

Item 1 – Cover Page



Santander Securities LLC  
2 Morrissey Boulevard  
Dorchester, MA  
[www.santandersecurities.com](http://www.santandersecurities.com)  
Firm Brochure

Digital Advisory Wrap Fee Program

**March 31, 2023**

This wrap fee brochure (the “Brochure”) provides information about the qualifications and business practices of Santander Securities LLC (hereinafter “SLLC” or the “Firm”). If you have any questions about the contents of this Brochure, please contact SLLC at (866) 736-6475. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

SLLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information to help you determine whether to hire or retain an adviser.

Additional information about SLLC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using our name “Santander Securities LLC” or by a unique identifying number known as a “CRD number”, SLLC’s CRD number is 41791.

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## **Item 2 - Material Changes**

SLLC encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with your Financial Advisor.

The Firm has made regular and routine updates to this Brochure since our last annual update that took place in March of 2022. The Firm has provided additional information and transparency regarding Item 6 “Portfolio manager selection and evaluation”, Item 7 “Client information provided to Portfolio managers”, and Item 8 “Client contact with Portfolio managers”. Although the information in the Brochure is materially the same as our last revision, the Firm has reformatted this Brochure to better harmonize with the requirements of a wrap fee Brochure.

### **Will I receive a Brochure every year?**

We may, at any time, update this Brochure. Future Brochures will address material changes, if any, that we have incorporated into the Brochure since it was last delivered to you or since this Brochure was last posted on the above-referenced SEC website.

### **May I request additional copies of the Brochure?**

You may request and receive additional copies of this Brochure in one of three ways:

- Download the Brochure from the SEC website at: <http://www.adviserinfo.sec.gov/>. Select “Firm” and type in our Firm name or CRD # 41791.
- Contact SLLC’s Customer Service Department at: (866) 736-6475 to request a Brochure free of charge.
- Visit our website at:  
<https://www.santanderbank.com/personal/investing-insurance/investment-services/disclosures>

### **Throughout this entire Brochure I am advised to review the ADV Brochure(s) of various Portfolio Managers and Programs, how do I accomplish this?**

You can access all Brochures from the SEC Website at: <http://www.adviserinfo.sec.gov/> . Select “Firm” and then type in the name of the Firm or Portfolio Manager you are looking for. Your Financial Advisor can help you with this process, please contact them with any questions. Additionally, these Brochures will be provided to you before or at the time you establish an Advisory Program with the Firm.

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#### **Item 4 – Services, Fees and Compensation**

Santander Securities LLC (hereinafter “SLLC” or the “Firm”) is a financial services firm that provides various investment advisory services to Clients. SLLC registered with the United States Securities and Exchange Commission (hereinafter, the “SEC”) as an investment adviser in November 1999 and has been registered with the SEC and the Financial Industry Regulatory Authority (hereinafter “FINRA”) as a broker-dealer since 1996. SLLC is a wholly-owned subsidiary of Santander Holdings USA, Inc., a holding company for Santander Bank, NA that provides various banking products and services primarily in the Mid-Atlantic and Northeastern United States. Santander Holdings USA, Inc. is a subsidiary of Banco Santander, S.A. SLLC’s advisory services are offered through certain SLLC Financial Advisors also referred to as Advisors who have registered as investment adviser representatives. Registration does not imply a certain level of skill or training. Other material affiliates of SLLC include Santander Bank N.A., and Banco Santander International. However, as part of the Santander Group, SLLC is affiliated with numerous other entities throughout several different companies. Please refer to “Item 9” of this Brochure for information on affiliated entities with which SLLC has material relationships and the method in which SLLC manages certain conflicts that arise in such relationships.

SLLC provides various investment advisory services to our Clients, which includes access to a wrap fee Advisory Program (“Advisory Program”) that has the following offerings, Fund Strategist Portfolios (“FSP Program”), Unified Managed Accounts (“UMA Program”) and Separately Managed Accounts (“SMA Program”) co-sponsored by Fidelity Institutional Wealth Adviser LLC (“FIWA”) an unaffiliated investment adviser, using the Fidelity Managed Account Xchange Platform (“FMAX” or “Platform Manager” or “Platform”). Appointed Portfolio Managers (“Managers”) available on Platform manage their respective model Portfolios and strategies in efforts to achieve the objectives of the specific Program. Please refer to the separate FIWA, FMAX and/or Portfolio Managers ADV Brochures for more details about our Advisory Program offerings and associated costs and fees.

Additionally, SLLC provides our Clients access to a Digital Advisory wrap fee Program (“Digital Advisory Program”), also known as a “Robo Advisor”, which is explained in this Brochure.

In addition to our Advisory Program and Digital Advisory Program, the Firm offers securities-based consumer lending, tax impact and overlay services and financial planning to our wrap fee Clients. The products and services we offer are limited to certain Advisory Programs and options we have selected based on our due diligence, third-party due diligence, and certain approved and/or qualified list(s) provided and monitored by both FMAX and SigFig. As such, products and Advisory Programs available to you should be considered to be limited.

#### Digital Advisory Program

The Digital Advisory Program which will be offered to our Clients under the name/branding of “Santander PathFinder”, is a wrap fee online investment Advisory Program through which Clients are provided investment recommendations in the form of model Portfolios (“Portfolio”) and discretionary investment management of the assets held in Clients’ advisory accounts (each, an

“Account”) within the selected model. We offer and provide access to the Digital Advisory Program co-sponsored by and through an agreement with SigFig Wealth Management LLC (“SigFig” or “Program Manager” or “Portfolio Manager”), an independent investment adviser that is not affiliated with us. SigFig provides services through the Digital Advisory Program, which includes the implementation of the model Portfolios recommended under the Program, using their technology. SigFig or in some cases their appointed Portfolio Managers will manage models composed of Exchange Traded Funds (“ETFs”) that are designed to align with our Clients risks and objectives. These models will range from conservative to aggressive and provide our Clients with investment solutions that will align with their specific risk tolerance and objectives. Clients and prospective Clients will receive, and should review, a copy of SigFig’s ADV Brochure, Form CRS and Privacy Policy, which contain additional information regarding SigFig’s services, processes, policies, and conflicts of interests.

Clients and prospective Clients should understand that the Digital Advisory Program is a digital offering and that our primary method of communicating with Clients and providing Clients investment advice will be through the Digital Advisory Program website, mobile applications or other digital interfaces that we may make available from time-to-time (collectively referred to as the “Site”). Since the objective of a digital offering is for our Clients to use the Program Site and technology to invest, the Firm does not assign you a Financial Advisor for your Digital Advisory Program Account. SLLC will make available our customer service desk, Santander Investments Direct or (“SID”) to assist our Clients with any questions on how to use the Program’s Site. Additionally, our SID desk is composed of licensed Advisors, they will be able to assist you with any questions about your Digital Advisory Program Account or any Advisory Program Account you maintain with SLLC. Please note, there is no additional charge or fee accessed to you if you use our SID desk for help or advice.

In order to participate in the Digital Advisory Program, Clients must open an account with SLLC as introducing broker-dealer, who will clear all transactions through National Financial Services LLC (“NFS” or the “Program Custodian”) as executing broker on a fully disclosed basis. SLLC has a conflict of interest to structure the Program where it serves as both adviser and introducing broker-dealer, and you may pay more to use our advisory services and/or brokerage services than you would with another Firm or service provider.

The Digital Advisory Program uses SigFig’s proprietary investment Algorithms (the “Algorithms”), to recommend a model Portfolio, to manage individual Client’s digital investment advisory accounts and to provide certain services as described in this Brochure, including: for the purpose of determining the model Portfolio to recommend to each Client based on the information provided in such Client’s risk tolerance questionnaire (“RTQ”); for the purpose of providing instructions for execution of transactions in each Client’s Account; to monitor Accounts regularly to determine whether to rebalance based on parameters determined by SLLC in its sole discretion (current drift parameters vary based on the percentage of the model Portfolio that a particular asset represents); at a Client’s election and for tax-loss harvesting purposes.

SigFig’s investment advisory personnel oversee the operation of the Algorithms and will report to SLLC on a regular basis and participate in our “Fiduciary Oversight and Conflicts of Interest

Committee”. In addition, the Firm will periodically review the Algorithm to ensure its output is as desired and that recommendations made to our Clients are prudent and consistent with their desired objectives.

SigFig also offers a tax-loss harvesting feature within the Digital Advisory Program in which Clients may elect to participate, whereby SigFig will use the Algorithms to analyze tax-loss harvesting opportunities (such as gain and loss management) and wash sale management. Clients, and not SLLC, are responsible for any tax consequences or tax or filing obligations resulting from their decision to enroll in the Digital Advisory Program and from their election of tax-loss harvesting, if applicable. The Digital Advisory Program’s tax-loss harvesting feature does not provide a comprehensive tax management solution. SLLC and SigFig do not provide tax advice; Clients should consult their tax advisor prior to making any decisions that may affect their tax obligations.

Clients have the option of accepting the Portfolio recommended by the Algorithms or completing the RTQ again (in which case, if we assess such Client’s risk tolerance to be sufficiently different based on the new responses to the RTQ, we will recommend a different Portfolio). Clients should understand that completing the RTQ again for the purpose of receiving a different Portfolio recommendation, or otherwise providing information in the RTQ that is not accurate or complete with respect to their actual circumstances, may result in the recommendation of a Portfolio that is not risk appropriate for such Client. The Firm discourages Clients from this practice and has no liability should any Client willfully provide financial information that is materially incorrect.

Establishing an advisory relationship with SLLC through the Digital Advisory Program involves the following steps:

Through the Site, a Client completes an RTQ, developed by SigFig and approved and modified by us, to identify his or her needs and objectives, investment time horizon, risk tolerance and other pertinent information.

SigFig uses the information compiled in the RTQ regarding the Client’s age, time horizon, income, liquid assets, estimated percentage of household income that such Client saves, and risk tolerance to select a risk appropriate Portfolio.

Once the Client approves the Portfolio, he or she will sign (*“e-sign”, you agree this has the same legal effect as signing a paper version of this agreement when you establish and accept your agreement, additionally this captures your consent to receive all account documentation, including but not limited to confirms, statements, ADVs and other disclosures via electronic delivery and/or by accessing the program site*) an investment advisory agreement with SLLC which evidences his or her approval of the selected Portfolio and grants investment discretion and discretionary trading authority over his or her Account to SLLC (and, through SLLC, to SigFig).

In order to participate in the Digital Advisory Program, each Client will enter into a separate brokerage customer agreement for SLLC to act as introducing broker-dealer for all transactions within that Client’s Account. Please refer to “Brokerage Practices” below for

additional information.

SigFig and SLLC currently provide investment advice only with respect to ETFs (“Securities”) and make available a tax-loss harvesting feature.

After a Client has established his or her Account, the assets in such Account will be managed on a discretionary basis in accordance with such Client’s selected Portfolio.

In order to permit sufficient time to ensure that the transfer of assets into your Account has been successfully completed by the financial institution that maintains your bank or brokerage account and complete any other required processing, there may be a short delay of typically no more than a few business days between the time that the applicable deposit is credited to your Account and the time when investments are made within your Account. Clients should therefore understand that each deposit or transfer made will generally not be invested in the Client’s Portfolio immediately, and that such uninvested cash will not be subject to financial gains or losses resulting from movement in market prices.

Accounts and Portfolios underlying the Digital Advisory Program are managed on a discretionary basis. Clients may, however, impose reasonable investment restrictions on the management of their Accounts by sending SLLC a written request. The determination as to whether a requested investment restriction is reasonable is solely that of SLLC, SigFig or appointed Managers. If a Client’s request is deemed to be unreasonable, or if we determine that a previous restriction has become unreasonable, we will notify the Client that unless the instructions are modified, we may reject or terminate the Account.

#### Important Considerations Prior to Opening an Account

The list below is meant to provide you with general overviews of several important facts that are common with the advisory programs that we offer. While the list below is not meant to include every possible situation, we do consider and take into account the following:

- Reasonable Restrictions

By sending us a written request, you may impose reasonable restrictions on the management of your account. For example, a reasonable restriction may indicate your desire that we recommend that SigFig does not invest in a certain sector or industry. We may refuse to accept or manage your account if we determine such restrictions are unreasonable. If we are unable to accept your restriction, we will give you the opportunity to modify or withdraw the restriction.

- Deposits and/or Withdrawals

Unless specifically stated, Clients can make additions to or withdrawals from the Account at any time. If your Account falls below the minimum required Account value, This can be due to both market volatility or withdrawals directed by the Client, we have the right to terminate your Account with written notice.

- Trading Authorization & Discretion

Certain advisory solutions like the Digital Advisory Program, grant SLLC and SigFig the ability to exercise discretion; the assets in such Account will be managed on a discretionary basis in accordance with such Client's Portfolio.

- Custody

The Firm only has custody as you have granted us authorization to deduct advisory fees from your account. Additionally, the Firm does not have possession of and will never ask for your Program Site credentials. The Firm would like you to know that we do not take "custody" of your money and/or your securities. If the Firm inadvertently receives a check made payable to the Firm or receives securities, we will make every effort to return them to you promptly without delay.

- Trade Confirmations

You will receive electronic trade confirmations for each transaction executed in your Account, unless you notify us you only wish to receive quarterly trade confirmations.

- Quarterly Statements

You will receive a statement of your Account and account activity no less than quarterly. If you have any questions regarding the performance of your account, please contact SLLC at (866) 736-6475.

- Cash Sweep Account

SLLC and NFS, the Program Custodian, have entered into an agreement whereby NFS automatically invests or "sweeps" available cash balances in certain Clients' Accounts at NFS into a program selected by the Client should they choose to participate. Clients have an opportunity to earn interests on balances that participate in sweep programs. Currently, the Firm offers our Clients a sweep option on our advisory platform; the **Fidelity Government Money Market Fund (SPAXX)**. SLLC receives no remuneration for your participation in these investments. In addition, it is the intent of the Firm, to only invest our Clients in sweep investments that do not generate additional fees known as 12b-1 fees. This offering does not generate 12b-1 fees. No additional fees will be charged to you or earned by SLLC for your participation in sweep investments. You could lose money by investing in the fund. Although the fund seeks to preserve the value of your investment at \$1.00 per share, it cannot guarantee it will do so. **An investment in the fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency.** The interest rates you earn may be lower than interest rates available should you invest directly in other products or with other institutions; please consult the product prospectus and/or terms and conditions document for additional information.

- Annual Meetings

The Digital Advisory Program is designed to be used by a Client through the Site, and as such



SigFig, no less than annually, will send each Client an electronic notice to gather current information. On an annual basis, SigFig contacts Clients on our behalf to review and update the previously provided answers to the RTQ. The intent of this process is to ensure (i) the current Digital Advisory Program account Portfolio still harmonizes with the Client's financial needs and objectives; (ii) should a new solution be recommended to better align with the Client's current financial conditions; and, (iii) should the Client have any reasonable restrictions they wish to modify or impose. Clients may also receive periodic email communications describing Portfolio performance, account information and reminders to review their personal risk profile previously provided. In addition to the annual meeting, not less than four times a year, the Firm will provide you with written notice (usually in the form of an account statement message) that we always endeavor to make the Firm reasonable available to you, to answer any questions you may have about your account or the services we provide. Also, the Firm reminds you of your right to impose or modify any reasonable restrictions you may wish to impose on your account.

- Trading Errors

Please understand, should a trading error occur in your account the Firm will correct any error and bear any cost(s) associated with doing so. Should correcting an error result in a profit or gain, the Firm will retain the gain in a Firm account. It is the goal of the Firm that your account be traded as intended.

- On-Going Client Obligations and Notifications

Clients are responsible for updating their profile and notifying us through the Site in the event there are changes in a Client's financial or demographic information or financial goals, or any other information provided in the RTQ, so that we can help each Client assess whether the Portfolio is still appropriate for the Client. In any event, we will contact each Client electronically at least once annually to review and retake the RTQ, If necessary, and capture any changes in their financial circumstances and whether the Client wishes to impose reasonable restrictions on the management of his or her account or wishes to reasonably modify existing restrictions. Should a Client have any questions, we will make our customer service desk available to the Client upon request.

As of December 31, 2022, SLLC had approximately \$ 939,713.00 in the Digital Advisory Program.

### Fees

For services provided under the Digital Advisory Program, **Clients pay an annual asset-based fee ("Program Fee") calculated and charged on a monthly basis in arrears of 0.50%**. The Program Fee includes the advisory services provided by SLLC and SigFig, including asset allocation recommendations, performance reports, periodic rebalancing of Accounts, document processing, information systems and other administrative services, as well as brokerage, custodial and administrative services provided by the Program Custodian. SLLC pays a portion of the Program Fee to SigFig, this is detailed further in the compensation section of the Brochure. Additionally, Program Fees can be negotiated, SLLC reserves the right to discount or waive any fees associated with the Program at its sole discretion.

In addition to the Program Fee, Clients will incur certain other charges and expenses. These costs are in addition to the Program Fee. Please see “Costs Not Covered by the Program Fee” below for additional information.

The initial Program Fee will be calculated and debited at the beginning of the calendar month following the month in which the initial investment is made. The initial Program Fee for any partial calendar month will be pro-rated based on the number of calendar days in the partial month. After the initial payment period, the Program Fee will be calculated at the beginning of each calendar month, based on the value of the Account on the last business day of the prior calendar month.

SigFig will calculate the applicable Program Fee and provide the amount due to the Program Custodian. The Program Custodian will automatically deduct the amount due from a Client’s Account. The Account typically holds sufficient cash in each Portfolio to cover the Program Fee. To the extent that there is not sufficient cash in the Account, a security or securities will generally be sold to pay the Program Fee and restore the cash allocation in the Portfolio.

When you consider the Digital Advisory Program and compare it to other Firm advisory programs and account types, including with respect to their relative costs, you should consider various factors, including but not limited to:

- Your preference for an investment advisory or brokerage relationship;
- Your preference for a discretionary or a non-discretionary relationship;
- Your preference for a fee-based or commission-based relationship;
- Do you prefer a technology driven investment experience without direct or regular guidance of a Financial Advisor;
- The types of investment vehicles available in the Digital Advisory Program, and whether you wish to invest in collective investment vehicles that are not available in the Digital Advisory Program, such as individual mutual funds or annuities; and
- The scope of ancillary services that may be available to you in a brokerage account or in another advisory program, which are not available in the Digital Advisory Program.

### Compensation

The Program Fee charged to you is .50%, this is a flat fee and remains static, it does not increase or decrease with the amount of your investment. **The Firm pays SigFig .08% of the Program Fee for the platform services they provide and .03% of the Program Fee to NFS, your Program Custodian for customary custodial services.** After paying a portion of the Program Fee to SigFig and NFS, the Firm retains the remainder of the fee as compensation. Clients should be aware that the compensation to SLLC will differ according to the specific Advisory Program chosen. SLLC has a financial incentive to drive Clients to invest in Programs that will pay us more. Compensation to your Financial Advisor will be level no matter what Advisory Program is chosen, mitigating conflicts of interest based on the solution they recommend. The compensation to SLLC or the Firm may be more than the amounts we would otherwise receive if you participated in another Program or paid for investment advice, brokerage, and/or other like services separately. We urge you to discuss compensation with your Financial Advisor in order to gain full transparency on how

he/she is compensated and discuss all present conflicts of interest. Further, please be mindful that similar services or products may be available at other institutions at a lower cost.

To be clear, when our Financial Advisors recommend a wrap-fee Program to you, they are compensated when you open an account. In some cases, they could be compensated more than if they recommended other services, Programs or investments offered by the Firm. Additionally, you could pay more for a wrap-fee Advisory Program than if you purchased other programs or paid separately for investment advice, brokerage, and other services. Also, the Firm stands to make more compensation in harmony with the size of your investment, so we are conflicted and incentivized to direct you to increase your investment. As an example, .50% of \$100,000 is an annual cost to you of \$5000, .50% of \$1,000,000 is an annual cost to you of \$50,000. The larger the investment, the more you pay and the more the Firm stands to make as compensation. The material reportable conflicts of interest encountered by a Client include, but are not limited to, those discussed throughout this brochure.

#### Program Choice Conflict of Interest

Clients should be aware that SLLC offers a variety of advisory programs (including the Digital Advisory Program) and the compensation to SLLC will differ according to the specific program, service, or product selected. The compensation received by SLLC for your participation in the Digital Advisory Program may be more than the amounts we would otherwise receive if you participated in another advisory program or paid for investment advice, brokerage, and/or other like services separately. Further, please be mindful that similar services or products may be available at other institutions at a lower cost. Additionally, Program Fees can be negotiated, SLLC reserves the right to discount or waive any fees associated with the Program at its sole discretion.

Please understand, the Firm does not consider the cost of any advisory program when a recommendation is made. The cost to you, and the compensation to the Firm will differ if you select our Digital Advisory Program, an FSP, UMA or an SMA Program. The different cost of each program is not a consideration when the Firm recommends an appropriate investment to match your objectives and financial needs. Please speak to your Financial Advisor should you want to discuss the different costs for each Program.

Additionally, other Advisory programs we offer may provide our Clients with additional advisory services such as financial planning at no additional cost and access to a dedicated Financial Advisor. You may contact us at any time to request these services, our SID desk will align you with a Financial Advisor to discuss your financial profile, goals and objectives. Please visit and review our website for additional disclosure forms that compliment this brochure such as: Form CRS; Conflicts of Interest Disclosure; and our Compensation Disclosure. These disclosures provide transparency into the services we provide, present conflicts of interest, and how the Firm and our Financial Advisors are compensated in both the capacity as an “Adviser” and as a “broker-dealer” which is a conflict of interest.

<https://www.santanderbank.com/personal/investing-insurance/investment-services/disclosures>

### Costs Not Covered by the Program Fee

The Program Fee does not include the costs of certain ancillary services charged to you by the Program Custodian, including regulatory fees, fees for ACAT exits, returned checks, stop payment requests, research, and small Account balances, as well as wire fees and certain fees relating to use of the mail, including postage and handling charges, to name a few. The Program Fee also does not include the fees and expenses Clients will be responsible for paying as a shareholder in each of the ETFs within a Client's Account. All ETFs will have ongoing expenses that will impact the return received by the relevant Account. These ongoing expenses include management fees, distribution expenses, shareholder servicing, administrative service, and similar fees. These fees and expenses are subject to change. A detailed explanation of fees and expenses is contained in each prospectus. Clients should carefully read each fund's prospectus. Please refer to the "Fee Schedule" available on the Site for more information regarding such additional fees, including respective rates. The Fee Schedule may be revised from time-to-time, as further discussed in the "Changes in Our Fees" section below. SLLC also provides the Fee Schedule to all Clients no less than annually.

### In-Kind Transfers

If a Client transfers assets into their Account "in kind," the Manager will have the discretion to sell, liquidate or dispose of some or all of those assets either immediately or at a future point in time. In such event, a Client will incur a brokerage commission or other charge, including a CDSC. The "in kind" transfer or liquidation of assets also may have tax consequences for the Client. Accordingly, Clients should consult with their Financial Advisor and tax consultant before transferring assets in-kind into an Account. If a Client transfers shares of a mutual fund into their Account and such mutual fund is sufficiently similar to a Program Fund, the Manager will have the discretion to retain such shares in the Client's Account. To the extent any such mutual fund charges 12b-1 fees, the holding may not be accepted as the Firm and by extension our Advisory Programs and Program Custodian do not permit funds that charge a 12b-1 fee on Platform. If accepted the position will need to be sold promptly.

### Custodian Fees and Charges

The customary ongoing custody fee charged by the Digital Advisory Program Custodian will be paid out of the Program Fee. However, the Program Fee will not cover certain fees and charges of the Program Custodian, including (but not limited to) fees associated with the following specific Account services: ACAT transfers; wire transfer charges; and other optional services which a Client elects to request.

### Deceased Clients

When SLLC receives notice that the Account holder of an individual account has died, SLLC will freeze the account(s), prorate the fee based on the period of time during the billing period the account was open and rebate any unused portion of the fee if applicable, and will await instructions from the executor or designated administrator of the deceased's estate. SLLC is not responsible

for taking any action with respect to such account(s) prior to its receipt of appropriate instructions, which means that SLLC will not take action in response to market fluctuations or other factors that may adversely impact the market value of any account.

#### Broker Dealer Accounts Transitioning to Advisory Programs

We act as a broker-dealer in addition to acting as an investment adviser. If a Client opens an Account with securities previously purchased through us or one of our Financial Advisors, that Client will already have paid a commission on the purchase to us or our Financial Advisor, or both. Similarly, if a Client opens an Account with cash proceeds from the sale of securities through us or our Financial Advisor, we or our Financial Advisor, or both, may have already received commissions on the sale. SLLC does monitor investments that may have been recommended and liquidated in a short period of time (in general, 2 years or less) where a new recommendation may be made. In some cases, SLLC will offer Clients a rebate of certain commissions and charge-back the original commission earned by the Financial Advisor when deemed appropriate.

For a description of the conflicts of interest associated with SLLC receiving both brokerage commissions and advisory fees, please see Item 9 in this Brochure.

#### Changes in Our Fees

SLLC and SigFig, upon 30 days prior notice to Clients, may revise the Program Fee or the Fee Schedule, including in a way that may cause the fees payable by a Client to increase. A Client will be deemed to have approved a fee change unless he or she objects to the fee change by sending written notice to us or SigFig, as applicable, within 30 days from the date of the fee increase notification. We further reserve the right to negotiate, discount or waive any fees associated with the Program in general or payable by any particular Client, or group of Clients, in our sole discretion. Furthermore, our employees and employees of our affiliates may be entitled to a discount of the Program Fee by virtue of their association with us.

#### Account Termination

A Client's Digital Advisory Program investment advisory agreement is not effective until it is accepted by SLLC. In addition, Clients, SLLC, and SigFig each have the option to terminate any Account by providing written notice to the other party. If an Account is terminated and all assets of the Account are withdrawn prior to the end of a month, no Program Fee will be payable by the Client with respect to such final partial billing period.

### **Item 5 – Account Requirements and Types of Clients**

SLLC's advisory services are available to individuals, corporations and other businesses, state or municipal government entities, pension and profit-sharing plans, and charitable organizations. Digital Advisory Program Clients are generally individual investors who are seeking to optimize their investment Portfolio, reduce their transaction costs, and/or hire an investment adviser. Clients are not required to have a certain amount of investment experience, personal wealth or

sophistication. SLLC generally imposes a \$2,000 minimum investment from Clients to participate, which can be reduced or waived at SLLC's sole discretion.

Prior to receiving investment advice from SLLC and SigFig, Digital Advisory Clients are required to open a Digital Advisory Program Account and provide the SLLC with:

- Identifying Information, e.g., email and password (The Firm will never have possession of or ask you for your credentials);
- Responses to a profile questionnaire in order to determine which investment recommendations that should be provided to the Client;
- An advisory agreement and electronic delivery consent; and
- An acknowledgment and agreement to SLLC's and, SigFig's Privacy Policy.

### **Item 6 – Portfolio Manager Selection and Evaluation**

The Digital Advisory Program provides the investment advice and Portfolio management services to our Clients using its proprietary web-based software and the Site. The Site is operated and hosted by SigFig on behalf of SLLC and investment recommendations are formulated using the Site Algorithms. The Digital Advisory Program is designed to provide a simple, low-cost investment solution to meet your objectives and needs. If SigFig fails to meet SLLC's expectations at any time, we may at our discretion evaluate and replace the Manager in the Digital Advisory Program with a more suitable Manager.

SLLC selected ETFs as the investment product for the Digital Advisory Program due to their reduced costs, fee transparency, and diversification. The decision to select the Manager as the Portfolio Manager offered through the Digital Advisory Program is made based on a review of Manager's investment management experience and track-record in accordance with the Firm's protocol for assessing Portfolio Managers. The criteria considered include the Manager's history, investment and diversification strategies, universe of available securities, investment process & research, attitude regarding cash positions, performance, including expected performance, and internal evaluation thereof, and fee structure. The Firm does not calculate performance or rely on any third-party to calculate or audit performance to determine whether it complies with any standard for performance calculation.

SigFig is responsible for implementing the Portfolios available through the Program, subject to any reasonable restrictions imposed by a Client. Neither the Firm nor any of its related persons currently act as a Portfolio Manager under the Digital Advisory Program, participate in the design of the strategic model Portfolios, or act as a manager for any of the ETFs available under the Digital Advisory Program. Neither the Firm nor any related persons is compensated for, has an interest in, or otherwise receives remuneration based on any Portfolio's target allocation. SLLC and its related persons do not manage, control, supervise, or otherwise exert any influence over the managers of the ETFs available through the Digital Advisory Program. However, while SLLC does not currently offer Portfolios constructed or managed by its affiliates, it may do so in the future, subject to applicable laws and regulations.

## Analysis

In the Digital Advisory Program, all analytical methodology, investment strategy determination, model Portfolio construction, security selection within each asset class, and the configuration of parameters for tax-loss harvesting strategies are determined and delivered through SigFig's Digital Advisory Platform and recommended to you by SLLC.

SigFig's investment methodology, which is reviewed and recommended to our Clients by SLLC, is based on a researched Portfolio management framework:

1. SigFig researches asset class options to understand their performance in different market and economic conditions by analyzing class returns, volatility, and correlation among the classes, and identifies which asset classes contribute to a well-balanced Portfolio;
2. Further, SigFig selects investment vehicles that it believes provide the balance of market coverage at lower cost;
3. SigFig creates Portfolios matched to a range of risk tolerances through Modern Portfolio Theory ("MPT") techniques. MPT attempts to maximize a Portfolio's expected return for a given amount of Portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities. By investing in various asset classes, i.e. diversifying, an investor can potentially reduce the overall riskiness of the Portfolio. Picking a specific mix of asset classes for a particular investor depends on such individual's risk tolerance and requires a technique known as mean-variance optimization, which is an analysis of the expected performance, variability, and correlation of each asset class based on observations over the last twenty years, weighted towards more recent history. This results in a series of Portfolios that are designed to have the least amount of risk for various levels of return. However, this analysis is based on the forward-looking projections that are inherently uncertain and there is no guarantee that any given Portfolio will meet its objectives.
4. In the RTQ, we ask Clients a set of questions to develop an understanding of their goals and preferences to balance the riskiness of investing with expected returns;
5. SigFig monitors daily and, if needed, rebalances Clients' Portfolios to maintain the model asset allocation as needed.

SigFig's proprietary software platform generates investment recommendations based on the Client's risk profile. The risk profile is built using the information about Client's age, time horizon, income, liquid assets, estimated percentage of household income saved, and risk tolerance provided by them in the risk profile questionnaire through the Site. As mentioned elsewhere in this Brochure, the risk profile questionnaire in the Digital Advisory Program is developed by SigFig and approved/modified and administered by SLLC.

SigFig's Algorithms also assess and try to optimize potential tax impact and tax harvesting opportunities "when selected" when transitioning the Client's existing Portfolio into the recommended Portfolio and perform ongoing tax efficiency management when executing trades in the Accounts. Clients should not construe the contents of the Site or any recommendation made by SigFig or SLLC as tax advice. Each Client must rely upon its own tax professionals.

SigFig's proprietary Algorithms are overseen by SigFig's Investment Committee, which determines SigFig's investment strategy, reviews the securities used in Client and Digital Advisory Investor Portfolios, and has the authority to institute necessary measures, such as halting trading, in adverse market conditions. The SigFig investment committee will provide SLLC with information to assist us with our oversight and on-going recommendations to our customers.

Clients with accounts in certain Digital Advisory Programs give SLLC, with SigFig as sub-adviser and Portfolio manager, discretionary authority to direct, manage, and change the investment and reinvestment of the Digital Advisory Investor's assets.

Clients are strongly encouraged to conduct their own analysis of, and investigation into, the methodologies employed by SigFig and recommended by SLLC. The fact that a recommendation or guidance is generated by SigFig's proprietary technology and recommended by SLLC cannot be interpreted as a guarantee of future performance. **Investing in securities involves risk of loss that Clients should be prepared to bear.**

Please note the Firm, our Financial Advisors or any related persons do not act in the capacity as a Portfolio manager. Additionally, we do not charge fees based on performance.

#### Risk Factors

Investing involves risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. The performance of any investment is subject to, and influenced by, multiple factors which include, but are not limited to, inflation risk, market risk, interest rate risk, issuer risk and general economic risk. The discussion of material risks provided below is not meant to be a complete description of risks that may be applicable to the Digital Advisory Program.

#### Reliance on third-party information

SLLC and SigFig conduct their analyses using detailed historical and forward-looking information. SigFig relies on third parties, which may include certain financial institutions, for the provision of market statistics, fund details, performance, and related information and although these parties are generally reliable and reputable, there may be inaccuracies or discrepancies in the information that is beyond SLLC's control.

SLLC's recommendations are based on the information and data filed by the issuers of securities with various government regulators or made directly available to SLLC by such issuers, or indirectly through other third-party sources. Although SLLC, through SigFig's proprietary software, evaluates such information and data, SLLC is not in a position to confirm the completeness, genuineness, or accuracy of such information and data, and in some cases, complete and accurate information is not readily available.

SLLC bases its recommendations and/or guidance on information provided by Clients to provide accurate information. If a Client provides inaccurate information, or does not verify that SLLC's Portfolio tracker has accurately captured their Portfolio holdings when syncing with their Account,



this will impact the quality and relevance of SSSLC's recommendations or guidance.

### Market Risk

There is no guarantee that the securities selected by SigFig or SSSLC in the context of the Digital Advisory Program will achieve their objective. The share prices of securities fluctuate, and investors can lose money by investing in securities. Securities may differ from each other in terms of investment style, objectives, management, geographical markets, holdings and numerous other factors. For a full description of the risks inherent in any specific security Clients should read the prospectus of the particular security recommended.

The Digital Advisory Program's investment strategies and/or investments are likely to be exposed to risks relating to weaknesses in various global economies and risks related to the economic cycle. Numerous factors affecting the performance of the Digital Advisory Program's investment strategies, such as market volatility, interest rates, equity prices, currency prices, credit spreads, and deflationary and inflationary pressures, may be affected by the economic cycle and long-term economic trends. Predictions about financial market conditions and economic factors are highly uncertain, and the presence, duration, and impact of any market or economic conditions could have a materially adverse effect on the investment strategies.

In recent years, disruptions in the global financial markets, the scope and severity of which are without precedent in recent financial history, have had materially adverse consequences for the values, liquidity, and stability of certain types of investments, including the types of investments that SSSLC's Clients may pursue. Similar or dissimilar disruptions may occur in the future, and the duration, severity and ultimate effect of such disruptions are difficult to forecast. In the event of a serious market disruption, SSSLC may delay or suspend order submissions in respect of Client Accounts. Such trading delays or suspensions may result in increased tracking error, lower returns and/or an inability to effect Portfolio strategies such as tax loss harvesting and rebalances.

### Cybersecurity Risks

With the increased use of technologies to conduct business, SSSLC and SigFig are susceptible to operational, information security, and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events that may arise from external or internal sources. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems (e.g., through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information; corrupting data, equipment, or systems; and causing operational disruption. Cyber-attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial-of-service attacks on websites (i.e., efforts to make network services unavailable to intended users). Cyber incidents have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, interference with the ability to calculate asset prices, impediments to trading, the inability to transact business, destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs. Similar

adverse consequences could result from cyber incidents affecting issuers of securities, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial institutions (including the Firm and service providers) and other parties. SLLC and SigFig are not responsible to any Client for losses unless caused by SLLC's or SigFig's breach of its fiduciary duty.

### Technology Risk

As mentioned above, SLLC provides its recommendations based on SigFig's proprietary software that utilizes various quantitative and qualitative models to generate recommendations based on information input into the system by Clients. Such computer-generated recommendations, like any or all investment recommendations, may be subject to system error. No guarantee or representation is made that the investment recommendations will be successful.

In addition, the operation of the software might be subject to human errors, processing or communication errors, or system failure. Changes made to the Algorithms may not always have the desired or intended effect. Further, as market dynamics (for example, due to changed market conditions and participants) shift over time, a previously highly successful model may become outdated or inaccurate, perhaps without the computer software system recognizing the change before further recommendations are made. As such, Clients are urged to verify any recommendations generated by SigFig's Algorithm with their own legal, financial, tax and advisors and to conduct their own due diligence on recommended investments before following any recommendation.

It is possible that Clients, SLLC, or SigFig, may experience computer equipment failure, loss of internet access, viruses or other events that may impair access to the Digital Advisory Program Site. **SLLC is not responsible to any Client for losses unless caused by SLLC's breach of its fiduciary duty.**

In making investment recommendations there are several factors that SLLC does not consider, including but not limited to:

### Transaction Costs and Frequency of Trading

With the exception of recommendations specifically focused on the frequency of the Client's trading (e.g., a recommendation to trade less frequently), SLLC does not consider the frequency of a Client's trading when the computer software generates a recommendation. If a Client's investment approach involves a high level of trading and turnover of their investments, such approach may generate substantial transaction costs, have tax implications (such as short-term capital gains) and other similar consequences that could negatively impact the value of the investment Portfolio. Clients should bear these transaction costs in mind when deciding whether to follow the recommendations generated by the Digital Advisory Program.

### Certain Characteristics of Existing Portfolios

SLLC does not consider the restrictions that may be inherent in a Client's existing investment accounts when making investment recommendations. For example, when making a recommendation to sell a security and replace it with a similar security, SLLC does not consider (but attempts to disclose) whether the existing security would be subjected to an early redemption fee if the Client sells such security. Further, SLLC does not consider the brokerage costs for effecting transactions in the Client's existing investment accounts when making securities recommendations. Clients should consider such potential costs, if applicable, and consult their Financial Advisors, as necessary, before acting on an investment recommendation made by SLLC.

### Tax Loss Harvesting

Clients should confer with their personal tax advisor regarding the tax consequences of investing with SLLC and engaging in the tax-loss harvesting strategy, based on their particular circumstances. Clients are responsible for how the transactions in their Accounts are reported to the Internal Revenue Service ("IRS") or any other taxing authority. SLLC assumes no responsibility to Clients for the tax consequences of any transaction, including any capital gains and/or wash sales that may result from the tax-loss harvesting strategy, or otherwise. The performance of the new securities purchased for tax-loss harvesting purposes may have different expenses, returns, volatility and other characteristics relative to the securities that are sold for tax-loss harvesting purposes. The effectiveness of the tax-loss harvesting strategy to reduce tax liability will depend on the Client's entire tax and investment profile, including purchases and dispositions in accounts (e.g., Client's or Client's spouse's) outside of SigFig and SLLC, and type of investments (e.g., taxable or nontaxable) or holding period (e.g., short-term or long-term). The utilization of losses harvested through the strategy will depend upon the recognition of capital gains in the same or a future tax period, and in addition may be subject to limitations under applicable tax laws, e.g., if there are insufficient realized gains in the tax period, the use of harvested losses may be limited to a \$3,000 deduction against income and distributions. Losses harvested through the strategy that are not utilized in the tax period when recognized (e.g., because of insufficient capital gains and/or significant loss carryforwards), generally may be carried forward to offset future capital gains, if any.

SLLC only monitors for accounts managed by SLLC. Clients are responsible for monitoring their and their spouse's accounts managed by other investment advisers to ensure that transactions in the same security or a substantially similar security does not create a "wash sale." A wash sale is the sale at a loss and purchase of the same security or substantially similar security within 30 days of each other. If a wash sale transaction occurs, the IRS may disallow or defer the loss for current tax reporting purposes. More specifically, the wash sale period for any sale at a loss consists of 61 calendar days: the day of the sale, the 30 days before the sale, and the 30 days after the sale. The wash sale rule postpones losses on a sale, if replacement shares are bought around the same time. SLLC may lack visibility to certain wash sales, should they occur as a result of external accounts, and therefore SLLC may not be able to affect whether a loss is successfully harvested and, if so, whether that loss is usable by the Client in the most efficient manner.

In order to avoid wash sales due to one or more transactions in the Client's Account, from time-to-time SLLC might replace a recommended investment ("primary" ETF) with a "similar" investment

(“secondary” ETF) as part of the tax-loss harvesting strategy which may not be commission free. The secondary ETF is expected, but is not guaranteed to, perform similarly and that might lower a Client’s tax bill while maintaining a similar expected risk and return on the Portfolio. Expected returns and risk characteristics are no guarantee of actual performance.

#### Limited Nature of the Digital Advisory Program Risk

The Digital Advisory Program is designed to provide a simple, low-cost investment solution. The Digital Advisory Program does not provide comprehensive financial or tax planning or legal advice, and Clients are advised and afforded the opportunity to seek the advice and counsel of their own tax, financial and legal advisers. Neither SLLC nor SigFig nor any of their affiliates is responsible for establishing or maintaining any Client Account’s compliance with any applicable requirements of the Internal Revenue Code or for determining any Client’s individual tax treatment regarding such account. Furthermore, neither SLLC nor SigFig nor any of their affiliates is responsible for withholding any tax penalties that may apply to Clients’ Accounts or for any state or federal income tax withholding, except as may otherwise be required by applicable law. SLLC’s recommendations are limited based on the information Clients provide through the Site and in the RTQ, a portion of which SLLC currently relies on in using SigFig’s Algorithm to recommend a Portfolio for Clients. Furthermore, the Digital Advisory Program: (i) relies on certain information provided by Clients through the RTQ in providing investment advice and does not verify the completeness or accuracy of any such information; (ii) is not a complete investment program; (iii) does not consider outside assets, concentration, debt or other accounts a Client may have with SLLC or SigFig, any of their affiliates or with any third party; (iv) offers a limited number of asset allocation models, profiles and underlying instruments; and (v) is not suitable for all investors. In addition, the universe of investment products offered through the Portfolios currently is limited to certain ETFs. There could be one or more products available in the investment community that are more appropriate than the investment products made available through the Digital Advisory Program. Given the inherent limitations of the Digital Advisory Program, Clients should carefully consider whether the Digital Advisory Program is the right investment solution for their needs.

#### Reliance on Data Risk

SLLC’s methods, and SigFig’s Algorithms, are highly reliant on data from third-party and other external sources. SLLC will use its discretion to determine what data to gather with respect to any strategy or method, which may have an impact on trading decisions. In addition, due to the automated nature of such data gathering and the fact that much of this data comes from third-party sources, not all desired and/or relevant data will be available to, or processed by, SLLC at all times. There is no guarantee that any specific data or type of data will be utilized in generating or making trading decisions on behalf of the Clients, nor is there any guarantee that the data actually utilized in making investment and trading decisions on behalf of Clients will be (i) the most accurate data available or (ii) free of errors.

#### Reliance on Algorithms Risk

The use of Algorithms to provide investment advisory services carries the risk that changes to the Algorithm's code may not have the desired effect with respect to Client Accounts. While this risk increases if changes to the Algorithms are insufficiently tested prior to implementation, even extensively tested changes may not produce the desired effect over time.

Furthermore, SigFig's Algorithms used in the Digital Advisory Program are based on a number of assumptions, as well as on Modern Portfolio Theory ("MPT"), which in turn is based on certain assumptions and has inherent limitations. MPT attempts to maximize a Portfolio's expected return for a given amount of Portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities. Investing in various asset classes (i.e., diversifying) may reduce the overall risk but this not a guarantee of any particular level of return. Picking a specific mix of asset classes for a particular investor depends on such individual's risk tolerance and requires a technique known as mean-variance optimization, which is an analysis of the expected performance, variability, and correlation of each asset class based on observations over the last twenty years. While widely used, MPT has certain limitations, including its assumptions that investors are not subject to taxes or transaction costs and do not have influence over the market, neither of which is correct in many cases. Also, while SigFig's Algorithms use inputs based on historical observations, past performance does not guarantee future results. Please refer to the SigFig Disclosure Brochure for further information regarding the SigFig Algorithms

#### Exchange-Traded Funds ("ETFs") Risks

An ETF generally is an investment company, unit investment trust or a Portfolio of securities deposited with a depository in exchange for depository receipts. The Portfolios of ETFs generally consist of common stocks that closely track the performance and dividend yield of specific securities indices, either broad market, sector or international. Fixed income ETFs generally consist of bonds issues by corporations or government. ETFs provide investors the opportunity to buy or sell throughout the day an entire Portfolio of stocks in a single security. Investment in an ETF involves payment of such company's pro rata share of administrative fees charged by such company, in addition to those paid by a Client. Supply and demand in the market for either the ETF and/or the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF.

An ETF could be impacted by a number of factors including but not limited to:

Investment style risk: The chance that returns from small and mid-capitalization growth stocks will trail returns from the overall stock market. Historically, small and mid-cap stocks have been more volatile in price than the large-cap stocks that dominate the overall market, and they often perform quite differently. Small and mid-size companies tend to have greater stock volatility because, among other things, these companies are more sensitive to changing economic conditions.

Market risk: The chance that stock prices overall will decline.

**SigFig risk:** The chance that an ETF may make a poor security selection or focus on securities in a particular sector, category, or group of companies will cause the ETF to underperform relevant benchmarks or other funds with a similar investment objective.

**Interest rate risk:** The chance that bond prices will decline because of rising interest rates. Interest rate risk should be moderate for the fund because it invests primarily in short- and intermediate- term bonds, whose prices are less sensitive to interest rate changes than are the prices of long-term bonds.

### Acts of God and Geopolitical Risks

The performance of your Account(s) could be impacted by Acts of God or other unforeseen and/or uncontrollable events (collectively, “disruptions”), including, but not limited to, natural disasters, public health emergencies (including any outbreak or threat of COVID-19, SARS, H1N1/09 flu, avian flu, other coronavirus, Ebola, or other existing or new pandemic or epidemic diseases), terrorism, social and political discord, geopolitical events, national and international political circumstances, and other unforeseen and/or uncontrollable events with widespread impact. These disruptions may affect the level and volatility of security prices and liquidity of any investments. There is risk that unexpected volatility or lack of liquidity will impair an investment’s profitability or result in it suffering losses. Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the likelihood that events or conditions in one country or region will adversely impact markets or securities industry participants in other countries or regions. The extent of the impact of any such disruption on us, you, and any underlying Portfolio investments, operational and financial performance will depend on many factors, including the duration and scope of such disruption, the extent of any related travel advisories and restrictions implemented, the impact of such disruption on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. A disruption may materially and adversely impact the value and performance of any investment, our ability to source, manage and divest investments, and our ability to achieve your investment objectives, ultimately resulting in significant losses to you. In addition, there is a risk that a disruption will significantly impact, or even temporarily or permanently halt, our operations and/or the operations of any underlying Portfolio funds and companies.

### Volatility Risk

The prices of certain products in the Account have been subject to periods of excessive volatility recently and in the past, and such periods can be expected to continue or recur. While volatility can create profit opportunities for the Account, it can also create the specific risk that historical or theoretical pricing relationships will be disrupted and may cause what should otherwise be comparatively low risk positions to incur losses. Price movements are influenced by many unpredictable factors, such as market sentiment, inflation rates, interest rate movements and general economic and political conditions. The expanded influence of social media platforms on the market, combined with the access to costless retail brokerage, can exacerbate the volatility of

particular issuers.

Other Risk Factors to Consider:

- Inflation Risk
- Currency Risk
- Reinvestment Risk
- Business Risk (related to particular industries or companies within an industry)
- Financial Risk (related to borrowing and bankruptcy)
- Liquidity Risk
- Fixed Income Risk
- Foreign and Emerging Markets Equity Risk
- High Yield Fixed Income Securities Risk
- Diversification Risk
- Tactical Strategy Risk

### Operating Events

Trade errors and other operational mistakes (“Operating Events”) occasionally occur in connection with the servicing and management of Clients and Digital Advice Investors’ Accounts. SigFig maintains policies and procedures that address identification and correction of Operating Events, consistent with applicable standards of care and Client documentation. An Operating Event generally is compensable by SigFig to a Client or Digital Advice Program Investor when it is a mistake (whether an action or inaction) in which SigFig has, in its reasonable view, deviated from the applicable investment guidelines or the applicable standard of care in managing a Portfolio, subject to the considerations set forth below.

Compensable Operating Events may include, but are not limited to: (i) the placement of orders (either purchases or sales) in excess of the amount of securities intended to trade for a Portfolio; (ii) the purchase (or sale) of a security when it should have been sold (or purchased); (iii) the purchase or sale of a security not intended for the Portfolio; (iv) the purchase or sale of a security contrary to applicable investment guidelines or restrictions; and (v) incorrect allocation of trades. SigFig makes its determinations regarding Operating Events pursuant to its policies on a case-by-case basis, in its discretion, based on factors it considers reasonable, including regulatory requirements, contractual obligations, and business practices. Not all Operating Events will be considered compensable mistakes. Relevant factors SigFig considers when evaluating whether an Operating Event is compensable include, among others, the nature of the service being provided at the time of the event, specific applicable contractual and legal requirements, and standards of care, whether an applicable investment objective or guideline was contravened, the nature of the Client’s investment program, and the nature of the relevant circumstances.

Operating Events may result in gains or losses or could have no financial impact. Where SigFig’s actions or inactions resulted in an Operating Event impacting a Digital Advice Program Investor’s account, the Operating Event is reported to the Firm and the account impacted is generally corrected

in accordance with procedures established by the Firm. With respect to an Operating Event which impacted a Client account, the Client is made whole from any losses resulting from the Operating Event.

### **Item 7 – Client Information Provided to Portfolio Managers**

SLLC, through the Site recommends a Portfolio based on the information about a Client's age, time horizon, income, liquid assets, estimated percentage of household income that such Client saves, and risk capacity provided by each Client in the RTQ through the Site. Other information collected by SLLC through the Site may include, among other things, information about a Client's identity, e-mail address, physical address, location, nationality, citizenship, tax residency, financial situation, investment objectives, or other information that is supplied to SLLC through the Site. Currently, Clients enter into an advisory relationship with SLLC, not with the Manager. SLLC shares the information Clients provide in their RTQs and subsequently through the Site with SigFig the Program Manager, to enable the Manager to (i) exercise discretion with respect to the day-to-day management of each Client's Account; (ii) provide instruction the Program Custodian for execution of transactions in each Client's Account; and (iii) perform such other services as SLLC, in its sole discretion, may delegate to the Manager. Such Client information that SLLC shares with the Manager is subject to the confidentiality provisions of the agreement between SLLC and the Manager.

### **Item 8 – Client Contact with Portfolio Managers**

The Digital Advisory Program will be provided primarily through the Site. Clients may contact SLLC at (866) 736-6475 for assistance. Personnel from our SID desk are available during normal business hours, generally 8am through 5:30pm EST, to address technical and Client service issues. In the event a Client has a question about the management of his or her Account, SLLC will contact the Manager to obtain the relevant information or attempt to facilitate a conversation between a representative of the Manager and the Client.

### **Item 9 – Additional Information**

#### Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the Client's evaluation of SLLC or the integrity of SLLC's management. Documented below is a disciplinary event that may be material to your evaluation of SLLC.

On January 6, 2020, Santander Securities entered into a settlement agreement as a single investment adviser representative provided advisory services in the state of New Hampshire prior to being registered to do so. SLLC should note that the adviser held a valid advisory license during the relevant time period; however, due to an administrative oversight, SLLC failed to register that license from May 2018 to July 2019. The settlement included a \$35,000.00 fine and \$15,000.00 for the cost of the investigation and unpaid fees.



On June 3, 2019, without admitting or denying any allegations or conclusions of law, SLLC entered into an assurance of discontinuance ("AOD") with the Commonwealth of Massachusetts. After an investigation conducted by the Attorney General's Office ("AGO"), the AGO alleged that a Massachusetts based SLLC registered representative ("RR") engaged in the sale of unsuitable variable annuity products to Massachusetts customers, including seniors. The AGO further alleged that from 2012 to 2014, SLLC failed to adequately supervise the RR's sale activities, enabling him to commit unfair and deceptive sales practices. In addition, the AGO alleged that SLLC failed to take adequate steps to reduce customer confusion between the broker-dealer and the bank.

SLLC offered to reimburse certain of the Massachusetts RR's customers' surrender charges and/or certain Massachusetts Clients of SLLC, who indicated they were confused. Provided certain Massachusetts Clients with a reminder that variable annuities are not FDIC insured, may lose value, are not bank guaranteed and were sold by the broker-dealer, not the bank. In addition, SLLC reminded SLLC's RRs of the definition of investment experience and general investment knowledge as defined and used in SLLC's new account form and provided a notice to RR's concerning appropriate methods for describing the differences between the broker-dealer and the bank during certain contacts with Massachusetts customers. SLLC paid a penalty of \$100,000, and offered the reimbursement of surrender charges, totaling approximately \$140,000 to certain Massachusetts Clients, if they chose to surrender their annuity.

On March 11, 2019, Santander Securities LLC (the "Firm"), without admitting or denying the findings, consented to the entry of an Order (File No. 3-19043) by the United States Securities and Exchange Commission (the "SEC") Instituting Administrative and Cease-and-Desist Proceedings, Making Findings, Imposing Remedial Sanctions and imposing a Cease-and-Desist Order (the "Order"). The Order stated that from January 1, 2014 to September 30, 2016, SLLC purchased, recommended, or held for advisory Clients mutual fund share classes that charged 12b-1 fees instead of lower-cost share classes of the same funds for which Clients were eligible, that SLLC and its associated persons received 12b-1 fees in connection with these investments, and that SLLC failed to adequately disclose on its Form ADV the conflicts of interest related to its receipt of 12b-1 fees and its selection of mutual fund share classes that pay such fees. The Order also stated that the above-described conduct constituted a violation of Sections 206(2) and 207 of the Advisers Act. The Order required SLLC to cease and desist from committing or causing any violations and any future violations of Sections 206(2) and 207 of the Advisers Act and to pay disgorgement and prejudgment interest to affected investors totaling \$270,539.89.

On December 14, 2018, without admitting or denying the findings, SLLC consented to sanctions alleged by "The State of New Hampshire" and to the entry of findings that in two transactions, executed in 2011 and 2013, SLLC sold municipal securities that may have violated MSRB Rule G-27. SLLC agreed to pay a \$2500 fine, \$7500 investigation costs, and a total of \$31,154.33 in restitution to the two affected Clients.

On June 6, 2017, SLLC settled with the "Office of the Commissioner of Financial Institutions" of the Commonwealth of Puerto Rico for alleged unsuitable transactions involving the sale of Puerto Rico closed end funds and Puerto Rico bonds to 16 customers located in Puerto Rico. Without

admitting or denying any responsibility or wrongdoing, SLLC paid restitution to the 16 affected customers and paid a fine of \$1,000,000.

On March 6, 2017, SLLC entered into an AWC ("Acceptance, Waiver and Consent") with the Financial Industry Regulatory Authority ("FINRA"). Without admitting or denying the findings, SLLC consented to the sanctions and to the entry of findings that in "twelve transactions", SLLC sold municipal securities for its own account to a customer at an aggregate price (including any mark-up) that was not fair and reasonable. SLLC was censured, fined \$175,000.00, and agreed to restitution of approximately \$62,807.48 plus interest for twelve transactions.

On September 26, 2016, a shareholder derivative and class action was brought by customers of certain Puerto Rico closed-end funds ("cefs") in Puerto Rico state court against Banco Santander, S.A., Santander Bancorp, Banco Santander Puerto Rico, Santander Securities LLC, Santander Asset Management LLC, and several directors and senior management of those entities in September 2016. Brought on behalf of the funds and of Puerto Rico based investors, the complaint alleges that the entities and individuals created, controlled, managed, and advised certain cefs to the detriment of the funds and their shareholders from March 1, 2012 through September of 2016. A notice of removal to federal court has been filed.

On October 13, 2015, SLLC was censured, fined \$2 million, agreed to restitution of approximately \$4.3 million in connection with certain solicited purchases of Puerto Rico municipal bonds and restitution and rescission offers of approximately \$121,000 in connection with certain employee transactions. SLLC also consented to revise certain supervisory systems and procedures relating to concentration, margin, and supervision of customer transactions and the use of certain tools by registered representatives.

#### Code of Ethics and Personal Trading

As required by applicable law, SLLC has adopted a Code of Ethics establishing policies and procedures for SLLC to handle actual and potential conflicts of interest that arise from providing advisory services. SLLC's Code of Ethics describes SLLC's fiduciary duties and responsibilities to Clients and sets forth SLLC's practice of supervising the personal securities transactions of employees with access to Client information. Individuals associated with SLLC may buy or sell securities for their personal accounts identical to, or different than, those recommended to Clients. It is the express policy of SLLC that no person associated with SLLC shall prefer his or her own interest to that of an advisory Client or make personal investment decisions based on investment decisions of advisory Clients. SLLC's Code of Ethics requires that SLLC and its directors, officers, and employees comply with federal securities laws.

To supervise compliance with its Code of Ethics, SLLC requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to SLLC's principals. SLLC also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPOs or private placements (limited offerings). Further, SLLC has implemented surveillance and exception reports that are designed to identify and correct situations in which an employee's personal trading

may conflict with that of a Firm's customer.

SLLC's Code of Ethics further includes SLLC's policy prohibiting the use of material non-public information and protecting the confidentiality of Client information. SLLC requires that all individuals must act in accordance with all applicable U.S. federal and state regulations governing registered investment advisory practices. Any individual not in observance of the above will be subject to discipline.

SLLC will provide a complete copy of its Code of Ethics to any Client or prospective Client upon written request to the Compliance Department at Santander Securities LLC, 2 Morrissey Blvd., Dorchester, MA 02125.

### Review of Accounts

SLLC monitors Client Accounts and generally maintains an ongoing oversight position in such Accounts. On-going reviews and monitoring is conducted by our Financial Advisors, the principal review team, our supervisory directors, and our surveillance team. SLLC reviews each Client Account at least annually. Additional account reviews may be triggered by any of the following events:

- A specific Client request;
- A change in Client goals and objectives;
- Large static cash positions;
- Accounts with little to no trading;
- An imbalance in a Portfolio asset allocation; and
- Material changes in market or economic conditions.

### Reports

With respect to the Digital Advisory Program, SigFig coordinates with SLLC to provide relevant summary emails to Digital Advisory Program Clients. Additionally, NFS will provide our Clients with quarterly written account statements showing their securities positions and account activity.

### Client Referrals and Other Compensation

Potential conflicts of interest may arise related to all forms of compensation and benefits received by SLLC and our Financial Advisors from third parties (such as mutual fund managers, third party asset managers, and through SLLC's executing broker) in connection with the sale of investment products and services to Clients. We have identified these conflicts and provide full transparency in our Conflicts of Interest Disclosure document.

Employees of our affiliates will have the opportunity to refer Clients to the Digital Advisory Program. Such referrals may result in the receipt by the relevant employee of a referral fee from its employer. We will comply with all applicable requirements of SEC Rule 206(4)-1 under the Investment Advisers Act of 1940, as amended ("Advisers Act") in connection with any referral arrangements

subject to Advisers Act Rule 206(4)-1, including appropriate disclosure of referral arrangements to our Clients and maintenance of referral agreements. Clients have the option of obtaining certain of the investment products we recommend for our Accounts through brokers or other agents that are not affiliated with us.

### Revenue Sharing Arrangements

SLLC can offer brokerage and investment advisory account services because we are registered as both a broker/dealer and an investment adviser. If you receive brokerage or advisory services from SLLC, you should be aware that Santander's interests may not always be the same as yours. Santander is paid both by you and, sometimes, by other entities that compensate Santander based on transactions for your account. The disclosures below describe certain potential conflicts of interest that may apply to your account. Please read these disclosures carefully and note that there may be additional conflicts of interest applicable to your specific accounts which are not addressed below. Please ask your Financial Advisor questions to make sure you understand your rights and Santander's obligations to you as a brokerage or advisory customer.

In a brokerage account, SLLC acts as securities broker/dealer of record with respect to your assets. When SLLC acts as a broker/dealer, the service is our trading capabilities. You direct all trading in your brokerage account.

In an advisory account, SLLC acts as a registered investment adviser. We provide investment advice and recommend Advisory Programs and then appointed Portfolio Managers make the investment decisions for you based on your investment objectives and risk tolerance.

There are some important differences between these accounts that you should understand. For either type of account, services are provided by your Financial Advisor who is associated with SLLC. Your Financial Advisor can assist you in making important financial decisions, in addition to providing access to financial markets, products and services. A Financial Advisor will help define your investment goals and objectives, and to qualify your risk tolerance so that you better understand risks associated with various investment options and the services best suited to your needs. Financial Advisors also assist with reporting on progress and providing insight on whether current savings and investments align with your future goals and objectives.

#### Registered Investment Advisor: Fee-Based Accounts

- Fee-Based Accounts may provide for ongoing Portfolio management subject to a fiduciary standard. SLLC and our Financial Advisors are responsible for managing your account to this standard by placing your interests ahead of our own, and meeting certain other duties set forth below.
- Fee-Based Accounts do not pay a commission on individual transactions, but instead pay an agreed upon ongoing advisory fee, which is typically a percentage based on the value of the assets in your account. The amount paid to our Firm and your Financial Advisor generally may vary based on the type of investments your Financial Advisor recommends

or selects on your behalf.

- Since your advisory fee is tied to your account value, Financial Advisors may be paid a higher fee as the value of your account goes up, or a lower fee if the value of your account goes down.
- The primary services you obtain with a Fee-Based Account are ongoing investment advice and monitoring of your investments, periodic rebalancing and professional money management.
- For these accounts, you authorize trades to be effected, your Portfolio rebalanced and other investment decisions to be made on your behalf without your pre-approval being required for each transaction.
- Clients with Fee-Based Accounts may have more frequent meetings with their Financial Advisors. Your Financial Advisor is required to offer to meet with you periodically to discuss your investment Portfolio and financial situation.
- Fee-Based Accounts require a minimum investment amount that varies for certain programs.
- Fee-Based Accounts may not hold certain products designed for Commission-Based Accounts.
- Fee-Based Accounts may receive additional investment related services including performance reporting.

Please note that SLLC Financial Advisors, regardless of your account type, may also receive cash and/or non-cash compensation such as deferred compensation and training symposiums. Portions of this compensation may be subsidized by external vendors and SLLC product providers, such as mutual fund companies, insurance carriers or money managers. Therefore, Financial Advisors may have a Financial incentive to recommend the programs and services of these sponsors, rather than other available products and services offered by SLLC.

#### Training and Education Compensation

Santander offers multiple ways for product providers or insurance companies to provide training and education to our Financial Advisors. The training may be offered in the local branch offices or in larger group settings, including at the national level. Certain product providers and insurance companies have agreed to dedicate resources and Funding to provide this training and education. This commitment could lead our Financial Advisors to Focus on products or annuities offered From these companies versus the products or annuities offered by product providers and insurance companies which are not represented in such training sessions.

Product providers and insurance companies may also provide compensation to offset or reimburse Santander for costs incurred in conducting training or educational meetings. These meetings are designed to educate Santander's Financial Advisors about the product characteristics, Features, suitability, customer services and sales techniques as they relate to the various products or annuities.

Additionally, from time to time, product providers or insurance companies may reimburse Santander For expenses incurred by branch offices in connection with training, educational, conferences or seminars For Santander's Financial Advisors and Clients. Financial Advisors may also receive promotional items, meals or entertainment or other non-cash compensation From product providers or insurance companies.

Training and education compensation may be paid to Santander by any of the insurance companies documented above, or other product provider.

#### Potential Conflicts of Interest Associated with Additional Compensation Arrangements

Periodically throughout the year, Santander initiates incentive programs for all its Financial Advisors. These programs include, but are not limited to, the following: programs that compensate associates for attracting new assets/Clients to Santander; programs that reward Financial Advisors for promoting investment advisory services; and programs that reward Financial Advisors who meet total production criteria.

Financial Advisors who participate in the programs noted above may be rewarded with cash and/or non-cash compensation, including bonuses, training conferences, and recognition trips. Portions of these programs may be subsidized by product providers and/or insurance companies. Therefore, Santander's Financial Advisors have a financial incentive to recommend the programs and services included in these firm sponsored programs rather than other available products and services offered by Santander.

Please refer to the Firm's disclosures attached to our new Account paperwork for the most current revision of this list, our Revenue Share Disclosure located on our site, or simply contact your Financial Advisor or the Firm for more information.

#### Financial Information

This Item is not applicable to SLLC as we do not take prepayment of more than \$1,200 in fees, six months or more in advance or have a financial condition that could impair our ability to meet our contractual obligations. Therefore, we are not required to provide our audited balance sheets.

#### Other Financial Industry Activities and Affiliations

In addition to the advisory services discussed in this Brochure, SLLC is also a full-service registered broker-dealer that engages in retail and institutional sales. Registered representatives sell and/or provide access to retail investments, including but not limited to variable annuities, fixed annuities, equities, ETFs, bonds and market linked CDs, operating as a division of SLLC under the name of "Santander Investment Services". Securities clearing is provided on a fully disclosed basis to Clients by NFS, an affiliate of Fidelity. SLLC effects transactions as a broker or agent for both advisory Clients and other Clients.

SLLC is a wholly-owned subsidiary of Santander Holdings USA, Inc., a holding company for Santander Bank, NA that provides various banking products and services primarily in the Mid-Atlantic and Northeastern United States. Santander Holdings USA, Inc. is a subsidiary of Banco Santander, S.A., a public reporting company traded on the New York Stock Exchange. While this is not an exhaustive list, other affiliates of SLLC include:

- ***Santander Bank, N.A., a national banking association whose primary business consists of attracting deposits from its network of retail branches, and originating small business and middle market commercial loans, and auto and other consumer loans in the communities served by those offices.***
- ***Banco Santander International provides private banking products and services to non U.S. Clients.***

Through the agreement SLLC has entered into with Santander Bank, N.A., Clients of this financial institution may be referred to SLLC by a Licensed Bank Employee ("LBE") registered as a representative of SLLC. Although not typical for a Digital Advisory Program, the LBE may receive compensation for referring such Clients to SLLC. Additionally, non-licensed bank employees could refer a Client to SLLC. For doing this, non-licensed bank employees could be eligible to receive a one-time minimal referral fee; this is not paid by SLLC. Any referral fee paid is part of their "Bank compensation"; SLLC does not pay any referral fees.

Certain representatives of SLLC, in their individual capacities, are agents of SLLC. As such, when Clients utilize these individuals in their capacity as registered representatives or as insurance agents, such individuals will be able to receive separate, yet customary, commission compensation resulting from implementing product transactions on behalf of such Clients. As such, it is a conflict of interests as SLLC and our Financial Advisors may be compensated more when they advise our Clients to participate in certain financial products or services. For more information about how SLLC is compensated and related conflicts of interests, please refer to our Compensation Disclosure form and our Conflicts of Interests Disclosure.

### Conflicts of Interest

Section 206(2) of the Investment Advisers Act of 1940 ("Advisers Act") prohibits an investment adviser, directly or indirectly, from engaging "in any transaction, practice, or course of business which operates as a fraud or deceit upon any Client or prospective Client," and imposes a fiduciary duty on investment advisers to act for their Clients' benefit, including an affirmative duty of utmost good faith and full disclosure of all material facts. Under Section 206(2), an investment adviser has a fiduciary duty to disclose to its Clients all conflicts of interest which might incline an investment adviser consciously or unconsciously to render advice that is not disinterested. A conflict of interest is a material fact that an investment adviser must disclose to its Clients. The Firm does its best to address most if not all conflicts throughout this Brochure and in our Conflicts of Interests Disclosure Form that compliments this Brochure.

Please review the SLLC “Conflicts of Interest Disclosure” and the “Compensation Disclosure” documents that can be found on our website for more transparency into the ways the Firm is compensated for the products and services we provide to our Clients.

<https://www.santanderbank.com/personal/investing-insurance/investment-services/disclosures>

The material reportable conflicts of interest encountered by a Client include, but are not limited to, those discussed throughout this Brochure. Other conflicts may be disclosed throughout this Brochure, which should be read in its entirety.

### Transactions with Affiliates

Section 206 under the Advisers Act regulates principal transactions among an investment adviser and its affiliates, on the one hand, and the Clients thereof, on the other hand. Very generally, if an investment adviser or an affiliate thereof proposes to purchase a security from, or sell a security to, a Client (a “principal transaction”), the adviser must make certain disclosures to the Client of the terms of the proposed transaction and obtain the Client’s consent to the transaction. In connection with SLLC’s advisory Clients, SLLC and its affiliates do not engage in principal transactions.

In connection with SLLC effecting transactions as broker or agent for both advisory Clients and other Clients, SLLC may, on occasion, act as a broker for an advisory Client on one side and a Client for whom it does not act as investment adviser on the other side of the securities transaction. Such “agency cross” transactions are permitted when the account has granted its prior permission in conformity with Rule 206(3)-2 of the Advisers Act, or when permission to affect the individual transaction has been granted prior to the completion of the transaction. SLLC faces potentially conflicting division of loyalties and responsibilities to the parties in agency cross transactions. SLLC has adopted policies and procedures in relation to agency cross transactions and the actual or potential conflicts of interest they create. SLLC addresses these conflicts by disclosing them to Clients, and not effecting any such transactions unless SLLC determines that the transaction is in the best interest of each Client and permitted by applicable law.

### Brokerage Practices

Execution and clearance of transactions for Digital Advisory Clients are provided by NFS. Clients participating in the Digital Advisory Program should understand that SLLC, in its separate capacity as a broker-dealer, is also the introducing broker on a fully disclosed basis on each Account. Although it does not currently receive brokerage compensation for acting as introducing broker-dealer with respect to the Digital Advisory Program, SLLC may in the future receive separate and typical brokerage compensation as a result with respect to such Accounts.

As discussed under Item 9, SLLC has a number of affiliated entities; however, none of these affiliates serve as an Investment adviser within the Digital Advisory Program or provide/offer our Clients any advisory services or investment advice.

SigFig, the Program Manager will also manage and trade the model Portfolios offered on the



platform. The Firm is not affiliated with SigFig, please refer to SigFig's Firm Brochure regarding their conflicts of interests, including but not limited to trading, directed brokerage, compensation, and conflicts due to affiliates.

### Best Execution

It is SLLC's policy to seek "best execution" for Digital Advisory Program Clients. "Best execution" means obtaining for a Client the most favorable execution (usually the lowest total cost (in purchasing a security) or highest total proceeds (in selling a security), subject to the circumstances of the transaction and the quality and reliability of the executing broker or dealer. Best execution is not measured solely by reference to commission rates or price. For example, paying a broker a higher commission rate than what another broker might charge is appropriate if the difference in cost is reasonably justified in seeking what is in the best long-term economic interests of SLLC's Clients.

SLLC believes that for the vast majority of securities transactions for its Clients, best execution is not quantifiable, but rather is a set of quality standards – a trading process that seeks to maximize the value of a Client's Portfolio over the course of time, given the stated investment objectives and circumstances. In short, SLLC seeks to achieve the best overall end result for each Client. Maximizing long term profit for SLLC's Clients takes precedence over short-term goals of cost efficiency in connection with individual trades.

### Research and Other Soft Dollar Benefits

SLLC does not receive research or other products or services other than execution from a broker-dealer or a third party in connection with Client securities transactions.

### Directed Brokerage

All transactions in the Account will be effected through NFS as clearing broker and Program Custodian, with SLLC acting as introducing broker. SLLC Clients in the Digital Advisory Program are not allowed the option of directing securities transactions to other broker-dealers or custodians.

### Aggregated Trades

It is the general practice of SLLC to aggregate trades, trades that cannot be aggregated and traded in a block are submitted in a randomized process seeking to ensure that each Client generally has equal priority over time. By not aggregating transaction orders and trading at different times during the day, Clients may potentially pay higher prices when buying securities, or receive lower prices when selling securities compared to the other Accounts depending on the size of the trades and the liquidity of the securities.

### Voting Client Securities

SLLC does not exercise voting authority over the securities held in our Client Accounts. If a

Client has an Account, the Client will be solely responsible for determining whether and how to vote proxies or act on similar actions in connection with the securities held in the Account. The Program Custodian will send proxies or similar action requests directly to the Client electronically. Neither SLLC nor SigFig shall have any responsibility to render legal advice or take any legal action on a Client's behalf with respect to securities then or previously held in such Client's Account(s), or the issuers thereof, that become the subject of legal proceedings, including bankruptcy proceedings or class actions. SLLC will instruct the Program Custodian to forward any information concerning legal proceedings or corporate actions involving securities in the Account to the relevant Client, and not to SLLC. The Program Custodian, and not SLLC, is responsible for timely transmission of any relevant material to each Client.

Securities and advisory services are offered through Santander Investment Services, a division of Santander Securities LLC. Santander Securities LLC is a registered broker-dealer, Member [FINRA](#) and [SIPC](#) and a Registered Investment Adviser. Insurance is offered through Santander Securities LLC or its affiliates.

INVESTMENT AND INSURANCE PRODUCTS ARE:		
NOT FDIC INSURED	NOT BANK GUARANTEED	MAY LOSE VALUE
NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY		NOT A BANK DEPOSIT

## Privacy Policy

FACTS	WHAT DOES SANTANDER SECURITIES DO WITH YOUR PERSONAL INFORMATION?	
<b>Why?</b>	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.	
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and account balances</li> <li>▪ payment history and transaction or loss history</li> <li>▪ credit history; credit scores and credit card or other debt</li> </ul>	
<b>How?</b>	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 Santander Securities chooses to share; and whether you can limit this sharing.	
	Reasons we can share your personal information	Does Santander Securities share?
	<b>For our everyday business process-</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes
	<b>For our marketing purposes-</b> to offer our products and services to you	Yes
	<b>For joint marketing with other financial companies</b>	Yes
	<b>For our affiliates' everyday business purposes-</b> information about your transactions and experiences	Yes
	<b>For our affiliates' everyday business purposes-</b> information about your creditworthiness	Yes
	<b>For our affiliates to market to you</b>	Yes
	<b>For nonaffiliates to market to you</b>	No
		Can you limit the sharing?
		No
		No
		No
		Yes
		Yes
		N/A
<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call (866) 736-6475</li> </ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 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. However, you can contact us at any time to limit our sharing.</p>	
<b>Questions?</b>	Call (866) 736-6475	

**Privacy Policy Continued**

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Santander Securities LLC
<b>What we do</b>	
<b>How does Santander Securities protect my personal information?</b>	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. Our information systems have controls, such as: firewalls, antivirus, passwords, periodic testing of our network access and encryption of computers and emails.
<b>How does Santander Securities collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ open an account</li> <li>▪ direct us to buy securities</li> <li>▪ make a wire transfer</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account-unless you tell us otherwise.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ Our affiliates include companies with the word "Santander" in their name.</li> <li>▪ Our affiliates include financial companies such as Banco Santander, S.A., Banco Santander Puerto Rico, Santander Insurance Agency, Inc., Santander Bank, N.A., Banco Santander International, Santander Holdings USA, Inc., Santander Asset Management, Santander Investment Services, and Santander Consumer USA</li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ Santander Securities does not share with nonaffiliates so they can market to you.</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ Our joint marketing partners include product and service providers, who assure us that they will protect the security and confidentiality of the information we provide to them.</li> </ul>