Custody, Account Control & Digital-Asset Safekeeping

How client assets, qualified custodians, wallets, and account-control responsibilities are framed.

Effective August 13, 2026 - v1.1

This disclosure supplements the Client Advisory Agreement, Form ADV Part 2A, and any digital-asset or institutional schedule. It summarizes custody and safekeeping concepts for traditional assets and digital assets.

Traditional Assets

Traditional securities and cash are generally held at a qualified independent custodian in an account titled in the client’s name or in the name of a trust, entity, retirement account, or other fiduciary arrangement designated by the client. The custodian is responsible for safekeeping, settlement, trade confirmations, official statements, and tax forms.

Protocol Wealth may have discretionary trading authority and fee-deduction authority if granted by the client. Fee-deduction authority creates limited custody under applicable adviser rules. Protocol Wealth is not a qualified custodian and does not hold client assets; direct fee deduction is the only circumstance in which Protocol Wealth is deemed to have custody. Protocol Wealth does not otherwise maintain possession or control of traditional client assets.

Digital Assets

Digital assets may be held or accessed through one or more structures, depending on the service elected and approved in writing:

- A digital-asset qualified custodian, such as Anchorage Digital, BitGo, or another approved provider.
- An institutional MPC wallet or policy-controlled wallet infrastructure, such as Fordefi or another approved provider.
- A client-approved trading venue, OTC counterparty, protocol, smart contract, staking arrangement, lending arrangement, liquidity pool, or other onchain activity.

Some digital-asset activities may require movement outside a qualified custodian or may involve assets that are not protected by the SEC custody rule, SIPC, FDIC insurance, or ordinary securities-custody protections. Risks may include insolvency, hacking, smart-contract failure, fraud, settlement failure, operational error, validator/slashing risk, bridge risk, chain halt, or permanent loss.

Client Control and Authorization

Clients retain beneficial ownership of their assets. Digital-asset transfers and wallet policies should use documented authorization workflows, whitelisted addresses, approval thresholds, velocity limits, and trusted communication channels where applicable.

Protocol Wealth does not ask clients for seed phrases or private keys. Clients are responsible for safeguarding personal devices, email accounts, wallet credentials, recovery materials, and authorized representative information.

Official Records

Custodian statements, qualified-custodian statements, platform records, wallet transaction histories, blockchain records, and other provider records are the official or primary records for their respective assets. Protocol Wealth reports are supplemental and should be reviewed alongside those records.

Succession and Estate Access

Digital assets can become inaccessible if credentials, authorization paths, recovery materials, or fiduciary instructions are incomplete or unavailable. Clients are responsible for maintaining estate, succession, and access plans with qualified legal advisers and approved custodians or wallet providers.

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