

**Item 1 Cover Page**



Datalign  
One Kendall Square B2102  
Cambridge, MA 02139

[www.DatalignAdvisory.com](http://www.DatalignAdvisory.com)

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**This brochure provides information about the qualifications and business practices of Datalign. If you have any questions about the contents of this brochure, please contact us at (781) 228-5678. 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. Registration as a registered investment adviser does not imply a certain level of skill or training.**

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

## **Item 2 Material Changes**

There have been no material changes to this Brochure since the date of the initial filing noted below.

The material changes discussed above are only those changes that have been made to this Brochure since the firm's initial filing of the Brochure. The date of the initial filing of the Brochure was October 21, 2021.

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#### **Item 4 Advisory Business**

Datalign is a technology-based firm designed to match prospective investors (“Investors”) with unaffiliated investment advisers based on the Investor’s self-reported personal financial information, location, required services and desired relationship with an adviser. Datalign was formed in September 2021 and its principal owner is Impact Ready Holdings, LLC. Impact Ready Holdings, LLC is indirectly owned by David Blundin.

Datalign serves as an adviser for Investors seeking introductions to third-party investment advisers. Datalign does not manage Investors’ assets, and the advice it provides is limited to matching Investors with suitable third-party investment advisers that have elected to participate in Datalign’s matching platform (“Participating Advisers”). Datalign utilizes questionnaires that Investors are required to complete regarding the Investor’s personal and financial circumstances, including the Investor’s age, state of residence, investable assets, income, desired services, desired relationship with an adviser, and investment risk tolerance. Participating Advisers are screened for current state or federal registration status, disciplinary history, and advisory services offered. Participating Advisers are interviewed to determine their areas of expertise with regard to financial planning. The information that is collected allows Datalign to form an initial basis for a match between an Investor and Participating Adviser that meets the Investor’s specifications, based the information provided by the Investor and Participating Advisers. An Investor is then introduced to a suitable Participating Adviser through the Datalign platform. Once Datalign introduces an Investor to a Participating Adviser, the Investor and Participating Adviser will communicate outside of the Datalign platform and determine whether or not they would like to engage in an investment advisory relationship together.

In consideration for making introductions, Datalign is paid a fee by each Participating Adviser. As a result, Datalign’s business model includes an inherent conflict of interest because it has an incentive to introduce an Investor to a Participating Adviser even if a suitable Participating Adviser is not available. Datalign makes no guarantee that each introduced Participating Adviser will be successful in managing the assets of any particular Investor, nor does it make suitability determinations about any such strategy, product, or offering for a particular Investor. However, Datalign is a fiduciary to Investors and Participating Advisers and as a fiduciary is obligated to place its clients’ interests of its own in every situation. If no Participating Advisers are deemed appropriate by Datalign based on an Investor’s profile, no introduction will be made.

Datalign does not provide any advice regarding specific investments or securities, nor does it participate in the management of Investors’ accounts. Although Datalign makes introductions it believes are suitable based on the information provided by the Investor and Participating Adviser, it does not analyze or recommend particular strategies or offerings of a Participating Adviser, or make suitability determinations about any such strategy, product, or offering for a particular Investor. Further, Datalign does not assess the fees charged by Participating Advisers, although Datalign will review Participating Advisers’ fee schedules during the initial screening and interview process. Datalign will only introduce Investors to Participating Advisers, and Investors should be aware that other investment advisers not on Datalign’s platform may be more suitable for the Investors specifications and financial circumstance. Datalign does not maintain an ongoing

client relationship with Investors. For a more fulsome discussion of Datalign's methods of analysis, please refer to Item 8 below.

Except for the verification of Investors, Datalign provides all of its services to Investors solely through its interactive website. Datalign only introduces Investors to Participating Advisers with which it has referral agreements. Investors are not obligated to engage with any Participating Adviser that is matched through the Datalign platform.

Datalign does not provide portfolio management services to wrap fee programs.

Since Datalign does not manage Investors' assets or have the ability to hire or fire managers on behalf of its Investors, Datalign does not have regulatory assets under management.

### **Item 5 Fees and Compensation**

Datalign does not charge fees to the Investors that participate on Datalign's platform. However, Investors will likely incur fees or charges that are imposed by third parties, unaffiliated with Datalign, in connection with any services they choose to receive from a Participating Adviser. Participating Advisers pay Datalign a referral fee in connection with each introduction made through the Datalign platform. The referral fee is a one-time fee that is paid to Datalign whether or not the Investor ultimately decides to enter into an advisory relationship with a Participating Adviser. The referral fee will be paid to Datalign either at the time of the introduction or at the end of the month in which the introduction was made, depending on the terms of the referral agreement that Datalign maintains with the respective Participating Adviser.

Datalign is paid by Participating Advisers for each introduction, and Datalign will only receive compensation if an introduction is made. This creates a conflict of interest, as Datalign has an incentive to introduce Investors to Participating Advisers even if a suitable Participating Adviser is not available. Datalign mitigates this conflict by only introducing Investors to Participating Advisers that are deemed suitable and match based on information Investors self-report through the Datalign platform. In the event that multiple Participating Advisers meet the requirements identified by an Investor and are determined to be equally suitable, the introduction will be made to the Participating Adviser that is willing to pay Datalign the highest referral fee, as determined through an auction.

Neither Datalign nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **Item 6 Performance-Based Fees and Side-by-Side Management**

Datalign does not charge performance-based fees.

## **Item 7 Types of Clients**

Datalign matches individual Investors to suitable Participating Advisers. Participating Advisers must be registered investment advisers either with the SEC or one or more state securities regulator. There are no minimum requirements for Investors to use the Datalign platform.

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

Datalign does not manage assets for Investors, and therefore does not employ any investment strategies. Investors should refer to the Form ADV Brochure of any Participating Adviser to which it receives an introduction in assessing the advisory services offered and related methods of analysis and applicable risks.

Datalign utilizes questionnaires that Investors are required to complete, which allow Datalign to make informed recommendations and introductions to Participating Advisers. This questionnaire covers information including, but not limited to: age, investable assets, income, time to retirement, location, desired services, and risk tolerance. Each Participating Adviser also completes a questionnaire regarding its preferred Investor profile, advisory services it offers, and is screened for appropriate State or Federal registration status. Datalign also screens the Participating Advisers that participate with the matching platform for certain disciplinary issues. Datalign reviews and considers any disciplinary issues of prospective Participating Advisers, as necessary. The information provided by Investors and Participating Advisers is then used to form the basis of an initial introduction.

## **Material Risk Factors**

*Investing in securities involves risk of loss that Investors should be prepared to bear.*

### Reliance on Participating Advisers:

The investment success of Investors utilizing Datalign's platform is substantially dependent upon the skills of an introduced Participating Adviser and its personnel in sourcing, selecting, and monitoring investments. There can be no assurance that a Participating Adviser will successfully identify investments that fulfil an Investor's investment objective or that a Participating Adviser's investment recommendations will not cause the Investor to experience investment losses. Any prior success of a Participating Adviser or its personnel should not be construed as assuring any level of future success or profitability. Datalign does not monitor or review the Participating Advisers' past performance. Datalign does not monitor the Investor's account, or any other accounts managed by Participating Advisers. Datalign also does not analyze or recommend particular strategies or offerings of a Participating Adviser, or make suitability determinations about any such strategy, product, or offering for a particular Investor, nor does Datalign assess Participating Advisers' fees. Accordingly, when considering whether to become an advisory

client of a Participating Adviser, Investors should carefully review the Participating Adviser's Form ADV, Form CRS, and any other disclosure documents.

#### Potential of Loss:

An investment with a Participating Adviser may entail a high degree of risk. There is no assurance that Participating Advisers will achieve the investment objective of any Investor or that the strategies or recommendations offered by a Participating Adviser will be successful. Given these factors, there exists a possibility that an Investor could suffer a substantial or total loss as a result of an investment with any Participating Adviser matched and introduced by Datalign.

#### Cybersecurity and Disaster Recovery:

Cyber incidents (including cyber attacks) affecting Datalign and its various service providers have the ability to disrupt and impact business operations, potentially resulting in interference with Datalign's ability to provide suitable matches and introductions to Investors, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage or additional compliance costs. 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, or 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). Similar adverse consequences could result from cyber incidents affecting Participating Advisers, counterparties which engage in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies, other financial institutions and other parties. In addition, substantial costs may be incurred in order to prevent any cyber incidents in the future.

While Datalign's continuity plans and risk management systems are designed to prevent and mitigate cyber incidents and other disasters, there is no assurance that any of these disaster recovery plans will work. Furthermore, Datalign cannot control the cyber security plans and systems put in place by its service providers or any other third parties whose operations may affect an Investor or Participating Adviser. As a result, Investors and Participating Advisers could be negatively impacted.

An investment with a Participating Adviser matched and introduced by Datalign may entail a high degree of risk. There can be no assurance that Participating Advisers will achieve the investment objective of any Investor or that the strategies offered by a Participating Adviser will be successful. Given these factors, there exists a possibility that an Investor could suffer a substantial or total loss as a result of an investment with any Participating Adviser matched and introduced by Datalign.

#### Reliance on Technology:

The Datalign platform relies on a variety of computer hardware and software systems and platforms, some of which may be proprietary while others may be licensed from third parties (such systems and platforms, collectively, "Computer Systems"). Incorrect data, including stale or missing data, hardware or software malfunctions, programming inaccuracies, and similar errors may impair the performance of Computer Systems, which may negatively affect introductions to Participating Advisers. The platform utilized by Datalign is fundamentally dependent on

technology, including hardware, software and telecommunications systems. The data gathering, risk management, operational, back office and accounting systems, among others, utilized by Datalign are all highly automated and computerized. Such automation and computerization is dependent upon an extensive amount of proprietary software and third-party hardware and software. Such software and hardware are known to have errors, omissions, imperfections and malfunctions. These errors, omissions, imperfections and malfunctions are generally entirely outside of the control of Datalign. To the extent that a software or hardware malfunction or problem is caused by a defect, security breach, virus or other outside force, the Investors and Participating Advisers may be materially adversely affected.

#### Acts of God and Geopolitical Risks:

The performance of Investors' accounts 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.

The extent of the impact of any such Disruptions on Datalign, Participating Advisers, and potentially Investors' assets, will depend on many factors, including the duration and scope of such Disruptions. In addition, there is a risk that a Disruption will significantly impact the operations of Datalign, the Participating Advisers, and the underlying portfolio companies in an Investor's account, or even temporarily or permanently halt their operations.

### **Item 9 Disciplinary Information**

Neither Datalign nor its management persons have any legal or disciplinary events to report in response to this item.

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

Neither Datalign 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.

Neither Datalign nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Datalign does not currently have any relationships or arrangements that are material to its advisory business with any related persons. Datalign does, however, enter into relationships with unaffiliated internet companies that market Datalign's platform and/or otherwise host Datalign content on their websites.

Datalign matches and introduces Investors to Participating Advisers as described in Item 4 above. Datalign is only compensated by the Participating Advisers for the introduction and is not paid any



fees by the Investor. As a result of this business model, Datalign has a conflict of interest that is described in Items 4 and 5 above.

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

Datalign has adopted a Code of Ethics pursuant to SEC rule 204A-1. This Code of Ethics sets forth the basic policies of ethical conduct for all of Datalign's employees. In addition, the Code of Ethics governs personal trading by each employee of Datalign deemed to be an "access person" and is intended to ensure that securities transactions effected by access persons of Datalign are conducted in a manner that avoids any conflict of interest between such persons and the Investors. Datalign collects and maintains records of securities holdings and securities transactions effected by these access persons. Datalign will provide a copy of the Code of Ethics to any Investor upon request.

Datalign does not recommend to Investors, or buy or sell for any Investor's accounts, securities in which the firm or a related person has a material financial interest.

Datalign has no registered investment adviser representatives.

### **Item 12 Brokerage Practices**

Datalign serves as an adviser for Investors seeking introductions to third-party investment advisers. Datalign does not manage Investors' assets, and the advice it provides is limited to matching Investors with suitable Participating Advisers. Datalign does not place transactions for or on behalf of Investors and therefore, does not select or recommend broker-dealers or custodians to Investors, nor does it otherwise engage in brokerage practices.

### **Item 13 Review of Accounts**

As described above, Datalign's business is limited to matching and introducing Investors to Participating Advisers. Datalign does not have ongoing relationships with Investors and therefore does not provide either initial or ongoing review of Investor accounts or assets. The decision as to whether to become a client of a Participating Adviser is solely that of the Investor. After the introduction is made, Datalign does not assess whether a particular strategy, product, or offering of a Participating Adviser is suitable for a particular Investor, nor does Datalign assess the Participating Adviser's fees. Rather, Datalign provides point-in-time introductions based on the criteria discussed in Items 4 and 8 above, and does not assess whether a Participating Adviser or its services continue to be appropriate for an Investor after the introduction is made. Datalign also does not provide regular reports to Investors.

### **Item 14 Client Referrals and Other Compensation**

Datalign is compensated by Participating Advisers for matching Investors and making introductions as described in Item 5. Datalign maintains marketing relationships with third-party internet companies that market Datalign's platform and/or otherwise host Datalign content on their

websites. Datalign compensates these third-party entities in proportion to the profits that Datalign receives in connection with their services.

#### **Item 15 Custody**

Datalign does not have custody of Investor funds or securities.

#### **Item 16 Investment Discretion**

Datalign does not have investment discretion.

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

Datalign does not vote, or advise Investors how to vote, proxies for securities. Datalign will not give any advice or take any action with respect to the voting of proxies, and does not participate in class actions on behalf of Investors. Datalign encourages Investors to discuss the proxy and class action policies with any Participating Adviser they employ.

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

Datalign does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Datalign has never been subject to a bankruptcy petition.