




Las Olas Capital Privacy Policy

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This "Privacy Policy" has been created to meet the requirements described in FINRA Rule 3110. This Privacy Policy is reasonably designed to enable our firm to meet its obligations to protect customer information and records.

Authorized Approval Signature: 
Printed Name & Title: Raymond Catone, COO
Date: April 24, 2026

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): _____
Recordkeeping: Discard after _____ (date three years from termination of use).

Introduction

This Privacy Policy applies to the affiliated entities: Las Olas Capital Partners, LLC, a registered broker-dealer, Las Olas Capital Advisors, LLC, a registered investment adviser, and Las Olas Capital Wealth, LLC, a registered investment adviser. These affiliated entities are collectively referred to throughout as “Las Olas Capital”, “we”, or “us”.

Protection of financial and personal customer information is a key responsibility and obligation of FINRA member firms. Under the SEC’s Regulation S-P, firms are required to have policies and procedures addressing the protection of customer information and records. This includes protecting against any anticipated threats or hazards to the security or integrity of customer records and information and against unauthorized access to or use of customer records or information. The rule also requires firms to provide initial and annual privacy notices to customers describing information sharing policies and informing customers of their rights.

Additionally, Regulation S-ID requires member firms that offer or maintain covered accounts to develop and implement written identity theft prevention programs.

In May 2024, the SEC adopted amendments to Regulation S-P that strengthen protections for customer information. These amendments require covered institutions, including broker-dealers and investment advisers, to adopt written policies and procedures for an incident response program reasonably designed to detect, respond to, and recover from unauthorized access to or use of customer information. The amendments also require firms to notify affected individuals whose sensitive customer information was, or is reasonably likely to have been, accessed or used without authorization, as soon as practicable but no later than 30 days after becoming aware of the incident. Las Olas Capital has implemented incident response procedures consistent with these requirements, as described in its Written Information Security Program and Compliance Manual.

Firms should be aware that customer information and records can be compromised in a variety of ways. This is especially true for firms that offer online, Web-based access to trading platforms and customer account information. Firms must understand and address the potential risks of brokerage account intrusions, whereby an unauthorized person gains access to a customer account and either steals available assets or misuses the account to manipulate the market.

Intrusions are generally accomplished through the theft of the login credentials of a customer or firm employee. Accounts have also been breached through fake electronic instructions (e.g., email requests for funds transmittals). Since this type of illicit activity can raise both investor protection and market integrity concerns, it is essential that firms use reasonable measures to protect customer information and assets. FINRA Rule 3110 specifically requires firms to adopt procedures concerning transmittals of customer funds that include a means of customer confirmation.

Las Olas Capital has adopted this privacy policy with recognition 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 and how we use and safeguard that information.

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

- Information that you provide on applications or other forms. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with 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.

Text Messaging: By opting into this messaging program, you agree to receive promotional, informational, or transactional messages related to Las Olas Capital via SMS. Message frequency may vary based on your interactions and preferences. You can cancel the SMS service at any time. Simply text “STOP” to the shortcode. Upon sending “STOP,” we will confirm your unsubscribe status via SMS. Following this confirmation, you will no longer receive SMS messages from us. To rejoin, sign up as you did initially, and we will resume sending SMS messages to you. If you experience issues with the messaging program reach out directly to investorrelations@lasolascap.com or 954-289-4692. Carriers are not liable for delayed or undelivered messages. As always, message and data rates may apply for messages sent to you from us and to us from you. Message frequency varies. For questions about your text plan or data plan, contact your wireless provider. SMS opt-in and phone numbers collected for SMS communication purposes will not be shared with any third party or affiliates for marketing purposes.

Information We Disclose: As required or permitted by law, we disclose the nonpublic personal information we collect about our customers: (i) to persons necessary to effect the transactions and provide the services that our customers authorize, such as broker-dealers, custodians, independent managers 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 the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose.

Information We Disclose to Affiliated Third Parties: We disclose the following information to affiliated third parties in furtherance of the advisory relationship, including information necessary to effect transactions and provide services to our customers. The affiliated third parties to whom we may disclose this information are Las Olas Capital Partners, LLC, Las Olas Capital Advisors, LLC, and Las Olas Capital Wealth, LLC

Disposal of Records: When we no longer have a business need or legal obligation to retain your nonpublic personal information, we will dispose of it in a manner that ensures its confidentiality is maintained. Paper records containing personal information are destroyed using cross-cut shredders or bonded document destruction services. Electronic records are permanently erased or the storage media is physically destroyed. We also require any third-party service providers engaged to dispose of such information to do so in accordance with these standards.

Incident Response and Breach Notification: Las Olas Capital maintains a written incident response program designed to detect, respond to, and recover from unauthorized access to or use of customer information, consistent with SEC Regulation S-P as amended in 2024. In the event that your sensitive personal information is, or is reasonably likely to have been, accessed or used without authorization, we will notify you as soon as practicable, and in any event no later than 30 days after we become aware of the incident. Such notification will include details of the incident, the types of information involved, and steps you may take to protect yourself. For more information about our incident response procedures, you may contact the Chief Compliance Officer at 954-289-4692.

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.

Changes to Our Privacy Policy: In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.

Questions: If you have questions about this privacy notice or about the privacy of your customer information call our main number 954-289-4692 and ask to speak to the Chief Compliance Officer.

FACTS

WHAT DOES LAS OLAS 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number or taxpayer identification number ■ Home address or email address ■ Assets, income, financial information, transaction history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Las Olas Capital chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Las Olas 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 credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	Yes	Yes
For affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing	<ul style="list-style-type: none"> ■ Call 954-289-4692 ■ Visit us online: www.lasolascap.com ■ Mail the form below <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 10 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
Questions?	Call 954-289-4692 or go to www.lasolascap.com

Mail-in Form	
Leave Blank	Mark any/all you want to limit:
OR	<input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.	<input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.
<input type="checkbox"/> Apply my choices only to me	<input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.
Name	
Address	
City, State, Zip	
Account #	
Mail to:	
Las Olas Capital	
888 E Las Olas Blvd Suite 200	
Fort Lauderdale, FL 33301	

Who we are	
Who is providing this notice?	Las Olas Capital
What we do	
How does Las Olas Capital protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>Las Olas Capital limits access to your information to those employees and service providers who are involved in offering or administering the products or services to you.</p>
How does Las Olas Capital collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ Provide your Personal Information ■ Seek Investment Advice ■ Complete an Application <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account, I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies. References herein to Las Olas Capital refer to the following affiliated entities:</p> <ul style="list-style-type: none"> ■ <i>Las Olas Capital Partners, LLC</i> ■ <i>Las Olas Capital Advisors, LLC</i> ■ <i>Las Olas Capital Wealth, LLC</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> ■ <i>Las Olas Capital does not share with non-affiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Las Olas Capital does not jointly market.</i>

Other important information
<p>For California Residents. In accordance with California law, we will not share information we collect about you with non-affiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts.</p>