



Octo Capital, LLC  
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## Privacy Policy Notice

Date: March 27, 2026

If you have any questions about the contents of this Privacy Policy, please contact us at (248) 731-7729 or by email at [dshub@octo-capital.com](mailto:dshub@octo-capital.com). The information in this document has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Octo Capital is an SEC-Registered Investment Adviser. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about Octo Capital is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Octo Capital, LLC has adopted this privacy policy, recognizing that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect, how we use it, and how we safeguard it.

**Information We Collect:** We collect certain nonpublic information about you ("Customer Information"). The essential purpose of collecting Customer Information is to allow us to provide advisory services.

Customer Information we collect may include the following:

- Information that you provide on applications or other forms, which may include personal and household information such as income, spending habits, investment objectives, customer information, statements of account, and other records concerning your financial condition and assets. Additional information we may gather includes information concerning employee benefits and retirement plan interests, wills, trusts, mortgages, and tax returns.
- Identifying information, such as your name, age, address, Social Security number, etc.
- Information about your transactions with us or others (e.g., broker/dealers, clearing firms, or other chosen investment sponsors).

- Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials, we may use to provide an appropriate recommendation or to fill a service request.

**Security of Your Information:** We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

**Information We Disclose:** We do not disclose the nonpublic personal information we collect about our customers to anyone except (i) in furtherance of our business relationship with certain service providers and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, third-party service providers, insurance companies, etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited from using or sharing the information for any other purpose.

**Former Clients:** If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.

**Disclosures to Associated Firms:** Certain partners or advisors are associated with a related insurance agency. If you are a client of a related insurance agency, these partners or advisors may obtain the information necessary to establish and/or service your account.

### **Our Incident Response & Safeguarding Program**

In compliance with the 2024 amendments to Regulation S-P, we have enhanced our security protocols to include a formal **Incident Response Program**.

- **Enhanced Oversight:** We perform rigorous due diligence on all third-party vendors. Our contracts now require these providers to notify us within 72 hours if they experience a data breach involving your information.
- **Data Breach Notification:** If we determine that your "sensitive customer information" (such as your SSN or account credentials) has been accessed without authorization, we will perform a reasonable investigation. If there is a risk of harm, we will notify you in writing as soon as practicable, and no later than 30 days after we become aware of the incident.

- **Physical & Digital Security:** We restrict access to your NPI to employees who need it to perform their jobs. We maintain physical, electronic, and procedural safeguards that meet or exceed federal standards.

**Changes to Our Privacy Policy:** Except as required or permitted by law, we do not share confidential information about you with non-affiliated third parties. In the unlikely event that there were to be a change in this fundamental policy that would permit or require additional disclosures of your confidential information, we will provide written notice to you, and you will be given an opportunity to direct us as to whether such disclosure is acceptable.