

Deem Asset Management, LLC
Privacy Notice
March 30, 2026

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, net worth, income data, financial account balances, social security number, EIN, employer information, and more.

We may collect this information on deemasset.com, client agreements, authorized broker/dealers and custodians of your assets or from other sources authorized by you to send personal information.

If you access client-facing technology we provide, such as the ADVYZE platform (to be available at advyze.app) we may also collect information associated with your platform use, including authentication details (email and account credentials you create for the platform), device and browser information, IP address indicators, timestamps, and platform security logs. Your platform credentials are secured using industry-standard encryption and hashing. Firm administrators cannot view or retrieve your password.

Research queries, AI-generated outputs, and related advisory records are retained. As the platform administrator, the firm's CCO or authorized personnel may access platform records, including research queries and AI-generated outputs, for supervisory review. The firm may also reset multi-factor authentication enrollment for account recovery purposes; such actions are logged and the affected client is notified by email.

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.

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 such as our custodian and 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.

How We Use Technology for Research and Your Personal Information

Our firm utilizes an internally controlled equity research system called ADVYZE which operates independently of the firm's trading and custodial systems and does not independently access client account data, portfolio holdings, or transactional information maintained by the firm's custodian. The AI-powered research and analysis features are not based on personal or nonpublic information.

Beta users will soon access the platform directly and may create and store research content within ADVYZE, such as notes, watchlists, and research queries. This client-generated content is managed by the firm and subject to its obligations.

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. The firm does not programmatically provide your personal identifiable information (PII) to external AI providers, and your identity is not shared with AI models processing research queries. However, if you voluntarily include personal information in a research query or chat message on the platform, that information may be transmitted to the third-party AI provider as part of the query. Clients are advised not to include personally identifiable information in ADVYZE research queries. AI providers used by the firm process queries under contractual terms that prohibit the use of input data for model training. We will not use your PII for training AI models.

AI-Assisted Financial Planning Analysis

The firm may use AI tools (including Anthropic Claude and Microsoft Copilot) to assist with discrete financial planning and research tasks. When using these tools for financial planning analysis, the firm works only with de-identified financial information, meaning information that has had all direct identifiers (such as name, Social Security number, date of birth, and similar identifying details) removed so that it cannot reasonably be linked to any specific individual.

Examples of de-identified information used in this context include anonymized income ranges, asset and liability estimates, age, and general risk profile characteristics. The firm does not

provide your PII or other direct identifiers to these tools as part of financial planning workflows. This practice is governed by the firm's internal AI use policies, which prohibit firm representatives from uploading client PII or non-public personal information to external AI systems.

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 any solicitation arrangements.

Physical and electronic customer PII is stored in a secure location to help prevent unauthorized access and potential client damage. 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 PII in physical and electronic format. This includes ensuring that AI research features within ADVYZE do not independently access client PII or sensitive data maintained in the firm's trading and custodial systems. 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. The opt out option 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 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.