Keychain Corp,

doing business as

Keychain Asset Management

Form ADV Part 2A – Disclosure Brochure

Effective: July 1, 2025

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Keychain Corp, doing business as Keychain Asset Management (referred to herein as "Keychain Asset Management" or "the Advisor"). If you have any questions about the contents of this brochure, please contact the Advisor at 503-893-8385 and/or compliance@keychainassets.com.

Keychain Asset Management is an investment adviser registered with the State of Oregon. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Keychain Asset Management is available on the SEC's website at https://www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 337629.

Keychain Asset Management
914 6th St Oregon City OR 97045
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Item 2: Material Changes

Since our last annual updating amendment dated July 1, 2025, the following material change has occurred:

- **Outside Business Activity:** Brent Pearson, Chief Compliance Officer and Investment Adviser Representative, has authored a book titled '*Understanding Bitcoin and Protecting Your Assets With Crypto: How to Secure Your Wealth in Any Financial Climate*.' Further details regarding this activity and any associated compensation can be found in Brent Pearson's Brochure Supplement (Item 19 of this brochure).
- **Solvency Requirement:** This Brochure has been amended to remove an inaccurate reference to a $10,000 minimum net worth requirement and to reflect the correct state solvency requirement, which is monitored through the annual submission of financial statements.

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Item 3: Table of Contents

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Item 4: Advisory Business

Keychain Corp, doing business as Keychain Asset Management, is an Oregon-registered investment adviser, established in 2025. The firm is owned and operated by Brent Pearson, who also serves as its Chief Compliance Officer. The firm was founded with the core principle of empowering clients to navigate the rapidly changing, financially complex landscape of modern finance. We are dedicated to providing education, transparency, and upholding our fiduciary responsibility in all our client relationships.

We offer comprehensive investment advisory services tailored to individuals, families, and businesses. Our services include:

A. Full Service Investment Advisory

We provide personalized financial planning and traditional wealth management services designed to help clients achieve their long-term financial goals. This encompasses:

- Wealth Management and Growth: Strategic portfolio construction and ongoing management focused on capital appreciation, income generation, and long-term wealth accumulation across various traditional asset classes.
- Retirement Planning: Strategies for accumulating wealth, generating income during retirement, and legacy planning, including optimizing employer-sponsored plans, IRAs, and other retirement vehicles.
- Life Stages Planning: Guidance and support through significant life events such as career changes, marriage, purchasing a home, starting a family, saving for college, managing debt, and wealth transfer strategies. We work to align financial strategies with evolving personal and family objectives.

B. Digital Asset Portfolio Management

Recognizing the growing importance of digital assets, we offer specialized portfolio management services for clients seeking to incorporate cryptocurrencies and other digital assets into their overall financial strategy. Our approach focuses on:

- Risk-adjusted strategies tailored to client risk tolerance.
- Diversification within digital asset classes and across traditional assets.

- Secure custody solutions, primarily utilizing qualified third-party custodians such as BitGo or other leading institutional-grade platforms compliant with relevant regulations, where appropriate for discretionary accounts.

C. Digital Payments & Business Integration Consulting

We provide consulting services for individuals and businesses interested in understanding and integrating digital payments and cryptocurrency into their daily lives or commercial operations. This includes:

- Guidance on setting up and managing digital wallets.
- Understanding transaction processes, fees, and best practices for using digital currencies for purchases or business receipts.
- Strategic advice on the benefits, risks, and regulatory considerations of digital asset adoption.

D. Advisory for Other Investment Advisers (B2B Solutions)

We leverage our specialized expertise in digital assets to offer sub-advising services and turnkey solutions to other Registered Investment Advisers (RIAs). This allows other firms to compliantly and confidently offer digital asset services to their own clients without developing in-house expertise or infrastructure from scratch. Our solutions may include:

- Providing investment models and research for digital asset allocation.
- Guidance on regulatory and compliance frameworks related to digital assets for RIAs.
- Facilitating access to institutional-grade custody solutions.

E. Digital Asset Readiness Assessment

This is a focused, introductory consultation designed to help individuals determine if digital assets align with their financial goals. For a fixed fee ranging from $75 to $500, we offer a focused session of a pre-determined duration to provide a high-level preliminary review of a client's situation. The goal is to explore how digital assets might potentially help protect wealth, health, or legacy, while also discussing the inherent risks and volatility. This assessment is not a comprehensive financial plan, specific investment advice, or a guarantee of any outcome.

Assets Under Management (AUM):

As a newly registered firm, Keychain Asset Management currently manages limited assets. We are actively building our client base and anticipate our AUM to grow as we onboard new clients.

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Item 5: Fees and Compensation

The fees charged by Keychain Asset Management vary depending on the service provided, and they are always fully disclosed to clients in writing prior to engagement. We strive for transparent and competitive fee structures.

A. Full Service Investment Advisory & Digital Asset Portfolio Management:

- Our primary compensation for ongoing investment advisory and digital asset portfolio management services is an asset-based fee charged as a percentage of the Assets Under Management (AUM).
- Fees are typically paid either monthly or quarterly in advance or arrears, based on the account value on the last day of the preceding quarter or first day of the current quarter.
- Our annual fee rates generally range from 0.75% to 2.50%, depending on the total AUM, complexity of the client's financial situation, and the scope of services provided.
- Example Fee Schedule:
  - Assets up to $500,000: 1.25% annually
  - Assets from $500,001 to $1,000,000: 1.00% annually
  - Assets over $1,000,000: 0.75% annually
- All fees are clearly outlined in each client's advisory agreement. Fees are negotiable under certain circumstances, such as for larger accounts or family relationships where multiple accounts are managed.

B. Digital Payments & Business Integration Consulting:

- These services are typically offered on a fixed-fee or hourly basis, depending on the scope and complexity of the project.
- Fixed fees will be quoted in advance for specific projects.
- Hourly rates for consulting are $150 - $500 per hour depending on the number of hours required and the complexity of the services performed.

- A portion of the fixed fee or an initial retainer may be required upfront for these services.

C. Digital Asset Readiness Assessment:

- This introductory service has a fixed fee ranging from $75 to $500. For most individual or family assessments, the fee is $75 for a 30-minute session. The specific fee and duration will be agreed upon prior to the consultation.

D. Advisory for Other Investment Advisers:

- Fees for sub-advising and turnkey solutions for other RIAs are negotiated on a case-by-case basis and will be detailed in a separate written agreement with the referring RIA firm. This may include asset-based fees, fixed fees, or a combination thereof.

Other Fees:

Clients may incur other fees charged by third parties in connection with their investment accounts, such as:

- Custodian fees (e.g., trading costs, account maintenance fees, or technology platform fees charged by custodians).
- Transaction fees or "gas fees" associated with digital asset transactions (these are network-specific and not charged by Keychain Asset Management).
- Exchange fees for buying or selling digital assets.
- Wire transfer fees.
- Other fees as disclosed by the relevant third-party service providers.

Keychain Asset Management does not receive commissions or other compensation from the sale of securities or other investment products. Our compensation comes solely from the fees paid by our clients, ensuring our advice is unbiased and always in the client's best interest.

Item 6: Performance-Based Fees and Side-by-Side Management

Keychain Asset Management does not charge performance-based fees for its services. Performance-based fees are fees calculated based on a share of capital gains on or appreciation of the assets of a client. Our fees are based solely on the assets under management, fixed fees, or hourly rates as described in Item 5.

Therefore, we do not engage in side-by-side management with performance-based fees.

Item 7: Types of Clients

Keychain Asset Management provides investment advisory services to the following types of clients:

- Individuals: Including single individuals, couples, and families.
- High-Net-Worth Individuals: Individuals who meet the SEC's definition of a high-net-worth individual.
- Businesses: Including small to medium-sized businesses.
- Trusts and Estates: Including those established for individuals, families, or charitable purposes.
- Charitable Organizations: Including foundations, endowments (such as college endowment funds), and other non-profit organizations.
- Other Organizations: Including other types of investment vehicles or organizations that invest money.
- Other Investment Advisers (B2B Solutions): As described in Item 4.D.

We do not generally impose a minimum account size requirement for engaging in financial planning or consulting services on a fixed-fee or hourly basis. However, for our discretionary Digital Asset Portfolio Management services, we may require a minimum account size of $50,000 to ensure efficient portfolio management and diversification. This minimum may be waived or reduced at our discretion.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss

We employ a combination of investment analysis methods and strategies, adapting our approach to meet each client's unique financial goals, risk tolerance, and time horizon. Our strategies integrate traditional and digital asset perspectives.

A. Methods of Analysis:

- Fundamental Analysis: We evaluate the intrinsic value of an investment by examining related economic, financial, and other qualitative and quantitative factors. For traditional assets, this includes analyzing financial statements, industry trends, and management quality. For digital assets, it involves reviewing whitepapers, network adoption, developer activity, tokenomics, and use cases.
- Technical Analysis: We evaluate investments by analyzing statistics generated by market activity, such as past prices and volume. This method does not attempt to measure a security's intrinsic value but instead uses charts and other tools to identify patterns that can suggest future activity.
- Quantitative Analysis: This involves using mathematical and statistical modeling to evaluate investment opportunities and manage risk. This is particularly relevant for digital assets where large datasets of on-chain and market data are available.

B. Investment Strategies:

- Long-Term Investing: We primarily recommend long-term investment strategies for both traditional and digital assets, holding positions for more than a year to align with client goals and potentially benefit from compounding growth and favorable tax treatment.
- Diversification: We emphasize diversification across various asset classes (including traditional equities, fixed income, and digital assets), sectors, and geographies to mitigate risk. Within digital assets, we may recommend diversification across different categories (e.g., Bitcoin, Ethereum, decentralized finance (DeFi) tokens, stablecoins) based on their risk/reward profiles and correlation.

- Rebalancing: Portfolios may be periodically rebalanced to maintain target asset allocations and risk levels.
- Custodial Integration: For digital assets, we focus on integration with qualified custodians that offer institutional-grade security, regulatory compliance, and insurance where available.

C. Risk of Loss:

Investing in securities and digital assets involves risk of loss that clients should be prepared to bear. While our strategies aim to mitigate risk, no investment strategy can guarantee a profit or protect against loss.

General Investment Risks:

- Market Risk: The value of investments can fluctuate due to economic, political, or social factors impacting the overall market.
- Inflation Risk: The purchasing power of money and investments can decrease over time due to rising prices.
- Interest Rate Risk: Changes in interest rates can affect the value of bonds and other fixed-income investments.
- Liquidity Risk: Some investments may be difficult to sell quickly without a significant loss in value.

Specific Digital Asset Risks:

- Extreme Volatility: Digital asset prices can experience rapid and unpredictable fluctuations, often more extreme than traditional securities. This could result in substantial losses in a short period.
- Regulatory Risk: The regulatory landscape for digital assets is rapidly evolving and uncertain. New laws or regulations could significantly impact the value and legality of digital assets, potentially leading to bans, restrictions, or taxation changes.
- Technological Risk: Digital assets rely on complex and evolving technologies (blockchain, cryptography). Risks include software bugs, network congestion, security vulnerabilities (e.g., smart contract exploits), and dependence on internet infrastructure.

- Security Risks & Custody: While we use qualified custodians, digital assets are susceptible to theft, hacking, or loss if private keys are compromised. The security of digital assets held by third-party custodians depends on their internal security measures. Clients should understand the risks associated with various custodial methods (hot wallets, cold storage, multi-signature wallets).
- Market Manipulation: The digital asset market is relatively less regulated than traditional financial markets, making it potentially more susceptible to manipulation.
- Lack of Centralized Authority: Unlike traditional currencies, digital assets are decentralized, meaning there is no central bank or government to back them. This can lead to different risks regarding stability and recovery in crisis situations.
- Irreversibility of Transactions: Digital asset transactions are generally irreversible. Once a transaction is broadcast on the blockchain, it cannot typically be undone.
- Forking and Network Issues: Blockchain networks can undergo "forks" (protocol changes) that can create new versions of a digital asset or disrupt network operations.
- Cybersecurity Risks: Clients' personal devices and online accounts used to access digital assets are susceptible to phishing, malware, and other cyberattacks.

Clients will receive a detailed explanation of the risks associated with their specific investment strategies and asset allocations, particularly for digital assets, before making any investment decisions.

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Item 9: Disciplinary Information

Keychain Asset Management and its investment adviser representatives have no legal or disciplinary events that would be material to a client's evaluation of our advisory business or the integrity of our management. We have not been subject to any criminal or civil regulatory actions.

You are encouraged to seek additional information about Keychain Asset Management and its investment adviser representatives on the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov.

Item 10: Other Financial Industry Activities and Affiliations

Keychain Corp is the legal entity under which Keychain Asset Management operates its investment advisory business.

Brent Pearson, as the Chief Compliance Officer and sole Investment Adviser Representative of Keychain Asset Management, does not have any other financial industry activities or affiliations that would create a conflict of interest with clients of Keychain Asset Management.

We always act in a fiduciary capacity, meaning we are legally and ethically bound to put our clients' interests first, regardless of any other affiliations or activities. Any potential conflicts of interest arising from such affiliations are disclosed and managed to ensure client interests remain paramount.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics:

Keychain Asset Management has adopted a Code of Ethics that sets forth the ethical principles and conduct expected of all supervised persons. Our Code of Ethics outlines our fundamental obligation to act in the best interests of our clients. It addresses:

- Fiduciary duties.
- Compliance with securities laws.
- Prohibition against fraud and manipulation.
- Confidentiality of client information.
- Personal securities trading.
- Gifts and entertainment.
- Outside business activities.

A copy of our Code of Ethics is available to any client or prospective client upon request.

B. Participation or Interest in Client Transactions and Personal Trading:

We or our supervised persons may buy or sell securities or digital assets that are also recommended to clients. This presents a potential conflict of interest as we could benefit from the same investment actions as our clients. To address this:

- Personal Trading: We have established policies requiring pre-clearance for certain personal trades and prohibit certain trading activities that could create a conflict of interest, such as front-running client trades or trading on non-public information.
- Disclosure: We will disclose to clients if we have a material interest in a transaction we recommend.
- Prioritizing Client Interests: Client accounts will always be given priority over adviser or supervised person accounts in all transactions.

Our Code of Ethics is designed to prevent these conflicts and ensure that all personal trading is conducted in a manner that does not disadvantage clients.

Item 12: Brokerage Practices

A. Factors Used to Select Broker-Dealers / Custodians:

For both traditional securities and digital assets, Keychain Asset Management will recommend broker-dealers or custodians to execute transactions and hold client assets. Our selection of broker-dealers and custodians is based on our duty to obtain best execution for client transactions, considering various factors including:

- Security: For both traditional assets and digital assets, the safety and security of client funds and assets. For digital assets, this specifically includes a focus on robust cybersecurity measures, cold storage solutions, and strong internal controls of the custodian.
- Execution Capabilities: The ability to execute trades efficiently and at favorable prices.
- Reliability & Financial Stability: The financial strength and reputation of the broker-dealer or custodian.
- Services Provided: The range and quality of services offered (e.g., research, technology, reporting, customer service, tax reporting).
- Costs: The commission rates, transaction fees, and other charges.
- Technological Compatibility: Integration capabilities with our portfolio management systems.
- Regulatory Status: For digital asset custodians, their compliance with relevant state and federal regulations.

Clients retain the ultimate decision-making authority regarding the selection of their broker-dealer or custodian. We will provide recommendations, but clients are free to choose their own.

B. Research and Other Soft Dollar Benefits:

Keychain Asset Management does not receive "soft dollar benefits" (e.g., research, products, or services from a broker-dealer) in exchange for directing client transactions through that broker-dealer. Our selection is solely based on obtaining the best execution for our clients.

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C. Client Referrals:

We do not receive client referrals from broker-dealers or other third parties in exchange for directing client transactions.

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Item 13: Review of Accounts

Client accounts are reviewed regularly to ensure they remain consistent with the client's investment objectives, risk tolerance, and financial situation.

- Periodic Reviews: Client accounts are reviewed at least quarterly by the Chief Compliance Officer. These reviews involve assessing portfolio performance, adherence to asset allocation targets, and the ongoing suitability of investments.
- Triggering Events: Accounts may be reviewed more frequently upon the occurrence of significant events, including but not limited to:
    - Material changes in the client's financial situation, investment objectives, or risk tolerance (e.g., new job, marriage, birth of a child, inheritance, retirement).
    - Significant market fluctuations or economic events.
    - Changes in tax laws or regulations relevant to the client's investments.
    - Changes in the client's health or other personal circumstances impacting their financial plan.
    - Requests by the client.

Clients are encouraged to promptly notify Keychain Asset Management of any changes in their financial situation or investment objectives.

Item 14: Client Referrals and Other Compensation

Keychain Asset Management does not participate in any referral arrangements where we pay or receive compensation for client referrals. We do not receive compensation from third parties for recommending or selling investment products.

Our advice is independent and solely based on your best interests, free from conflicts of interest arising from referral fees or product sales commissions.

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Item 15: Custody

Keychain Asset Management does not take physical custody of client funds or securities.

When managing client assets, we use qualified custodians (such as BitGo, Inc., Charles Schwab & Co., Inc. solutions, or other regulated financial institutions) that hold client funds and securities directly in the client's name.

Our firm may have limited power of attorney over client accounts, which allows us to:

- Debit advisory fees directly from client accounts (with prior written authorization from the client).
- Execute trades on behalf of clients.

This limited power of attorney does not grant us the ability to withdraw client funds for our own benefit or transfer them to third parties without client authorization. Clients will receive account statements directly from their custodian at least quarterly. We encourage clients to review these statements carefully and compare them with any statements received from Keychain Asset Management.

Item 16: Investment Discretion

Keychain Asset Management typically provides investment advisory services on a discretionary basis. This means that with your written authorization (as outlined in your advisory agreement), we will have the authority to make investment decisions in your account, including selecting securities or digital assets and determining the amount to be bought or sold, without obtaining your prior approval for each individual transaction.

This discretionary authority allows for timely execution of investment strategies and rebalancing. Clients retain the right to place reasonable restrictions on the types of investments purchased in their accounts. All discretionary decisions will always be made in accordance with your pre-defined investment objectives, risk tolerance, and any agreed-upon restrictions.

Non-discretionary services are also available for clients who prefer to make all final investment decisions themselves, with our advice and recommendations.

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Item 17: Voting Client Securities

As a matter of policy and practice, Keychain Asset Management does not typically vote client proxies for securities held in client accounts. Clients will receive proxy materials directly from their custodian or a proxy solicitation firm and are responsible for voting their own proxies.

If you have questions about proxy voting, we encourage you to contact us.

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Item 18: Financial Information

As an Oregon-registered investment adviser, Keychain Asset Management is required to maintain a state solvency requirement. This is monitored through the submission of annual financial statements to the Oregon Division of Financial Regulation.

We are required to obtain and maintain a $10,000 surety bond in the state of Oregon.

We do not require pre-payment of fees of more than $500 per client, six months or more in advance.

Keychain Asset Management has not been involved in any financial condition that is likely to impair our ability to meet contractual commitments to clients. We have not been the subject of any bankruptcy petition.

Item 19: Brochure Supplement (for Brent Pearson)

This Brochure Supplement provides information about Brent Pearson, who serves as the Principal, Chief Compliance Officer, and Investment Adviser Representative of Keychain Asset Management. This information supplements the Keychain Asset Management Firm Brochure (Part 2A).

Item 1: Cover Page

- **Name:** Brent Pearson
- **Business Address:** 914 6th St Oregon City OR 97045
- **Business Phone Number:** 503-893-8385
- **Firm Name:** Keychain Corp, d/b/a Keychain Asset Management
- **Date:** July 8, 2025

Item 2: Educational Background and Business Experience

- **Year of Birth:** 1971
- **Formal Education After High School:**
    - Two years of study at Berklee College of Music
    - Bachelor's Degree from University of Arizona: Interdisciplinary Study - Computer Science, Electrical Engineering, and Music
- **Business Background for the Preceding Five Years:**
    - **Principal, Napa Logic, Inc.** (July 2014 – July 2025)
        - As Principal of this IT Consulting and Software Development firm, Brent Pearson successfully managed and operated the business. Key responsibilities included overseeing numerous FinTech software development projects, such as building a payroll and capital management system, and developing a B2C consumer debt relief program. This role involved significant experience in business operations, technology development, and financial systems.
    - **Relevant Investment Experience:** Brent Pearson has managed the 401k plan for Napa Logic, Inc. and has been involved in the cryptocurrency market

for over 10 years, with his first Bitcoin purchase occurring when the price was approximately $14. Additionally, Brent Pearson is the author of the book "*Understanding Bitcoin and Protecting Your Assets With Crypto: How to Secure Your Wealth in Any Financial Climate*." This experience provides a practical understanding of both traditional retirement planning and the digital asset landscape, further demonstrating expertise in the field.

Item 3: Disciplinary Information

Brent Pearson has no legal or disciplinary events that would be material to a client's evaluation of their integrity or ability to provide investment advice. This includes any criminal or civil regulatory actions.

You are encouraged to seek additional information about Brent Pearson on the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov.

Item 4: Other Business Activities

In addition to his role at Keychain Asset Management, Brent Pearson is the author of a book titled "*Understanding Bitcoin and Protecting Your Assets With Crypto: How to Secure Your Wealth in Any Financial Climate*." This book provides educational information on Bitcoin, cryptocurrency, and digital asset security.

Brent Pearson does not sell this book to clients or prospective clients of Keychain Asset Management. Instead, for educational purposes, Brent Pearson may provide complimentary copies of the book to clients or prospective clients. Any sales of the book, from which Brent Pearson derives compensation (royalties/sales), are made directly to the general public through retail channels such as Amazon, entirely separate from the investment advisory relationship.

While the book is educational in nature, clients should be aware of the following potential conflicts of interest:

- **Recommendation of Book:** Brent Pearson may provide his book to clients or prospective clients. Clients are under no obligation to accept or read the book.
- **Content Influence:** The content of the book reflects Brent Pearson's knowledge and views on digital assets, which may align with or influence the advice provided by Keychain Asset Management. However, all investment advice provided by Keychain Asset Management will always be based on the client's individual financial situation, objectives, and risk tolerance, and will be in their best interest.

All activities, including the authorship and distribution of the book, are conducted in a manner consistent with Keychain Asset Management's Code of Ethics and fiduciary duty to clients.

Item 5: Additional Compensation

Brent Pearson receives compensation (royalties/sales) from the authorship and sale of his book to the general public, as disclosed in Item 4. Aside from this, Brent Pearson does not receive any other economic benefit from any person other than Keychain Asset Management's clients for providing advisory services. This means no sales awards, prizes, bonuses based on sales, or client referrals from third parties. All compensation for advisory services is derived solely from the fees paid by clients to Keychain Asset Management, as disclosed in Item 5 of the Firm Brochure (Part 2A).

Item 6: Supervision

As the sole Investment Adviser Representative and Chief Compliance Officer of Keychain Asset Management, Brent Pearson is responsible for supervising their own advisory activities to ensure compliance with all applicable securities laws and the firm's policies and procedures. This includes:

- Regular self-review of client accounts and transactions.
- Adherence to the firm's Code of Ethics and Compliance Program Manual.
- Staying current with regulatory requirements and industry best practices through ongoing continuing education.

The overall responsibility for supervising the advisory activities of Keychain Asset Management rests with Brent Pearson, in their capacity as Chief Compliance Officer. He can be reached at 503-893-8385.

Privacy Policy

Effective Date: July 1, 2025

At Keychain Asset Management (the "Firm"), we understand the importance of protecting your privacy and the confidentiality of your personal and financial information. As an Oregon-registered investment adviser, we are committed to maintaining the highest standards of integrity and trust in all our relationships. This Privacy Policy outlines how we collect, use, share, and protect your non-public personal information.

This policy applies to individuals who obtain financial products or services from us for personal, family, or household purposes.

I. Information We Collect

We collect non-public personal information about you from the following sources:

- **Information You Provide to Us:** This includes information we receive from you on applications, forms, agreements, and other documents, whether written or electronic. Examples include your name, address, social security number, date of birth, financial circumstances, investment objectives, risk tolerance, and information about your digital asset holdings and activities.
- **Information About Your Transactions:** This includes information about your transactions with us, our affiliates, or others. Examples include your account balances, transaction history, investment activity, and payment information.
- **Information from Third Parties:** This may include information from custodians, broker-dealers, digital asset exchanges, consumer reporting agencies, or other service providers, as necessary to provide our services or to comply with legal obligations.

II. How We Use Your Information

We use your non-public personal information to:

- Provide you with investment advisory services, including financial planning, wealth management, and digital asset portfolio management.
- Process your transactions and manage your accounts.

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- Communicate with you about your accounts, services, and other relevant information.
- Comply with legal and regulatory requirements, including anti-money laundering (AML) laws and reporting obligations.
- Personalize and improve our services to better meet your needs.
- Perform internal business operations, such as auditing, data analysis, and research.

III. Information We Share

Keychain Asset Management **does not sell or rent your non-public personal information to anyone.**

We may share your non-public personal information with the following types of non-affiliated third parties, but only as necessary to provide our services, operate our business, or as required by law:

- **Service Providers:** We may share information with non-affiliated companies that perform services on our behalf, such as custodians (e.g., BitGo, Charles Schwab & Co., Inc.), broker-dealers, portfolio management software providers, financial planning software providers, and technology support providers. These service providers are contractually obligated to keep your information confidential and to use it only for the purposes for which we disclose it to them.
- **Legal and Regulatory Authorities:** We may disclose your information to government agencies, regulatory bodies (e.g., SEC, Oregon Division of Financial Regulation), or law enforcement officials when required or permitted by law, such as in response to a subpoena, court order, or regulatory inquiry, or to protect our rights or property.
- **Other Permitted Disclosures:** We may also disclose your information with your express consent or as otherwise permitted or required by applicable law.

IV. How We Protect Your Information

We are committed to protecting the security and confidentiality of your non-public personal information. We maintain physical, electronic, and procedural safeguards designed to:

- Protect against unauthorized access to or use of your information.

- Ensure the security and integrity of our systems and data.
- Restrict access to your non-public personal information to only those employees, contractors, and service providers who need to know that information to provide services to you.
- Train our personnel on the importance of confidentiality and privacy.

Our cybersecurity and data privacy policies include measures such as:

- Secure storage of electronic and physical client records.
- Robust access controls and authentication procedures.
- Use of firewalls, antivirus software, and encryption technologies.
- Regular security updates and vulnerability assessments.
- Data backup and recovery procedures.
- An incident response plan to address potential data breaches.

V. Accuracy of Your Information

We strive to maintain accurate and up-to-date client information. We encourage you to review any statements or reports we provide and to notify us promptly of any changes to your personal information (e.g., address, phone number, email).

VI. Opt-Out Rights

Because we do not share your non-public personal information with non-affiliated third parties for their marketing purposes, there is no opt-out right for such sharing.

If we were to engage in future sharing of your information with non-affiliated third parties for purposes other than those necessary to provide our services or as required by law, we would provide you with a clear and conspicuous notice and the opportunity to opt-out of such sharing, as required by law.

VII. Changes to Our Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. When we make material changes, we will provide you with a revised Privacy Policy notice and/or post the updated policy on our website. We encourage you to review this policy periodically.

VIII. Contact Information

If you have any questions or concerns about our Privacy Policy or the handling of your non-public personal information, please do not hesitate to contact us:

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Phone: 503-893-8385
Email: compliance@keychainassets.com