

Deem Asset Management, LLC
Privacy Notice
August 26, 2025

Deem Asset Management, LLC maintains strict protection standards of personal and nonpublic client information that has been shared with us. Our Compliance Manual contains associated policies and procedures related to administrative, technical, and physical safeguards of client information. All parties involved at our company may have access to this manual.

The nature of our advisory business requires the collection of personal information from our clients. This policy is designed to ascertain confidentiality and proper safeguarding of information shared by past and present clients.

Information We Collect From You

Deem Asset Management, LLC collects personal information about its clients to meet individual or group advisory servicing needs effectively. Collected information may include name and address, date of birth, financial and credit account numbers, telephone numbers, credit history, investment objectives, experience in securities investing, net worth, assets held, income data from past and present, account information such as transactional activity or balances, social security number, EIN, employer information past and present, and more. We collect this information on our website, client agreements, authorized broker/dealers and custodians of your assets or from other sources authorized by you to send personal information such as accountants or lawyers.

How We Use Technology for Research and Your Personal Information

Our firm utilizes an internally developed, AI-assisted equity research system called ADVYZE to support our human advisors in analyzing public and third-party financial information.

It is important to note that ADVYZE does not collect, access, or utilize client personal or nonpublic information, account data, or any personally identifiable information (PII).

This tool operates entirely independently of our client management and trading systems. The analysis performed by ADVYZE is based solely on public data sources (such as SEC filings and company disclosures) and other third-party information.

All final investment recommendations and trading decisions are made by our human advisors, who apply their discretion and consider your individual financial profile, objectives, and risk tolerance, which are not accessible to the ADVYZE system. We will not share your PII with any external AI providers or use it for training our AI models.

Information We Collect From Other Sources

Our firm collects and analyzes all information provided to us on application forms. We will have access and possession on transactions with our firm as well as other companies. Your personal information is collected from third-party service providers such as broker/dealers, custodians or other authorized sources such as accountants and lawyers.

Note: The public and third-party data we use for our AI-assisted research tools, such as ADVYZE, is separate from the personal information we collect from you, your custodians, and other authorized sources. This research data is not client-specific.

How Your Information Gets Used

All financial companies need to share client personal information to operate their business. You may limit sharing of your personal information in certain cases, but not all. For example, our firm is willing to share information about your creditworthiness to certain affiliated third parties such as a bank or broker/dealer as permitted by law, but you may limit this sharing as an option.

We may share your personal information with trusted third-party affiliates for marketing purposes and you may limit this sharing. However, you may not limit sharing of your information to certain third parties. This would include firm / client relationship account information at a broker/dealer for everyday business purposes. We use this personal information to tailor financial products and services provided by our firm to your needs. Legitimate everyday business requests such as transaction processing, account maintenance and any legal, regulatory, or credit related requests will cause the firm to share your personal information without limitations.

Information Safeguarding

As policy, the sharing of client information by firm representatives to third parties is prohibited outside of broker-dealer and custodian arrangements which require certain information sharing to provide services. Third parties outside these arrangements who request client information require written or verbal consent granted by the client or the authorized individual acting on behalf of the client. This includes our solicitation arrangements.

Physical and electronic customer personally identifiable information (PII) shall be stored in a secure location. The criticality of preventing unauthorized access to client PII is highly recognized by our firm given potential damages or harm that could occur. Our computer systems have effective safeguarding capabilities which conform to industry standards and regulatory requirements. Our systems, policies and procedures are designed to protect the security and confidentiality of client personally identifiable information (PII) in physical and electronic format. This includes ensuring that AI systems, such as ADVYZE, are not connected to our client data systems and do not have access to PII. While not limited to these measures exclusively, we utilize multi-factor authentication, password protection, the use of cloud technologies, anti-virus software, paper shredders, updated computer equipment and proper training of firm employees to safeguard client information.

Limit The Sharing of Your Information

Our firm reserves the right to disclose nonpublic personal information to nonaffiliated third parties. You may opt-out of third-party affiliate marketing that could result in solicitations.

You can contact us anytime to opt-out of certain disclosure of non-public personal information sharing to nonaffiliated third parties. This optionality is originally provided to you in the Investment Advisor Agreement with Deem Asset Management. You can change your selection at any time throughout the life of the advisory agreement.

Any opt-out election is effective into perpetuity or until a renewal is required by our Firm. If no preference is given at time of a renewal, the opt-out status does not change.

Contact

If you have any questions or concerns, contact Anthony Deem, President & Chief Compliance Officer at 330-685-1975 or at a@deemasset.com.