

Form ADV Part 2A

Vuefolio, Inc

718 De Soto Drive

Palo Alto, CA 94303

Contact: info@vuefolio.com

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This brochure provides information about the qualifications and business practices of Vuefolio, Inc. If you have any questions about the contents of the brochure, please contact us at the above email address. 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.

Additional information about Vuefolio, Inc also is available on the SEC's website at www.adviserinfo.sec.gov

Material Changes

The purpose of this page is to inform you of any material changes since the previous version of Vuefolio's Form ADV 2A brochure. If you are receiving this brochure for the first time this section may not be relevant to you.

Vuefolio reviews and updates the brochure at least annually and also if there are any material changes to make sure that it is still current.

The business and educational credentials of the principals have been updated. There are no other material changes from the November 5, 2014 version of the ADV.

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Advisory Business

Vuefolio is a privately owned business which offers personal investment advisory services primarily on college savings to our clients. The service is provided to our clients through the Internet as well as the mobile, tablet and other technologies that connect to the internet.

The principal owners of Vuefolio, who each own more than 25% of the company, are Oindrila Ray and Sameer Gupta.

Vuefolio offers investment advice on college savings which is tailored to our individual client's investment goals, risk preference, allocation choices, market exposure and their personal savings goals for their child's college. Our clients can access their personalized advice through a secured website: <https://www.vuefolio.com>.

Vuefolio may request additional investment related information from the client in order to provide the best investment advice to our clients. It is up to the client to provide the additional information. Incomplete and/or incorrect information provided by the client may lead to investment advice which is not personalized or accurate for that particular client.

Vuefolio will recommend mostly direct sold 529 plans and in some cases an advisor sold 529 plan if Vuefolio deems the advisor sold 529 plan to have better investment options and lower fees as opposed to the direct sold plan for any particular state. The client may designate Vuefolio to monitor and execute transactions in their 529 account by signing and notarizing a "Authorized Agent" form, "Power of Attorney", "Limited Power of Attorney" forms. These forms are available from the website of the 529 plan that they are considering as an investment. Vuefolio and the client will be using the forms which can be downloaded from the 529 plan website. Signing the "authorization" or the "power of attorney" form will allow Vuefolio to monitor and/or rebalance the client's current investments, as well as assign and distribute their future contributions amongst the various investment options available. As all direct sold 529 plans can be operated both by the account holder and by a designated "Authorized Agent", it is up to the discretion of the client to designate Vuefolio as the "Authorized Agent". As an investor in a direct sold 529 plan the client will also be able to conduct similar transactions in the event that they do not authorize Vuefolio to do so.

Withdrawal of funds: Vuefolio will not withdraw any funds from the client's 529 plans without their prior approval.

Vuefolio advice may also contain recommendations to buy, sell or exchange certain asset classes in your investment accounts where you may be saving for your child's college education. Vuefolio does not have the discretionary management authority to trade on behalf of our client nor make investment decisions for our client, relating to any particular securities. The company does not provide continuous and regular supervisory management services, as distinguished from advice based on the client's individual market position.

Fees and Compensation

Vuefolio offers two levels of service: Vuefolio Free and Vuefolio Premium. The users or clients of Vuefolio Free are not required to pay for the portion of the Vuefolio which has been designated free. The users or clients of Vuefolio Free do not have access to the premium section of Vuefolio unless they become premium members.

The annual fee for using the premium services of Vuefolio is \$150.00. The premium users are only charged after they have gone through the Vuefolio Free portion and have then decided to join the premium section of Vuefolio.

The annual fees are payable at the beginning of the contract. The annual contract can be entered into any time and will be valid for one year from the date of subscription. The fees are subject to change with Vuefolio notifying its clients of any change at least 30 days in advance. Some of the Vuefolio services such as our projection of college costs, your child's eligibility for college financial aid, our projection of your net costs is available at no additional cost to you upon subscribing to Vuefolio.

The fees will not be deducted from the client's assets or from any accounts that maybe tracked through the Vuefolio system/website. The fees will be paid separately by the client through a recurring billing process. Vuefolio uses Stripe as its billing vendor.

Account Termination:

Clients may terminate their subscription with Vuefolio at any time, to be effective at the end of the month in which notice of termination is given.

Performance-Based Fees and Side-By-Side Management

Vuefolio does not charge any performance based fees.

Types of Clients

Vuefolio provides investment advisory services to individuals and families for the purposes of their children's college education.

Methods of Analysis, Investment Strategies, and Risk of Loss

Vuefolio recommends that its clients maintain a balanced and diversified portfolio of securities. These include U.S. and foreign equities, U.S. corporate and government bonds, foreign corporate and government bonds, as well as mutual funds and ETFs which invest in these and other asset classes.

Vuefolio has a proprietary projection model for college costs and financial aid based on over 40 years of historical college cost and financial aid data available from the U.S. Department of Education. Based on client responses and our proprietary model, Vuefolio will recommend a savings plan for the client. Vuefolio will recommend that its clients invest for college in state sponsored 529 plans whenever appropriate. Vuefolio is not affiliated with any state 529 plans and offers unbiased recommendations of 529 plans and age based investment options based on many metrics such as fees, expense ratios, diversification, asset allocations of the underlying funds as well as the client's college savings goals. Vuefolio may allow its clients to customize their college savings plan with non age based investment choices offered to the 529 plan account holder who is invested in a particular 529 plan.

As many clients also save for college in investments outside of 529 plans, Vuefolio tracks the non 529 savings to offer a complete view of the client's college savings. Vuefolio may offer advice on the non 529 plan savings which have been specifically earmarked by clients for the purpose of college savings. The allocation of assets between different security classes will be recommended by Vuefolio to the client based on our characterization of the client's investment goals for college savings and risk tolerance. Vuefolio shall also endeavor to recommend long-term investment holdings to its clients, though this will be subject to the client's investment goals and horizons. Vuefolio may allow its clients to customize and add to the metrics that have been determined by Vuefolio to have an impact on the client's portfolio.

Vuefolio does not guarantee the results of the investment advice or strategies to its clients. Vuefolio is not responsible for the performance or the portfolio offerings of the state sponsored 529 plans. Financial markets change daily and often unpredictably and sometimes have large movements within a short time frame. Investing in any securities inherently involves risks of loss that clients should be prepared to bear.

On an as needed basis (as determined by Vuefolio), Vuefolio shall review the client's college savings portfolio and determine whether it is still aligned with the allocation as discussed above. If required, Vuefolio will recommend the necessary transactions required to rebalance the portfolio. This analysis will use a proprietary model of risk determination which uses both current and historical fundamental and pricing data for the securities in the portfolio. Vuefolio will obtain this data from reliable sources in order to ensure that the data used in our models is of high quality and generally error-free. Also, the quality of the advice which Vuefolio provides its clients is dependent on the completeness of the information provided by the client to us.

Disciplinary Information

Vuefolio and its employees do not have any prior or pending criminal or civil disciplinary actions in a domestic or foreign court of jurisdiction.

There have been no administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority involving Vuefolio, or its officers and employees.

There have been no proceedings before a self regulatory organization involving Vuefolio.

Other Financial Industry Activities and Affiliations

Vuefolio has no other financial industry activities or affiliations that would create a material conflict of interest with its clients. Vuefolio does not receive any commissions from any 529 plans or from any financial institutions/managers etc.

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

Vuefolio has adopted a Code of Ethics (“Code”) consistent with Rule 204A-1 under the Investment Advisers Act of 1940. The Code, a copy of which is available upon request by any client or prospective client, establishes rules of business conduct for all employees of Vuefolio. The Code provides guidance related to avoidance of actual or apparent conflicts of interest, insider trading, or other forms of unethical business conduct. The Code also governs personal securities trading activities in the accounts of Vuefolio’s employees, immediate family/household accounts and/or accounts where the employee has a material beneficial interest.

The employees of Vuefolio may buy and/or sell and/or invest in securities owned by its clients. However, Vuefolio does not buy/sell or invest in securities for its own account and there is no potential conflict of interest between Vuefolio and its clients.

Vuefolio employees may invest in the 529 plans recommended for its clients. Vuefolio does not invest in any 529 plans for its own account and there is no conflict of interest between Vuefolio and its clients regarding 529 plans.

Vuefolio does not receive any commissions from any 529 plans or from any financial institutions/managers etc and there is no conflict of interest for the client.

Brokerage Practices

Vuefolio does not select or recommend broker-dealers for its clients, and does not execute or direct transactions on behalf of its clients.

Review of Accounts

Vuefolio does not review investment accounts of its clients on a periodic schedule. When the client chooses to review their accounts, the accounts are reviewed by automated computer algorithms.

Vuefolio will have the permission of the client to review their 529 accounts on a periodic basis if the client has signed the “Limited Power of Attorney” or “Power of Attorney” and “Authorized Agent” forms which are available on the websites of the state 529 plans. The periodic review will be conducted by automated computer algorithms.

Client Referrals and Other Compensation

Currently Vuefolio does not have any client referral relationships. Vuefolio may in the future enter into agreements with third parties for client referrals, and may compensate the third party for referrals. Also, Vuefolio may offer promotions and discounts to existing clients for referring new clients to Vuefolio.

Custody

Vuefolio does not have custody of any client assets.

Investment Discretion

Vuefolio does not accept discretionary authority to manage any securities on behalf of its clients in their brokerage accounts. Clients may designate Vuefolio as an authorized agent/adviser to

manage their 529 accounts by the client signing and notarizing the “Authorized Agent”, “Power of Attorney” or “Limited power of Attorney” forms available on the 529 plan website.

Voting Client Securities

Vuefolio does not accept authority to vote client securities on behalf of its clients.

Financial Information

- A. Vuefolio does not require prepayment of fees other than the \$150.00 annual fee.
- B. There are no financial conditions that are reasonably likely to impair Vuefolio’s ability to meet its contractual commitments to its clients.
- C. Vuefolio has not been subject to a bankruptcy petition.

Education and Business Experience of Principals

The education and business experience of the two principals of Vuefolio, Inc are as follows:

Oindrila Ray

Formal Education after high school:

- 1992: University of Mumbai; B.S, Physics
- 1994: Indian Institute of Technology, Mumbai; M.S, Physics
- 2000: Pennsylvania State University; Ph.D., Physics

Business Background:

- 2011 – Present: Vuefolio, Co-founder and Chief Executive Officer
- 2016 – Present: O's List, Co-founder
- 2008 – 2010: SiCure Mobile, Vice President, Operations and Co-founder
- 2005 – 2007: various Hardware Startups, Technology and Integration Consultant
- 2000 – 2003: Cypress Semiconductor, Senior Engineer

Sameer Gupta

Formal Education after high school:

- 1994: Indian Institute of Technology, Mumbai; Bachelor of Technology, Engineering Physics
- 2000 Pennsylvania State University; Ph.D., Physics

Business Background:

- 2011 – Present: Vuefolio, Co-founder, Chief Investment Officer and Chief Compliance Officer
- 08/2018 – Present: Drishti, VP of Data
- 2016 – Present: O's List, Co-founder
- 2003 – Present: Lindamar Capital, Managing Director and Co-founder
- 2001–2003: Robertson Stephens, Quantitative Financial Analyst in Equity Derivatives