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| <b>FACTS</b>       | <b>What Does SD Financial Pathways, LLC, Do With Your Personal Information?</b>  |
| <b>The Law</b>     | 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 read this notice carefully to understand what we do.   |
| <b>Our Policy</b>  | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Income</li> <li>• Employment and residential information</li> <li>• Social security number</li> <li>• Cash balance</li> <li>• Security balances</li> <li>• Transaction detail history</li> <li>• Investment objectives, goals, and risk tolerance</li> </ul> <p>When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p> |
| <b>Your Rights</b> | All financial companies need to share clients' personal information to run their everyday business. We list below the reasons financial companies can share their clients' personal information; the reasons SD Financial Pathways chooses to share; and whether you can limit this sharing.   |

| <b>Definitions</b>         |  |
|----------------------------|--|
| Everyday Business Purposes | The actions necessary by financial companies to run their business and manage client accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you. |
| Affiliates                 | Companies related by common ownership or control. They can be financial and nonfinancial companies. SD Financial Pathways does not have any affiliates.  |
| Non-Affiliates             | Companies not related by common ownership or control. They can be financial and nonfinancial companies. SD Financial Pathways does not share information with non-affiliates for marketing purposes.   |
| Joint Marketing            | A formal agreement between non-affiliated financial companies that together market financial products or services to you. SD Financial Pathways does not engage in joint marketing with non-affiliates.  |

| Reasons we can share your personal information  | Does SD Financial Pathways share?           | Can you limit this sharing? |
|---|---|-----------------------------|
| For our everyday business purposes—such as to provide advice, process your transactions, and maintain your account(s) | 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                    | No  | We do not share             |
| For our affiliates' everyday business purposes—information about your creditworthiness                                | No  | We do not share             |
| For our affiliates to market to you   | No  | We do not share             |
| For non-affiliates to market to you   | No  | We do not share             |
| <b>Contact Us</b>   | Call SD Financial Pathways at 248-244-8900. |                             |

| Sharing Practices   |   |
|---|---|
| How often does SD Financial Pathways notify me about their practices? | We must notify you about our sharing practices when you open an account and each year while you are a client.   |
| How does SD Financial Pathways protect my personal information?       | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.   |
| How does SD Financial Pathways collect my personal information?       | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• establish an investment advisory relationship</li> <li>• contract for financial planning services</li> <li>• open an account or deposit money with custodians</li> <li>• purchase or sell securities with executing broker-dealers</li> </ul> <p>We also collect your personal information from others, such as custodians, broker-dealers, or other companies.</p> |
| Why can't I limit all sharing?  | <p>Federal law gives you the right to limit sharing only for</p> <ul style="list-style-type: none"> <li>• affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates to market to you</li> <li>• non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>   |

## Additional Disclosures

If you would like a copy of SD Financial Pathway's Form ADV Part 2A and 2B, please send a written request to:

SD Financial Pathways, LLC  
4 Parklane Blvd., Suite 320  
Dearborn, MI 48126

If you wish to modify or impose reasonable restrictions concerning the management of your account or if your financial situation, investment objectives, or risk tolerance have changed, please contact your SD Financial Pathways investment advisor representative or contact Steven Deceuninck at 248-244-8900.

We will contact you at least annually to determine if your investment goals, objectives, and risk tolerance have changed.

We urge you to advise us immediately if you have not received your custodian or brokerage statement, which is required to be delivered to you no less frequently than quarterly. In addition, please compare any account information provided by us with account statements from your broker-dealer or custodian and to advise us of any discrepancies. The official record of your account is maintained by your broker-dealer or custodian.