AI & Technology Use Disclosure

Technology, analytics, and AI-assisted workflows.

Effective October 21, 2026 - Version Date October 21, 2026

Protocol Wealth uses software, analytics, automation, and AI-assisted tools to support research, drafting, data organization, portfolio analysis, operational workflows, cybersecurity, educational content, and firm operations. This disclosure supplements the Client Advisory Agreement, Privacy Policy, Form ADV Part 2A, and Terms of Service.

Human Fiduciary Responsibility

Protocol Wealth does not delegate fiduciary responsibility to AI systems. A human adviser remains responsible for client-facing advice, recommendations, supervision, and final judgment. AI-assisted output may contain errors, omissions, bias, stale information, incomplete context, or unsupported assumptions and is not used as the sole basis for advisory decisions.

Client-Facing Content and Recommendations

Client-facing recommendations and regulated publications remain the responsibility of Protocol Wealth personnel. AI tools do not approve client recommendations, open accounts, determine suitability, execute trades, transfer assets, or alter client mandates without human authorization and applicable operational controls.

Client Portal Assistant

The AI assistant in the client portal is a limited beta. Its answers are not reviewed by an adviser first and can be wrong. It answers a client’s questions about the client’s own accounts, balances, transactions and risk profile, can do illustrative planning calculations, and can pass a planning note to the advisory team. It does not give investment, tax or financial advice, trade, move money, or change accounts.

Values Read From Your Documents

When you or your adviser place a statement or K-1 for an outside investment in the document folder we set up with you for outside investments, AI reads values from it: the investment’s name, type, value and as-of date, and other figures the document reports. These values may appear to you before an adviser reviews them. Each one is labeled "Unverified" until an adviser confirms or corrects it.

We use the latest statement. A K-1 figure appears only as a fallback, labeled "K-1 capital account (tax basis)" with its as-of date, and it is never shown as a market value. Where your estimated value includes unverified values, the amount is shown beneath it.

No returns or performance are calculated from these values, and no advice accompanies them. Choosing whether these values appear in your view changes only what you see. It does not change fee billing or statements. Documents are read on a zero-data-retention path. Account numbers, tax identification numbers, addresses and phone numbers are replaced where our scanner recognizes

them before any AI model sees the text; names printed on the document are not.

Data Handling

Protocol Wealth applies data-minimization controls when using technology providers. Client PII, credentials, private keys, seed phrases, account numbers, Social Security numbers, and other sensitive data must not be submitted to public AI tools that are not authorized for that use. Where AI or automation tools are used, Protocol Wealth seeks appropriate enterprise, security, retention, vendor, and supervisory controls.

Automation and Trading

Technology may help generate research, alerts, workflows, or proposed actions. Any discretionary trading or operational authority must come from the signed advisory agreement, account documents, custodian permissions, and applicable policy controls. Automated or autonomous execution outside client mandates and applicable controls is prohibited.

Governance and Controls

Protocol Wealth governs AI use through written policies and periodic review. AI calls are recorded in an append-only log - what was asked, by whom, when - and AI-assisted work is sampled for human review, with review coverage tracked. Its policy requires de-identification of client data before AI processing where feasible, and it contracts with AI providers on terms restricting the use of client data.

Both our core audit log and our AI-interaction log reject edits and deletes at the database level. Neither is hash-chained today, so the log is protected against alteration but not yet independently tamper-evident. One thing this deliberately does not claim: the review layer surfaces work for people to check rather than detecting bias automatically - the control is human review, not an algorithm.

What Redaction Does and Does Not Cover

Before a message you send to the client assistant is sent onward, the system replaces identifiers it can detect by pattern with placeholders. Email addresses, US phone numbers, Social Security numbers, payment-card numbers and street addresses are reliably replaced.

Detection is by pattern, so it is not complete. Account numbers are caught only when written in certain formats - "account #48213377" is replaced, "my account number is 48213377" is not. Phone numbers outside US formats are not replaced. Do not rely on it for anything you would not want sent.

People’s names are never replaced. There is no reliable way to detect a name by pattern, so a name you type - your own, or a family member’s, a beneficiary’s or a professional’s - is sent as written.

What you type is kept as you typed it. Your conversations are retained as firm books and records under Advisers Act Rule 204-2, and the stored record is the message as written; redaction applies to what is sent to the AI provider, not to what is retained. Your adviser can see your conversation titles and messages as part of reviewing your planning context, and those views are logged.

This is why the assistant asks you to work in summaries rather than pasting account numbers or documents, and why it is worth using initials or a relationship ("my spouse", "my daughter") rather than a full name where the name is not the point.

Limitations

Technology systems may be unavailable, inaccurate, delayed, incomplete, compromised, or dependent on third-party data. Protocol Wealth does not guarantee the availability, accuracy, or performance of any third-party technology provider.

Tax and planning estimates are based on assumptions and on tax law as it stands, which is complex and changes; actual results may differ. Protocol Wealth does not provide tax advice; consult your tax professional.

Protocol Wealth, LLC is a registered investment adviser (CRD #335298). Registration does not imply a certain level of skill or training. Investing involves risk, including possible loss of principal; past performance does not guarantee future results. This is a disclosure, not a contract term. It states Protocol Wealth’s current practice, is delivered before the Client Advisory Agreement is signed - section 5 of that Agreement records the delivery - and is superseded by a later edition rather than amended.