

**Item 1 – Cover Page**

**Investment Link, LLC**  
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Date of Disclosure Brochure: May 2018

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This disclosure brochure provides information about the qualifications and business practices of Investment Link, LLC (also referred to as we, our or us and Investment Link throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact us at (248) 621-4545 or [support@invlnk.com](mailto:support@invlnk.com). The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Investment Link is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for Investment Link, LLC or our firm's CRD number 295467.

\*Registration as an investment adviser does not imply a certain level of skill or training.

\*\*Although Investment Link is referred to as we, our or us throughout this brochure for your convenience, please understand that any engagement described under this brochure will be made with the legal entity of Investment Link, LLC.

## **Item 2 – Material Changes**

Investment Link is a newly registered investment adviser, and this disclosure brochure dated May 2018 is the first disclosure brochure prepared by our firm. In the future, this item will discuss only specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes. We will also reference the date of the last annual update of this disclosure brochure.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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## Item 4 – Advisory Business

Investment Link is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company (LLC) formed under the laws of the State of Michigan.

- Investment Link is a privately held company headquartered in Southfield, MI. Additional information about Investment Link's structure, directors, and owners is provided on Part 1 of Investment Link's Form ADV which is available online at <http://www.adviserinfo.sec.gov> or at <http://www.myinvestmentlink.com>. We encourage visiting our website [www.myinvestmentlink.com](http://www.myinvestmentlink.com) for additional information.
- Investment Link filed its initial application to become registered as an investment adviser in May 2018.

### **Introduction**

The investment advisory services of Investment Link are provided to you exclusively through an interactive website using appropriately licensed and qualified individuals who are investment adviser representatives of Investment Link (referred to as your investment adviser representative throughout this brochure).

### **Tailor Advisory Services to Individual Needs of Clients**

Investment Link tailors its automated web-based financial planning and advisory services to the individual needs of each client, and subject to certain product features and account limitations that prospective clients should consider, as described further below and in Item 7. When providing our services, we determine your investment objectives and suitability information through an automated web-based interviews and questionnaires.

### **Description of Advisory Services**

As a financial technology firm, Investment Link will offer the investment advisory services exclusively through the Software as a Service (SaaS) subscription to its web-based retirement income management system, branded under The *Retirement Buckets*™ Income Plan. The software will offer the investment advice, including future projections, asset allocation, monthly/quarterly rebalancing recommendations, specific investments. Please understand that a written agreement, which details the exact terms of the service, must be agreed by you and Investment Link before we can provide you the services described below.

**Financial Planning Services** - Investment Link offers web-based financial planning services, which involve the use of an interactive website to create investment advice to individual subscribers. These services are described below:

- **Registered** subscriber services provided:
  1. Funding Summary for The Retirement Buckets™ Income Plan

- ***Helps subscribers try and determine if they have enough savings to retire and stay retired.***
- 2. Social Security Benefit Estimator
  - ***Helps Subscribers try and determine the best time to begin collecting Social Security.***
- **Standard** subscriber services provided:
  1. Funding Summary for The Retirement Buckets™ Income Plan
    - ***Helps subscribers try and determine if they have enough savings to retire and stay retired.***
  2. Social Security Benefit Estimator
    - ***Helps Subscribers try and determine the best time to begin collecting Social Security.***
  3. The Retirement Buckets™ Income Plan
    - ***Helps Subscribers try and determine how their current assets would generate Retirement Income,***
  4. Dashboard Tracking
    - ***Helps Subscribers try and determine the projected value of each Bucket.***
  5. Bucket Allocation of Funds
    - ***Helps Subscribers try and determine the best possible time to transfer current assets to decrease the investment risk.***
- **Premium** subscriber services provided:
  1. Funding Summary for The Retirement Buckets™ Income Plan
    - ***Helps subscribers try and determine if they have enough savings to retire and stay retired.***
  2. Social Security Benefit Estimator
    - ***Helps Subscribers try and determine the best time to begin collecting Social Security.***
  3. The Retirement Buckets™ Income Plan
    - ***Helps Subscribers try and determine how their current assets would generate Retirement Income,***
  4. Dashboard Tracking
    - ***Helps Subscribers try and determine the projected value of each Bucket.***
  5. Bucket Allocation of Funds
    - ***Helps Subscribers try and determine the best possible time to transfer current assets to decrease the investment risk.***
  6. Asset Allocation
    - ***Helps Subscribers try and determine how to allocate their current assets.***
  7. Investment Recommendations
    - ***Helps Subscribers try and determine what funds to invest their current assets.***
  8. Rebalancing & Updates
    - ***Helps Subscribers try and determine how and when their assets may be rebalanced over time to help reduce investment risk.***

Investment Link's services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement any recommendations.

### **Limits Advice to Certain Types of Investments**

To simplify the investing process and make it easier for our clients to implement the investment strategies, Investment Link typically provides investment advice on:

- FDIC insured Bank CDs
- Money Markets,
- ETFs and
- Mutual Funds.

Although Investment Link generally provides advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

When providing investment advice Investment Link typically constructs each client's account holdings using FDIC insured Bank CDs, Money Markets, Exchange Traded Funds (ETFs), and Mutual Funds to build diversified portfolios. *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

### **Client Assets Managed by Investment Link**

Investment Link does not provide asset management services.

## **Item 5 – Fees and Compensation**

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding Investment Link's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Investment Link.

### **The Retirement Buckets™ Income Plan**

The following are the fee arrangements available for The Retirement Buckets™ Income Plan, an automated web-based financial planning service offered by Investment Link.

- Registered: Free of charge.
- Standard: \$23.99/mo. or \$239.90/year.
- Premium: \$29.99/mo. or \$299.90/year.

Please refer to ***Item 14 - Client Referrals and Other Compensation*** for a description of a program to potentially reduce the annual fee for the Retirement Buckets™ Income Plan.

### ***Fees for Financial Planning Services***

Investment Link provides an automated web-based financial planning services under a fixed fee arrangement. A mutually agreed upon fixed fee is charged for financial planning services under this arrangement. The amount of the fixed fee for your engagement is specified in your agreement with Investment Link. You are required to pay your first monthly payment in advance at the time you execute an agreement with Investment Link. Each additional monthly payment will also be payable in advance on the established due date. At no time will Investment Link require payment of more than \$1,200 in fees more than six months in advance.

The financial planning services terminate upon either party providing written notice of termination to the other party.

If you terminate the financial planning services after entering into an agreement with Investment Link, you will be responsible for immediate payment of any financial planning services performed by Investment Link prior to the receipt by Investment Link of your notice of termination. For financial planning services performed by Investment Link under a fixed fee arrangement, if you terminate the relationship after making an on-line purchase your access to our web-based planning tools will remain active until the expiration of the time period purchased.

### ***Other Fee Terms for Financial Planning Services***

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly by credit or debit card.

If you elect to pay by credit or debit card, you will provide written authorization to Investment Link for such a charge.

You should notify Investment Link within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

All fees paid to Investment Link for services provided are separate and distinct from the commissions charged by a broker-dealer or fees charged by an investment adviser to implement such recommendations.

It should be noted that lower fees for comparable services may be available from other sources.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

## **Item 7 – Types of Clients**

The potential clients evaluating Investment Link's automated web-based financial planning service should be aware that Investment Link's relationship with Clients is likely to be different from the "traditional"

investment advisor relationship. Since Investment Link is an automated web-based financial planning service, each potential client must acknowledge their ability and willingness to conduct their relationship with Investment Link on an electronic basis. Each Client must agree to receive all information, documents, and any updates or changes through their access to Investment Link's website and electronic communications. Unless noted otherwise, all documentation related to the advisory services are managed electronically.

Investment Link generally provides investment advice to the following types of clients:

- Individuals
- Other investment advisors

You are required to execute an agreement with Investment Link specifying the particular advisory services in order to establish a client arrangement with Investment Link.

### **Minimum Investment Amounts Required**

There are no minimum investment amounts or conditions required for establishing a relationship with Investment Link. However, all clients are required to execute an agreement for services in order to establish a client arrangement with Investment Link.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

Investment Link uses the following methods of analysis in formulating investment advice:

**Fundamental** – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.



Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, Investment Link gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

### **Investment Strategies**

Investment Link uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases - Investments held at least a year.

Short term purchases - Investments sold within a year.

Tactical asset allocation - Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation - Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's

goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Target Volatility Portfolios - The target volatility asset allocation strategy systematically rebalancing portfolios between equity and fixed income assets based on the realized volatility of each asset class to maintain the desired volatility levels.

### **Types of Investments Recommended**

Investment Link primarily recommends FDIC insured Bank CDs, Money Markets, Exchange Traded Funds (ETFs), and Mutual Funds to build diversified portfolios.

### **Risk of Loss**

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, Investment Link is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment recommendations, research, analysis and determination of portfolio securities. If Investment Link recommendations do not produce the expected returns, the value of the investment will decrease.
- Software Risk - Investment Link delivers its automated web-based financial planning services entirely through software. Consequently, Investment Link designs, develops and tests its software before putting such software into production and periodically monitors the behavior of such software after its deployment. Notwithstanding, it is possible that such software may not always perform exactly as intended or as previously disclosed on the website, blogs, or other Investment Link media and disclosure documents, especially in certain combinations of unusual circumstances. Investment Link continuously strives to monitor, detect and correct any software that does not perform as expected or as disclosed.

#### **Item 9 – Disciplinary Information**

*Item 9* is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

Investment Link is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

Investment Link is an independent registered investment adviser and only provides investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

### **Code of Ethics Summary**

According to the *Investment Advisers Act of 1940*, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Investment Link has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the *Investment Advisers Act of 1940* that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The Code of Ethics covers all individuals that are classified as “supervised persons”. All employees, officers, directors and investment adviser representatives are classified as supervised persons. Investment Link requires its supervised persons to consistently act in your best interest in all advisory activities. Investment Link imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Investment Link. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

### **Affiliate and Employee Personal Securities Transactions Disclosure**

Investment Link or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Investment Link that all persons associated in any manner with our firm must place clients’ interests ahead of their own when implementing personal investments. Investment Link and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

Investment Link is now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider”.
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Investment Link.

Any associated person not observing our policies is subject to sanctions up to and including termination.

## **Item 12 – Brokerage Practices**

Clients are under no obligation to act on the recommendations of Investment Link. The firm will not assist in the implementation of any recommendations. Clients will be responsible for choosing the broker dealer/custodian that will hold their accounts.

### **Brokerage Recommendations**

Investment Link will not assist you in the implementation of any recommendations.

### **Directed Brokerage**

Clients are required to select the broker-dealer that will be used for their accounts. Clients directing the use of a broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Investment Link does not have a soft dollar agreement with a broker-dealer or a third-party.

### **Block Trading Policy**

The firm does not place transactions on behalf of clients.

## **Item 13 – Review of Accounts**

### **Account Reviews and Reviewers**

Our financial planning services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services. Investment Link provides all Clients with continuous access to its automated web-based financial planning service, based on their subscription, where Clients can access their accounts to review the details of the advice.

### **Statements and Reports**

Clients do not receive any reports other than reports available through Investment Link software based on their subscription.

You are encouraged to always compare any correspondence provided by us against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

## Item 14 – Client Referrals and Other Compensation

### **Investment Link Refer-a-Friend, Reward Yourself Program Terms and Conditions**

Through Investment Link Refer-a-Friend, Reward Yourself Program you can invite friends to subscribe with Investment Link products and services by sending them an invitation via the Investment Link interface. Investment Link will send one invite on your behalf and may send up to two reminders to each person you invite. The reminders may be different from the original invite.

Reward for you (referrer) is in the form of a lifetime discount of 10% to the lowest subscription price found under the Next Billing Amount of your Subscription Information. To be eligible for the reward, the person you refer (referee) must subscribe to any paid plan and use your personal discount code when they sign up. The discount to your subscription is applied once the person you referred activated their new account. The discounted subscription price is charged on the date found under the Next Billing Date of your Subscription Information. Subject to the limitations above, you can receive one reward discount per each referral with an unlimited number of referrals.

Example: Premium Plan with an annual subscription of \$299.90/year.

Reward	Next Billing Amount	Discount	New Billing Amount
1	\$299.90	10%	\$269.91
2	\$269.91	10%	\$242.92
3	\$242.92	10%	\$218.63
4	\$218.63	10%	\$196.77
5	\$196.77	10%	\$177.10
6	\$177.10	10%	\$159.39

Reward for the person you refer (referee) is in the form of a lifetime discount of 10% to their subscription price. To be eligible for the reward, the person must subscribe to any paid plan and use the referrer's discount code received via email or any other Investment Link interface during the subscription checkout.

This promotion is not valid with any other offers and is non-transferrable. Offer available to U.S. residents only. Investment Link reserves the right to terminate this offer at any time for any reason, to limit the amount of rewards you are eligible to receive, and to refuse or recover any promotion reward if Investment Link determines that it was obtained under wrongful or fraudulent circumstances, that inaccurate or incomplete information was provided in opening the account, that any rules or regulations would be violated, or that any Investment Link terms have been violated.

Your participation in Investment Link Refer-a-Friend, Reward Yourself Program is voluntary, and you are under no obligation to participate. If you choose to participate, your participation is in no way shall be deemed to create an agency or employee-employer relationship of any kind between you and Investment Link. In referring any persons to Investment Link, you are acting on behalf of Investment Link, receiving monetary reward(s) as described above, and under the supervision and control of Investment Link. You agree to limit the information you provide in connection with the referral to the referral web page and/or email provided by Investment Link and further agree that you will not provide individuals with recommendations regarding their specific needs or investment decisions. You agree that your participation will conform to the terms contained herein as well as the provisions of the Investment Advisers Act of 1940, 15 U.S.C. 80b-1, the Employment Retirement Income Security Act of 1974, 29

U.S.C. ch. 18, and the rules thereunder. You hereby represent that: (1) you are not subject to any statutory disqualification set forth in Sections 203(e) and 203(f) of the Investment Advisors Act (or any amended or replacement regulatory provision(s)); (2) you are not currently the subject of any investigation or proceeding which could result in statutory disqualification; and (3) you do not have a "place of business" at which you regularly provide investment advisory services, solicit, meet with, or otherwise communicate with clients, or any other location that is held out to the general public as a location at which you provide investment advisory services, solicit, meet with, or otherwise communicate with clients in any U.S. state. If you cannot accurately make the preceding representations, you may not participate in this program. If you are currently participating and the preceding representations become inaccurate, you agree to immediately inform Investment Link at [support@invlnk.com](mailto:support@invlnk.com).

### **Financial Professional Client Discount Program**

Investment Link will offer other registered investment advisory firms with the opportunity to provide their clients access to The *Retirement Buckets*™ Income Plan at 50% of our normal rate.

### **Employer/Organization Client Discount Program**

Investment Link will also offer any employer of membership organization the ability to offer their employees/members the ability to access The *Retirement Buckets*™ Income Plan with a 25% discount off our normal rate.

### **Other Compensation**

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Investment Link receives no other forms of compensation in connection with providing investment advice.

*Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.*

## **Item 15 – Custody**

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented. According to this definition, Investment Link does **not** have custody of client funds or securities.

## **Item 16 – Investment Discretion**

When providing services, Investment Link does not maintain any trading authorization over your Account.

### **Item 17 – Voting Client Securities**

Investment Link does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

### **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. Investment Link does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. Investment Link is not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Investment Link has not been the subject of a bankruptcy petition at any time.

### **Business Continuity Plan**

Investment Link has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Investment Link's continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.



## Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Investment Link does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

**Commitment to Your Private Information.** Investment Link is committed to safeguarding the confidential information of its clients. Investment Link holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, the firm does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, the firm will provide clients with written notice and clients will be provided an opportunity to direct Investment Link as to whether such disclosure is permissible.

**Why We Collect and How We Use Information.** To conduct regular business, Investment Link may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Investment Link to provide access to customer information within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, the firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the firm's behalf.

- Information Investment Link receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Investment Link

**Sharing Information with Other Companies Permitted Under Law.** Since Investment Link shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that the firm has a change to its customer privacy policy that would allow it to disclose nonpublic information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

**Former Customers.** Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.