



As disclosed in our Form ADV Parts 1A and 2A, we offer financial planning, portfolio management services and an investment strategy newsletter to individuals, high net worth individuals, businesses, and retirement plan sponsors via our web-based platform. As disclosed in our Form ADV Part 2A firm brochure (Item 8), our firm recommends a range of active and passive portfolio management strategies. Our firm does not sponsor or serve as portfolio manager for wrap investment programs.

How we monitor your accounts

As part of our portfolio management services, described in Item 13 of our Form ADV Part 2A firm brochure, our advice is rendered strictly through an online delivery solution designed to be operated by the user (client) themselves. Clients have unlimited access and frequency to employ our systems' functionality and can review their account, portfolio allocation, etc., and update it as necessary. Since we are an Internet-only firm, by regulation, our client services staff are available to assist clients via telephone, email, or online chat about platform technical issues they may experience, but they do not provide trading advice or enter trading orders. We do not currently monitor client accounts.

Investment Authority

As disclosed in Item 16 of our Form ADV Part 2A firm brochure, due to our need to auto-rebalance or amend positions in accounts, we prefer to manage client portfolios on a discretionary basis, and we require our performance fee accounts to be served by a discretionary agreement. Via limited power of attorney signed by the client, discretionary trading authority allows our firm to implement investment decisions in order to meet stated portfolio objectives, without requiring the client's prior authorization for each transaction. The client must grant our firm discretionary trading authority within our engagement agreement. Otherwise, the client must execute trades on their own ("self-directed" trading). Clients can amend our account trading authority by providing our firm revised instructions via our platform.

Limited Investment Offerings

SocialTrader does not make available or offer advice with respect to proprietary products or a limited selection of types of products (i.e., only recommending a money market account, etc.).

Account Minimums and Other Requirements

As described in Items 4 through 7 of our Form ADV Part 2A firm brochure, we provide investment advisory services to individuals, high net worth individuals, small businesses, and retirement plan sponsors. We have a minimum asset level, account size and other requirements to open and maintain a performance-based fee account but no minimum asset level for portfolio management accounts. It is important to review the information about our fees and other criteria in Items 4 and 5 of our firm's Form ADV Part 2A for further details.

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- ☐ ***Given my financial situation, should I choose an investment advisory service? Why or why not?***
- ☐ ***How will you choose investments to recommend to me?***
- ☐ ***What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?***

What fees will I pay?

Depending on the services you select, you will pay us an asset-based fee for portfolio management that is billed monthly, in arrears; a performance-based fee paid quarterly in arrears; or a monthly fixed fee for our subscription services. Additional common fees which would be paid to the custodian could include account maintenance fees and transaction fees. Our firm does not charge or receive a commission or a mark-up on securities transactions, nor will the firm or an associate be paid a commission on the purchase of a securities holding. We do not receive SEC Rule 12b-1 fees ("trails") from a mutual fund company if we recommend mutual funds with those arrangements to a client of our firm. The more assets there are in a retail investor's advisory account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the retail investor to increase the assets in their account. You will pay fees to our firm and associated account costs whether you make or lose money on your investment. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

SocialTrader (CRD #326985)

Form ADV Part 3/Form CRS – November 2024

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Customer Relationship Summary November 2024

For additional information, please see Items 4 through 6 of our Form ADV Part 2A firm brochure which describe our services and fees in more detail, as well as Items 10 through 12 of our Form ADV Part 2A which discusses conflicts of interest as well as our Code of Ethics and standards of conduct.

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- ☐ **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. As described in Item 12 of our Form ADV Part 2A, we prefer that our portfolio management and performance fee clients use the services of Interactive Brokers LLC, a FINRA and SIPC member firm. Interactive Brokers LLC offers firms like ours various services, which include custody of client assets, trade execution, clearance, and settlement, etc. Our firm receives other benefits from our custodian through participation in their independent investment adviser support program. Additionally, when we are charging a fee for our portfolio management, our firm has an incentive to encourage clients to add assets even if the client would be better off keeping that money in savings, employer retirement plan, or another investment. SocialTrader serves as your fiduciary and we take our responsibilities seriously, and only intend to recommend investments we believe appropriate for each client. Please refer to Items 4 through 6, and 10 through 12 of our Form ADV Part 2A firm brochure for details about our services, fees, and potential conflicts of interest.

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- ☐ **How might SocialTrader's conflicts of interest affect me, and how will you address them?**

For additional information, please see our Form ADV Part 2A firm brochure which discusses this information in greater detail.

How do your financial professionals make money?

Our firm makes money by charging an asset-based fee or performance-based fee on accounts under our management, as well as a subscription fee for our investment strategy newsletter, as noted in Item 5 of our Form ADV Part 2A firm brochure. Other than our firm management, we do not have financial professionals on staff that receive a percentage of our earned fees. You could say we have "low overhead" in that regard.

Do you or your financial professionals have legal or disciplinary history?

No, neither the firm nor its management have reportable legal or disciplinary history. Please visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- ☐ **As a financial professional, do you have any disciplinary history? If Yes, for what type of conduct?**

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- ☐ **Who is my primary contact person? Is he or she a representative of an investment adviser? Who can I talk to if I have concerns about how this person is treating me?**

Other than our firm management, we do not have financial professionals on staff. All "client interaction" involving investing is conducted via our secure website.

For additional information about our services, please refer to our Form ADV Part 2A firm brochure which discloses the information in this customer relationship summary document and provides greater detail. If you would like additional, up-to-date information or a copy of this disclosure, please access our website.

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