Silo Financial LLC

Privacy Policy

Silo Financial LLC (“Silo”) is committed to protecting your privacy and the security of your information. This privacy policy outlines what Silo Financial LLC (“Silo,” “we,” “our,” or “us”) collects, how we use and share it, and how we protect it when you use our websites and mobile apps (the “Services”). Silo is an SEC-registered investment adviser. Silo’s affiliates are Silo Markets Inc. (our parent company); Silo Rewards LLC, which operates the optional Silo Rewards Program; and Silo Securities LLC, which has applied to register as a broker/dealer. Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at support@silomarkets.com or submit a ticket through the Silo platform.

Version Date: October 20, 2026

Table of Contents

1. What Information Do We Collect?
2. How Do We Use Your Information?
3. When and With Whom Do We Share Your Personal Information?
4. How Long Do We Keep Your Information?
5. Do We Collect Information From Minors?
6. What Are Your Privacy Choices?
7. Do California Residents Have Specific Privacy Rights?
8. Do We Make Updates to This Notice?
9. How Can You Contact Us About This Notice?
10. How Do We Protect Your Information?

What Information Do We Collect?

As part of operating the Silo Platform, we collect certain information that we classify here as "Personal Information". The two main ways that we collect information are through your voluntary disclosure or automatically through your usage.

Personal Information you disclose to us

We collect personal information that you voluntarily provide to us when you register on Silo, whether you use the application or through our website. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information. The information collected is sorted below. We will reference the categories of information listed below in further sections detailing how we use this information.

Identity Data, such as your name, date of birth, marital status, biometric identifiers (such as a "selfie" photo used to verify your identity), and other data on government-issued identification documents;

Contact Data, such as your email address, billing/mailing address, and telephone number;

Financial Data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;

Profile Data, such as your username and password;

Rewards Data, such as your Silo Rewards plan, Membership Generation, subscription payments, points earned and redeemed, referral activity, and loyalty program numbers you provide to transfer points to travel partners;

Financial Preference Data, such as your suitability score outcomes, your interests, preferences, feedback, and survey responses;

Security Data, such as IP addresses, device information, and geo-location data;

Stored Content, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission when necessary for further documentation; and

Additional Data You Provide, such as via focus groups, survey responses, contests/sweepstakes, customer support, or other means.

Information automatically collected

Similar to other apps, Silo collects information about you automatically when you use our platforms.

Usage Information: We collect information about your activity on our Services, which includes IP address, browser and device characteristics, operating system, device name, country, location, and other technical information.

App Activity Information: When you perform activities on our platform such as creating an account, linking bank accounts, fund transfers, orders for stocks, ETFs, bonds, and mutual funds, and Silo Rewards activity such as earning and redeeming points, we collect information about the nature of the activity you engaged in, data about the activity such as amount and timestamp, and other relevant information to enable the facilitation of the activity as well as record it for your reference.

Third-Party Information: When you interact with our communications such as email campaigns, surveys, or other promotional activity, we collect information about deliverability, user engagement, and other forms of analytics through third-party providers like Twilio SendGrid or Google Analytics.

This automatically collected information does not reveal your specific identity (like your name or contact information) and is primarily needed to maintain the security and operation of our services. Silo also uses third-party providers such as Google Analytics to assess the usage and interactivity of our website and app.

How Do We Use Your Information?

Silo uses your personal information to deliver, personalize, operate, improve, create, and develop our Services to provide you with a secure, smooth, efficient, and customized experience as you use them, and for legal compliance, loss prevention, and anti-fraud purposes. Silo will never sell information provided by users to third parties for compensation.

Data necessary to fulfill obligations with our customers

Demo Account Program – Silo collects and utilizes “Contact Data”, “Security Data”, and “Identity Data” to enable the creation of demo accounts. This includes a name, email, and password, as well as device identifiers. Demo accounts are used to browse and explore the platform.

Account Creation – Silo collects and utilizes “Identity Data”, “Contact Data”, and “Financial Data” to create a customer experience that allows users to seamlessly operate on our platform. A substantial amount of this data is entered when a user initially creates an account on our app.

Order Transmission – Silo is not a broker/dealer. When you place an order on the platform, Silo transmits the order, along with the account information needed to process it, to our custodian, Interactive Brokers LLC, through its application programming interface (API).

Investment Advisory Services – Silo uses the “Financial Data” and “Financial Preference Data” you provide to generate suitability scores for the securities on our self-directed platform. Suitability scores are informational only; Silo does not manage portfolios or make investment decisions for you.

Silo Rewards Program – If you enroll in the optional Silo Rewards Program, Silo shares your account type, eligible balances, and related account data with our affiliate Silo Rewards LLC so it can calculate points, process subscription payments, and administer referral and promotional programs. When you transfer points to a travel or loyalty partner, your name and loyalty program number are shared with that partner and its processors to complete the transfer.

Customer Support – Silo will occasionally use “Identity Data”, “Security Data”, and “Contact Data” to provide customer support. Requests for support submitted through our platform will be collected and attended to using customer data.

Platform Improvement – Silo could utilize “Security Data” and customer information to garner and assess analytics regarding customer usage. Silo utilizes customer data to monitor customer engagement and identify areas of improvement in user experience.

Communication and Promotions – Silo and our affiliate Silo Rewards LLC may use “Contact Data” to send communications to our users and prospective users regarding product launches, new feature updates, and promotional campaigns. These methods are used primarily for marketing purposes. Promotions such as client referrals and incentives to leave reviews on the iOS App Store are examples of promotions in which contact data would be used to identify and contact individuals that are being referred and to establish a link with the referrer and referee.

Data necessary to adhere to legal standards by state and federal agencies

As a registered advisory firm, Silo is subject to laws and regulations that require us to collect, use, and store your personal information. Our duty to adhere to the regulatory requirements motivates our detailed account creation process.

Identity Verification – Silo collects customer identification data, “Identity Data”, to comply with relevant anti-money laundering (AML) laws. Identification data is sent to Interactive Brokers as part of its customer identification program (CIP). This process might require you to provide a “selfie” along with your already provided government-issued identification.

Eligibility – To be eligible to use our platform to trade securities, Silo as well as relevant government agencies require users to be permanent U.S. residents who are at least 18 years of age. Silo collects customer data in an effort to comply with the eligibility requirements of our regulatory framework.

Compliance – Under the Investment Advisers Act of 1940 and SEC Rule 204-2, Silo is required to retain customer records involving account information, correspondence, statements, and other records, generally for at least five years.

Data use based on customer consent

Device-based information – Silo collects device-based information such as geo-location, browsing activity, or device identifiers to authenticate users when they enter and use the platform.

Notification-based communication – Customers can opt in to message or email-based communications to receive notifications regarding order information, promotional campaigns, and account changes.

When and With Whom Do We Share Your Personal Information?

Silo may share your personal information with our third-party service providers in an effort to deliver on our fiduciary and contractual obligations. Said information could be transferred between services, companies, and our employees in the process of fulfilling our customer responsibilities. Data entered into our platform is stored with third-party hosting providers. Orders you place are transmitted to our custodian, Interactive Brokers LLC, which executes, settles, and holds your trades and assets. We also share information with our affiliates as described in this policy, including Silo Rewards LLC to administer the Silo Rewards Program and, if its registration is approved, Silo Securities LLC as introducing broker for your account.

Information about your device, location, passwords, email addresses, and phone number may be shared with third parties that engage in authentication services. These parties are engaged to ensure Silo is providing a secure platform which users interact with.

Silo also uses third-party advertising and analytics services, namely “Google Ads” and “Google Analytics” (includes all analytics platforms provided by Google). For information about how Google uses information from platforms affiliated with Silo, see https://policies.google.com/technologies/partner-sites. Silo also uses third-party services that utilize Google’s and Microsoft’s email APIs to provide data related to users’ interactivity with Silo correspondence and promotional material.

Information about you could be disclosed to any exchange, clearing, or settlement system that is in connection with trades you make on our platform. Participants such as dealers, custodians, and other intermediaries associated with transacting your securities could come across your data.

Silo will disclose information about you if we believe that this disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of Silo, our users, or the public.

We do not share your nonpublic personal information with nonaffiliated third parties except as permitted by law, such as with service providers that help us operate our Services, with our custodian and others needed to process your transactions, with your consent, or as required by law. Because we share only as permitted by these exceptions, federal law does not require us to offer you an opt-out for this sharing. If you join through a referral program, we may let the referring client or promoter know that you opened an account so their reward can be issued.

How Long Do We Keep Your Information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy. Retention periods for investment advisers are dictated by regulation. We generally retain account records for the life of your account and for at least five years after it is closed, or longer where required by law. When our business need for your specific information is gone, we will either delete or anonymize such information. Information stored in backups is isolated and deleted on our regular backup deletion schedule. Analytics data provided by Google Analytics is not tied to a user’s identity and therefore is intrinsically anonymous.

Do We Collect Information From Minors?

We do not knowingly collect data from or solicit any information from children under 18 years of age. By using our platform, you represent that you are at least 18 years of age. At this time, none of our product offerings allow custodial access or in any other way facilitate the use of our platform by minors. In the event we learn that we have unknowingly collected information from a person under the age of 18, we will take action to delete such information. Please contact support@silomarkets.com if you believe we have any information from a minor.

What Are Your Privacy Choices?

Account

Clients may update certain profile information through the app. Communication preferences include email, messages, and notification preferences. Information we need to open and maintain your account, process your transactions, and comply with the law cannot be limited.

Opt-Out Capabilities and Controls

Customers can choose to opt out of certain parts of the user experience.

Communications: For emails and messages that include promotional content, users can click the “unsubscribe” link or text STOP to our messaging avenues. This does not apply to communication relevant to your account such as trade confirmations, account status, statements, security notices, and other necessary correspondence.

Device data: You may use your device’s settings page to disallow Silo from accessing information such as your contact list or camera roll.

Data Sharing: Silo does not sell user activity data to third parties. Providers such as Google use customer data for services including but not limited to: Firebase Authentication, Firestore, Firebase Messaging, Firebase Analytics, Google Analytics, and Google Ads. Device information and location could be collected while you are interacting with our platform. Third-party providers are used to authenticate user sessions and therefore require access to “Security Data”.

Affiliate Marketing: Silo Rewards LLC may use information it receives from Silo, such as your account type and balances, to market its products and services to you. You may opt out of this marketing at any time by emailing support@silomarkets.com. Your choice will remain in effect until you tell us otherwise.

Cookie Controls and Trackers: Web browsers often accept cookies and similar tracking technologies by default. To change cookie preferences, you can configure the browser of your choice to reject tracking. Additionally, you may visit your email’s settings page to view and configure images to “Ask before displaying external images”.

Do California Residents Have Specific Privacy Rights?

Most of the information we collect about our clients is subject to the federal Gramm-Leach-Bliley Act and is therefore exempt from the California Consumer Privacy Act (“CCPA”). For other

personal information, such as website and app usage data, California residents may have the right to know what personal information we collect, use, and disclose; to request deletion or correction of that information; and to opt out of the “sale” or “sharing” of personal information for cross-context behavioral advertising. Silo does not sell your personal information for money. Our use of advertising and analytics tools such as Google Ads may be considered “sharing” under the CCPA, and you may opt out by contacting us as described below. We will not discriminate against you for exercising these rights.

California residents may request information about the Personal Information we have collected in the 12 months preceding the request. As noted above, users may request the deletion of information that we collect. However, due to our legal obligations, some information cannot be erased and therefore requests might not always be accommodated. Please submit a ticket through the app or email privacy@silomarkets.com to initiate a request for information.

Do We Make Updates to This Notice?

This privacy policy will be updated to stay compliant with the latest regulations regarding customer privacy. Updates will also be made when changes to our business that affect privacy occur, such as new features, new platforms, or new forms of outreach. If a customer’s privacy is at any point affected by the operations of our firm, we will make changes to the Privacy Policy. We recommend that you review our Policy on a regular basis as you continue to use our services. Users can find the latest revision by referring to the “Version Date”. We will notify you of material changes to this Policy, and we will provide you with a revised notice, and any opt-out right required by law, before we share your information in any new way that requires one.

How Can You Contact Us About This Notice?

If you have questions or comments about this notice, you may email us at support@silomarkets.com or submit a request ticket. Tickets can be made through the Silo app.

How Do We Protect Your Information?

We maintain administrative, technical, and physical safeguards designed to protect your information, including encryption, access controls, and oversight of our service providers, and we dispose of customer information securely. If sensitive customer information is, or is reasonably likely to have been, accessed or used without authorization, we will notify affected customers as required by law, generally within 30 days of becoming aware of the incident.