interviews, such as your personal background/financial situation, investment objectives, tax information/returns, investment holdings, account balances and account numbers.
- Information you deliver to us in written or other format.
- Information prepared by and delivered by third parties acting on your behalf.

Information We May Disclose

Please be advised that except as stated in this notice and permitted by law, we do not disclose any non-public personal information about you to anyone.

- Although we are not currently required to file certain reports with the U.S. Department of Treasury’s Financial Crimes Enforcement Network (“FinCEN”), we have voluntarily decided to assist law enforcement by adopting procedures to detect suspicious activity and potentially make certain reports to FinCEN. Therefore, we may disclose non-public information about you to FinCEN or other government agencies.
- We may disclose some of the information that we collect to non-affiliated companies that provide financial services such as custodians or broker-dealers, banks, FMO’s and insurance companies/agencies.
- We may disclose information to companies that provide service to us including legal and accounting professionals, companies that maintain software for DFM, and provide technical support for our hardware or software.
- You agree to permit us to consult with and to provide financial information to your attorney, accountant, tax preparer, insurance agent, broker-dealer, investment adviser, account custodian, to the extent necessary to help provide service to you.

Securing Your Information

It is the policy of DFM to restrict access of all current and former clients’ non-public personal information to those employees and nonaffiliated entities who need to know that information in order to provide products or services to you.

DFM permits only authorized employees and affiliates who have signed a copy of DFM’s Privacy Policy to have access to client information. Employees violating DFM’s Privacy Policy will be subject to DFM’s disciplinary process. Additionally, whenever DFM hires other organizations to provide services to DFM’s clients, DFM will require them to sign confidentiality agreements and/or provide a Privacy Policy of their own.

DFM maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' non-public personal information. These measures include industry standard computer safeguards, secure files, and secure building access. Through this policy and its underlying procedures, DFM attempts to secure the confidentiality of client records and information and protect against anticipated threats or hazards to the security or integrity of client records and information.

DFM's Privacy Policy remains in effect at all times, even if the client relationship is terminated.

Right to Opt Out

DFM does not currently disclose non-public personal information of its clients to nonaffiliated third parties except as described above. If in the future this policy changes, you will be notified and given the opportunity to opt out of having this information shared.

Questions?

Should you have any questions regarding this Privacy Notice, please contact Stacey Cheek, Chief Compliance Officer, at 314-835-1111.