AI & Technology Use Disclosure

Technology, analytics, and AI-assisted workflows.

Effective November 9, 2026 - Version Date November 9, 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.

Each AI feature in the client portal starts only when you accept its disclosure in the portal.

Client Portal Assistant

The AI assistant in the client portal answers your questions about your own information. Its answers are not reviewed by an adviser first and can be wrong. It covers your own accounts, balances, transactions and risk profile, your holdings with their cost basis and unrealized gain in the order you chose, and models you built yourself. It can do illustrative planning calculations and pass a planning note to the advisory team. It does not give investment, tax or financial advice, rate your holdings or models, trade, move money, or change accounts. You or your adviser can turn it on, it runs only after you accept its disclosure in the portal, and either of you can turn it off.

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. These values appear to you only after you accept their disclosure in the portal.

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.

A gain or loss calculated from a cost basis read from these documents or entered by hand is shown only after you accept the calculated-estimates disclosure, labeled "Estimated calculated from unverified values may be wrong"; it is not your tax basis or your actual return. No advice accompanies these values. You can leave any of these values out of your own views; that 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.

AI Suggestions

If you turn on AI Suggestions in the client portal, AI (Anthropic's Claude) suggests labels for your own bank transactions (a move between your own accounts, income, a possible duplicate, a spending category, or a purpose: personal, or one of your own businesses or rental properties, by the name you gave it and never an address) and rules that would apply such a label to similar transactions. The suggestions are not reviewed by an adviser before you see them and can be wrong. Nothing changes until you confirm a suggestion. A label you confirm counts only in your own portal views (Transactions, Cash Flow and the AI Assistant). It never changes our fees or your statements, and it changes your financial plan only if an adviser adopts it. You can undo a label or turn off a rule, and you can turn AI Suggestions off. Turning it off stops new suggestions; labels and rules you confirmed keep applying until you undo or turn them off. A purpose is only a label; it is not tax advice.

AI Insights

If you turn on AI Insights in the client portal, AI (Anthropic's Claude) writes a short analysis of your own holdings, the stocks on your watchlist and the scores you imported, labeled "AI Insight: not a recommendation". Recommendations come only from your advisor. Insights are written and checked so that they do not tell you to buy, sell or take any other action, or project a return or yield. They are not reviewed by an adviser before you see them and can be wrong. Your adviser can see each insight and withdraw it.

Our software calculates the figures from your holdings as your portal shows them. Claude receives only a description of each figure and placeholders, never the figures themselves or the names of your holdings, and our software fills them in. Your household members' holdings and anything you hid are left out. Only you can turn AI Insights on; you or your adviser can turn it off. We keep each request as sent and each insight as part of our books and records.

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. For AI Suggestions and AI Insights we also keep the request as it was sent. 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.

Check anything AI tells or shows you, including AI Suggestions, AI Insights, Unverified values and estimated gains, against your statements or with your adviser before you rely on it.

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.