

**SEC FORM ADV PART 2A: FIRM BROCHURE**



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**This brochure (“Brochure”) provides information about the qualifications and business practices of SigFig Wealth Management, LLC (“SigFig”). If you have any questions about the contents of this Brochure, please contact us at [support@sigfig.com](mailto:support@sigfig.com) or by telephone at 415-558-9611. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority, and references in this Brochure to SigFig as a “registered investment adviser” are not intended to imply a certain level of skill or training.**

**Additional information about SigFig is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **ITEM 2 – MATERIAL CHANGES**

This is the first version of this Brochure, which describes SigFig’s activities under commercial agreements (the “Partnerships”) with various financial institutions (the “Financial Institutions”) who utilize SigFig’s Digital Advice Program (described below) under agreements in which SigFig acts as a sub-advisor to the Financial Institution.

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## **ITEM 4 – ADVISORY BUSINESS**

### **A. General Description of Advisory Firm**

SigFig Wealth Management, LLC (“SigFig”) is a limited liability company that was founded in 2011 and is an SEC-registered investment adviser. SigFig is a wholly owned subsidiary of Nvest, Inc.

### **B. General Description of Advisory Services Offered**

#### **Sub Advisory Relationships**

Utilizing its proprietary web-based technology, SigFig acts as a sub-advisor to a number of financial institutions (the “Financial Institutions”). Financial Institutions may be registered investment advisers, banks, or broker dealers. The sub-advisory services are provided by SigFig through the use of its proprietary software, and a website operated and hosted by or on behalf of SigFig by the Financial Institution for the benefit of those clients of the Financial Institutions (“Digital Advice Investors”) who elect to receive such continuous investment advisory services (the “Digital Advice Program”).

In this capacity, SigFig’s services are limited to the following:

- (a) provide to prospective Digital Advice Investors a profile questionnaire (as prepared by the Financial Institution) that will provide the basis for the Financial Institution’s investment recommendations;
- (b) present investment recommendations to each prospective Digital Advice Investor as provided to SigFig from the Financial Institution;
- (c) implement, on a discretionary basis, such recommendations once the prospective Digital Advice Investor has opened an advisory program account with the Financial Institution; and
- (d) implement tax loss harvesting strategies in Digital Advice Investors’ accounts based upon preset criteria and specifications determined by the Financial Institution.

SigFig’s advice is currently intended to be limited to the foregoing in the context of the sub-advisory Digital Advice Program.

### **C. Tailoring of Advisory Services and Client Imposed Restrictions**

With respect to the sub-advisory Digital Advice Program, SigFig implements investment recommendations based on the information and specifications provided to it by the Financial Institution. The Financial Institutions – in formulating the investment recommendations delivered and implemented by SigFig –will comply with any reasonable instructions and/or restrictions made by the Digital Advice Investors when making recommendations for the Digital Advice Investors’ accounts, including the designation of securities that should not be purchased or held in the Account.

- If the Financial Institution believes that the restrictions are unreasonable or inappropriate, the Financial Institution will notify the Digital Advice Investor that, unless the restrictions are modified, the Financial Institution may remove the Digital Advice Investor’s account from the Digital Advice Program.
- Digital Advice Investors will not be able to provide restrictions that prohibit or restrict the purchase or sale of securities by the investment advisor of an ETF.

Digital Advice Investors are strongly encouraged to consider their individual circumstances, risk tolerance and needs prior to following any recommendation delivered through the Digital Advice Platform.

#### **D. Assets Under Management**

In the context of the sub-advisory Digital Advice Program, SigFig does not currently manage any Client assets in a discretionary or non-discretionary capacity.

## **ITEM 5 – FEES AND COMPENSATION**

### **A. Fees and Compensation**

With respect to the Digital Advice Program with Financial Institutions, SigFig's sources of revenue include a portion of the management fees charged to Digital Advice Investors by the Financial Institutions, as well as platform hosting and maintenance fees charged directly to the Financial Institutions. SigFig's agreement with its partner Financial Institutions may guarantee SigFig a minimum monthly, quarterly, or annual amount of management fees, such that the Financial Institution guarantees that minimum level of Management Fee revenues to SigFig, irrespective of whether the total Management Fees billed by the Financial Institution to the Digital Advice Investors – or SigFig's agreed upon share thereof – meets or exceeds that minimum.

Digital Advice Investors should pay particular attention to Item 5.C. below which describes other fees, not charged by SigFig, that Digital Advice Investors may incur from third parties that SigFig recommends through its Website or through its widget or co-branded pages of its media partners.

### **B. Fee Deduction**

SigFig is compensated by the Financial Institution. Management Fees are deducted from Digital Advice Investors' by the Financial Institution or account custodian fees are deducted in accordance with the Investment Advisory Agreement. Digital Advice Investors should read the Fees section of the Investment Advisory Agreement for a full description of fee calculations.

### **C. Other Fees and Expenses**

Digital Advice Investors may incur certain other standard fees and expenses billed by third parties. Such costs could include brokerage commissions, account opening fees, transaction fees, custodian fees, investment adviser fees, and other related costs and expenses that will be incurred directly by the Digital Advice Investor and billed according to standard rates. Digital Advice Investors should carefully review their agreements with the Financial Institutions for disclosures around fees.

### **D. No Prepaid Advisory Fees**

As noted above in 5.B., SigFig does not directly charge Digital Advice Investors for these services. Payment will be made to SigFig by the Financial Institutions in arrears, generally quarterly. With respect to the fees deducted from the Digital Advice Investors' accounts by the Financial Institution, Digital Advice Investors should read the fees section of their Investment Advisory Agreement for a full description of fee calculations.

### **E. Compensation for the Sale of Securities or other Investment Products**

As noted elsewhere in this Brochure recommendations made by the Financial Institution will, in certain cases, be executed by broker dealers affiliated with the Financial Institutions. As such, when the Digital Advice Investors' trade execution is directed to an affiliated broker dealer, Digital Advice Investors may not obtain rates as low as they might otherwise obtain if a different broker dealer were to be used. Also, such arrangements may cause the affiliated broker dealer to earn additional compensation (such as clearing and custody payments). Please, review the Intuitive Investor Program Brochure for more information.

SigFig addresses the potential conflict of interest related to broker dealers in numerous ways, including but not limited to the following:

- i. SigFig conducts due diligence on the broker dealers that it implicitly or explicitly recommends to Digital Advice Investors and seeks to ensure that the basis upon which SigFig purports to make its recommendation is accurate to the best of its knowledge when the recommendation is given.
- ii. In all cases, SigFig seeks to provide Digital Advice Investors with disclosures that it believes enables Digital Advice Investors to make informed decisions as to whether they should follow the recommendations provided.
- iii. As a fiduciary, SigFig has the obligation to seek “best execution” when trades are placed with broker dealers. Best execution entails the efficient placement of orders, clearance, settlement and the overall quality of execution as well as the cost of the transaction. SigFig, in cooperation with the Financial Institutions to whom it acts as a sub-adviser, monitors transaction results as orders are executed to evaluate the overall quality of execution provided by brokers and dealers used.

## **ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Not applicable to SigFig. SigFig does not charge performance-based fees.

## **ITEM 7 – TYPES OF CLIENTS**

Digital Advice Investors are generally individual investors who are seeking to optimize their investment portfolio, reduce their transaction costs, and/or hire an investment adviser within the context of their (typically) pre-existing relationship with the Financial Institution. Digital Advice Investors are not required to have a certain amount of investment experience, personal wealth or sophistication.

Prior to receiving investment advice from the Financial Institution and SigFig, Digital Advice Investors are required to open a Digital Advice Platform account and complete an advisory agreement. To register an account, a prospective Digital Advice Investor is required to provide the Financial Institution and SigFig with:

- Identifying Information (e.g., email and password);
- Responses to a questionnaire – designed by the Financial Institution – in order to determine which investment recommendations from the Financial Institution should be delivered to the individual Digital Advice Investor by SigFig and implemented by SigFig;
- An agreement to the Financial Institution and SigFig's Terms of Service; and
- An acknowledgement and agreement to the Financial Institution's and SigFig's Privacy Policies.



## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **A. Methods of Analysis and Investment Strategies**

As described in Item 4.B. SigFig's Digital Advice Platform delivers the investment advice formulated by its partner Financial Institutions to Digital Advice Investors using its proprietary software and a website operated and hosted by or on behalf of SigFig by the Financial Institution. 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 by the Financial Institution and delivered through SigFig's Digital Advice Platform.

Digital Advice Investors are strongly encouraged to conduct their own analysis of, and investigation into, the methodologies employed by SigFig in delivering the Financial Institution's recommendations. The fact that a recommendation from the Financial Institution is delivered by SigFig's proprietary technology cannot be interpreted as a guarantee of future performance. Investing in securities involves risk of loss that Digital Advice Investors should be prepared to bear.

### **B. Risk Factors**

When market conditions change such that SigFig's Digital Advice Platform and proprietary software determine that trades are necessary in order to follow the Financial Institution's investment strategy as referenced in 8.A. above, SigFig relies on third parties – possibly including the Financial Institution – for the provision of market statistics, fund details, performance, and related information. SigFig's proprietary software then uses this information to calculate the trades needed to rebalance the Digital Advice Investor's portfolio, and although these data providers are generally reliable and reputable, there may be inaccuracies or discrepancies in the information that is beyond SigFig's control.

SigFig provides the Financial Institution's recommendations to Digital Advice Investors based on proprietary software that utilizes various quantitative and qualitative models. Such computer-generated recommendations, like all investment recommendations, may be subject to system error. No guarantee or representation is made that the investment recommendations will be successful.

There is no guarantee that the Securities selected by the Financial Institution will achieve their objectives. The Securities share price fluctuates, and investors may lose money by investing in the 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, Digital Advice Investors should read the prospectus of the particular Security recommended.

SigFig's delivery of the Financial Institution's investment strategy does not generally consider the individual Digital Advice Investor's unique characteristics or circumstances. Investment recommendations are generated based upon the Digital Advice Investor's risk profile, as determined by the questionnaire designed by the Financial Institution and the Digital Advice Investor's responses to that questionnaire. Although SigFig, through its proprietary software, evaluates such information and data, SigFig 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.

### **C. Material Risks of Investing in Mutual Funds and ETF's**

***Exchange Traded Funds.*** 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. ETFs provide investors the opportunity to buy or sell throughout the day an entire portfolio of stocks in a single security. Although index mutual funds are similar, their shares are generally issued and redeemed only once per day at market close. 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.

***Mutual Funds.*** An investment in mutual funds could lose money over short or even long periods. Digital Advice Investors should expect the fund's share price and total return to fluctuate within a wide range, like the fluctuations of the overall stock market. A mutual fund's performance 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.

*Stock market risk*, the chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

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

## **ITEM 9 – DISCIPLINARY INFORMATION**

Neither SigFig nor any of its employees have had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. Neither SigFig, nor any of its employees, has had any proceedings before a self-regulatory organization.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. No Broker Dealer Affiliations**

Neither SigFig, nor any of its management persons are registered, or have an application pending to register as a broker dealer or a registered representative of a broker dealer.

### **B. No Affiliations with Futures Commission Merchants, Commodity Pool Operators or Commodity Trading Advisor**

Neither SigFig, nor any of its management persons are registered, or have an application pending to register as a Futures Commission Merchants, Commodity Pool Operators or Commodity Trading Advisor or an associated person of the forgoing entities.

### **C. Relationships Material to SigFig's Advisory Business**

Certain Financial Institutions in the Digital Advisory Program may be investment advisors, brokers, futures commission merchants, commodity pool operators or commodity trading advisors.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **A. SigFig's Code of Ethics**

SigFig has adopted a Code of Ethics (the "Code") which is designed to meet the requirements of Rule 204A-1 of the Investment Advisers Act of 1940 (the "Advisers Act"). The Code applies to SigFig's "Access Persons." Access Persons include, generally, any partner, officer or director of SigFig and any employee or other supervised person of SigFig who, in relation to the Digital Advice Investors, (1) has access to non-public information regarding any purchase or sale of securities, or non-public information regarding securities holdings or (2) is involved in making securities recommendations or has access to such recommendations that are non-public.

All SigFig employees and certain other individuals (including certain consultants) are deemed to be Access Persons.

The Code sets forth a standard of business conduct that takes into account SigFig's status as a fiduciary and requires Access Persons to place the interests of the Digital Advice Investors above their own interests. The Code requires Access Persons to comply with applicable federal securities laws. Further, Access Persons are required to promptly bring violations of the Code to the attention of SigFig's Chief Compliance Officer. All Access Persons are provided with a copy of the Code and are required to acknowledge receipt of the Code on at least an annual basis and any time material amendments are made.

As required by Rule 204A-1 of the Advisers Act, SigFig's Access Persons must provide SigFig's Chief Compliance Officer with a list of their personal accounts and an initial holdings report within 10 days of becoming an Access Person. SigFig also requires its Access Persons to report their securities transactions on a quarterly basis thereafter and disclose their securities holdings on an annual basis. SigFig restricts the personal trading of its Access Persons as reflected in the Code of Ethics.

The Code also includes insider trading policies and procedures that are designed to prevent the improper use of material, non-public information. Such insider trading policies and procedures prohibit SigFig and its personnel from trading for their personal account, or recommend trading in, any securities while in possession of material, non-public information about such security, and from disclosing such information to any person not entitled to receive it.

Digital Advice Investors or prospective Digital Advice Investors may obtain a copy of SigFig's Code by contacting the Chief Compliance Officer at [legal@SigFig.com](mailto:legal@SigFig.com).

### **B. Securities Recommendations**

Neither SigFig, nor any of its related persons, recommends to Digital Advice Investors, or buys or sells for Client accounts, securities in which SigFig has a direct material financial interest. SigFig does have investment authority to purchase or sell securities on behalf of Digital Advice Investors. However, SigFig's related persons may purchase securities for their own accounts which may, in certain instances, be the same Securities as those recommended to Digital Advice Investors.

The Code requires Access Persons to place the interests of Digital Advice Investors over their own

or those of SigFig, and all Access Persons are required to acknowledge their receipt and understanding of the Code.

### **C. Securities Transactions of SigFig and its Related Persons**

As stated above, SigFig does not buy Securities for its own account so no conflict exists at the firm level.

Access Persons may own Securities that are also owned by Digital Advice Investors. Certain Access Persons may be clients of SigFig and to the extent they are, they will receive recommendations at the same time as similarly situated Digital Advice Investors. Because SigFig's recommendations are based on an objective ranking engine, and are communicated to Access Person Clients and Digital Advice Investors that are not Access Persons at the same time, however, no actual conflict arises and Digital Advice Investors will not be prejudiced. In addition, SigFig only recommends mutual funds and ETF's, which are liquid and therefore generally would not create conflict of interest situations.

SigFig's Code also maintains policies and procedures to prevent insider trading that are designed to prevent the misuse of material, non-public information. SigFig personnel are required to certify their compliance with the Code.

### **D. Recommending Securities to Clients**

As mentioned in Item 11C, SigFig does not buy securities for its own account. Therefore, no potential conflict of interest exists at the firm level. Access Persons may desire to trade securities that the firm is trading for Digital Advice Investors but, for the reasons described in Item 11C, no actual conflict arises and any common investments are not at the prejudice of the Digital Advice Investors.

## **ITEM 12 – BROKERAGE PRACTICES**

### **A. Broker Dealer Selection**

As noted elsewhere in this Brochure, recommendations made by the Financial Institution will, in certain cases, be executed by broker dealers affiliated with the Financial Institution. As such, at times the trade execution is directed to an affiliated broker-dealer, Digital Advice Investors may not obtain rates as low as they might otherwise obtain if a different broker-dealer is used. Also, such arrangements may cause the affiliated broker-dealer to earn additional compensation (such as clearing and custody payments). Please, review the Intuitive Investor Program Brochure for more information.

SigFig does not plan to, but may, receive research and services from brokers and dealers as a part of commission rates paid to brokers and dealers. Any research and services SigFig receives will be in compliance with Section 28(3) of the Securities Act of 1934.

## **ITEM 13 – REVIEW OF ACCOUNTS**

### **A. Periodic Review of Client Accounts**

SigFig continuously reviews the accounts of the Digital Advice Investors.

Digital Advice Investors are strongly encouraged to conduct their own analysis of, and investigation into, the methodologies employed by the Financial Institution in making its recommendations. The fact that a recommendation is generated by the Financial Institution and implemented or delivered by SigFig cannot be interpreted as a guarantee of future performance. Investing in securities involves risk of loss.

### **B. Reports Given To Digital Advice Investors**

With respect to the sub-advisory Digital Advice Program SigFig coordinates with the relevant Financial Institution to provide relevant summary emails to Digital Advice Investors.



## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

SigFig maintains a relationship with Cambridge Savings Bank (“CSB”) under what is known as a solicitor’s agreement. This means that CSB may refer its banking clients to SigFig for discretionary advisory services in return for compensation. Under the terms of the solicitor’s agreement, CSB must provide to its clients a standard written solicitor’s disclosure document and this Form ADV Part 2A consistent with Rule 275.206(4)-3 under the Advisers Act.

To the extent SigFig does enter into any other arrangements, all such compensation will be fully disclosed to each Client consistent with applicable law and to the extent necessary will be conducted in accordance with SEC Rule 206 (4)-3 under the Advisers Act, as well as relevant guidance.

## **ITEM 15 – CUSTODY**

SigFig does not have custody over the Digital Advice Program accounts. The Financial Institutions, their affiliate(s), or a third-party custodian of the Financial Institution's choosing will maintain custody of the securities and cash comprising each account. Clients will receive quarterly, or more frequent, account statements directly from the Custodian. Digital Advice Investors should review the statements carefully and compare to the reports, if any, provided by SigFig.

## **ITEM 16 – INVESTMENT DISCRETION**

With respect to the Digital Advice Program, SigFig’s investment discretion is limited to executing the investment recommendations as provided to SigFig by the Financial Institution.

## **ITEM 17 – VOTING CLIENT SECURITIES**

SigFig does not vote proxies on behalf of the Digital Advice Investors. SigFig does not have the authority to vote Digital Advice Investors' securities.

## **ITEM 18 – FINANCIAL INFORMATION**

SigFig is not currently aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to the Digital Advice Investors.