Martino Capital, LLC – Privacy Notice

Effective October 29, 2026. Last updated: October 29, 2026.

FACTS	WHAT DOES MARTINO CAPITAL DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the services you have with us. This information can include: Social Security number and date of birth; income, net worth, assets and account balances; investment experience, goals, risk tolerance and the answers in your Client Profile; account transactions and holdings; contact information.
How?	All financial companies need to share customers' personal information to run their everyday business. The table below lists the reasons financial companies can share their customers' personal information, the reasons Martino Capital chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Martino Capital share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to regulators	Yes	No
For our marketing purposes – to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday	No	We don't share

business purposes – information about your creditworthiness		
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions? Call (303) 771-4357 or write to Martino Capital, LLC, 9113 E Vassar Ave, Denver, CO 80232. Email: tom@martinocapital.com.

Who we are

Martino Capital, LLC, an investment adviser registered with the State of Colorado (CRD 329648). This notice applies to current and former clients.

What we do

How do we protect your information?

We maintain administrative, technical and physical safeguards designed to protect your information, including individual logins, encrypted (HTTPS) connections, access limited to the personnel who serve your account, and contractual confidentiality and security obligations for our service providers.

How do we collect your information?

We collect it when you complete our Client Profile and account paperwork, open an account, give us instructions, and from your custodian (Charles Schwab and Columbia Private Trust) and other firms that provide financial services to you.

Who receives your information to service your account?

Your custodian; our portfolio-management and reporting system (Black Diamond); our hosting provider for our software (currently Hetzner); and, as described below, our third-party artificial-intelligence service provider. These service providers may use your information only to provide services to us. We do not sell your information.

Our technology: S.W.E.L.L. and FinApp

S.W.E.L.L. (Strategic Wealth Enhancement and Learning Logic) is our firm's technology platform. One part of it, FinApp, is research and portfolio-construction software that runs on a server we rent and control. Only Martino personnel with individual logins can reach it, and each advisor sees only work for that advisor's own clients (supervisors may review all work). FinApp does not place trades and has no connection to your custodial account.

Artificial intelligence

When your advisor uses the FinApp research assistant ("Ask FinApp") to ask questions about your portfolio memo, the question and the memo's content – including your name and Client Profile answers – are sent to our third-party AI service provider, xAI (Grok), to generate a response. xAI is the only AI service that processes client information. Our market and fund data providers (currently Financial Modeling Prep and FastTrack) and the SEC's EDGAR system do not receive any client information. AI output is used only as working notes for your advisor.

How long do we keep information?

Client intake forms (Client Profiles), FinApp memos and research-assistant conversations are held on an encrypted private virtual server for 90 days and then automatically purged. Your advisor files your Client Profile, final memo and relevant research-assistant conversations in your client file, which is our official record and is kept for at least five years (or longer if required by law).

Why can't you limit all sharing?

Federal law gives you the right to limit only sharing for affiliates' everyday business purposes (creditworthiness), affiliates marketing to you, and nonaffiliates marketing to you. Martino Capital does not engage in any of these, so no opt-out is needed. State laws may give you additional rights.

If a breach occurs

If we determine that a security breach involving your personal information has occurred, we will notify you as required by law, including within 30 days under Colorado law (C.R.S. 6-1-716).

Changes

We provide this notice when our relationship begins and annually, and we will send you a revised notice if our practices change, as required by law. This notice is also available at martinocapital.com and on request at (303) 771-4357.

If your advisor leaves Martino Capital, your information stays with Martino Capital. A departing advisor may not take or keep client information, including contact information.

Definitions

- Affiliates: companies related by common ownership or control. Martino Capital has no affiliates that receive client information; only Martino Capital receives it.
- Nonaffiliates: companies not related by common ownership or control, e.g., your custodian, Black Diamond, Hetzner and xAI.
- Joint marketing: Martino Capital does not jointly market.