

Positively LLC (“Positively”, the “Firm” or “we”) is registered as an investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me with?

Positively’s proprietary web-based personality profiling platform combines the principles of positive psychology with modern wealth management to enable you to develop personality profiles based on your responses to a profile questionnaire made available on Positively’s website. Positively seeks to create stronger connections between you, your advisors and your wealth. Using the personality profile, Positively builds personalized portfolios that reflect your unique profile, personalizing the investment experience with recommendations and/or analysis of exchange-traded funds (“ETFs”) and mutual funds based on your profile, and facilitating connections.

Pursuant to Positively’s Terms of Use, Positively provides you the ability to complete the profile questionnaire, discover your profile and receive investment recommendations. If you are working together with a financial advisor, you may also link your external brokerage accounts to the platform for easy access to trade execution. In certain circumstances, your advisor may also engage Positively to provide discretionary investment advisory services over some or all of the brokerage accounts you link to the platform. In the future, Positively intends to provide you with the option to use the platform to be matched with other investment advisers on Positively’s platform who have paid for such sponsorship.

Positively builds personalized portfolios for you based on assessments of your risk profile to determine allocation and volatility, and further personalizes the recommended portfolios to contain specific themes the you have selected. Positively does not generally have discretionary authority over your account, which means we do not determine the securities that you buy or sell, the amount of securities that you buy or sell, the broker-dealer you use for your purchase or sale of securities, and commission rates that you pay to a broker-dealer in your account. You should be aware that your individual accounts are not actively monitored directly by investment advisory personnel.

If your advisor engages Positively as a sub-advisor to provide discretionary investment advisory services to your account, Positively will have discretionary authority to invest and trade your assets in ETFs and/or mutual funds, subject to any specific limitations set forth in the sub-applicable sub-advisory agreement, using the external brokerage accounts you have linked to the platform. If Positively has discretionary authority over your individual accounts, your accounts will be monitored at least quarterly by Positively’s Research Team.

Requirements to Open and Maintain an Account: Positively provides the profile questionnaire, delivers profiles and makes certain investment recommendations regarding ETFs and mutual funds without charge.

For additional information regarding our investment advisory services, please see Items 4 and 8 of our Form ADV Part 2A (our “Firm Brochure”).

CONVERSATION STARTERS. Questions you should ask investment advisers like us:

- *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?

Positively provides the profile questionnaire, delivers profiles and makes certain investment recommendations regarding ETFs and mutual funds at no charge.

If Positively begins to offers the matching services as described above and if you choose to use Positively’s platform to be matched with investment advisers who are clients of Positively (the “IA Clients”), Positively expects to charge a one-time cost-per-lead fee (the “Matching Fee”) to the IA Client for each individual client that Positively seeks to match with IA Client, but may elect a different pricing structure. The IA Clients (i.e. the investment advisers) are charged for Positively’s Matching Fees. Positively provides you the option to use such matching services for no charge.

If your financial advisor is an IA Client that engages Positively to provide sub-advisory services to your accounts, Positively generally receives a portion of the management fees charged to you by your financial advisor, based on assets under

management (the “Management Fee”). The Management Fee is negotiated between Positivly and your advisor in advance and is generally 20 basis points per year. Your advisor may also be subject to an initial set-up fee.

Fees are subject to negotiation and vary among clients. Positivly’s fees do not include any custodial or brokerage expenses that a client’s custodian or broker may charge. You will typically pay transaction and/or custodial expenses in connection with implementing any of Positivly’s recommendations. These transaction and/or custodial expenses vary and are based on your agreement with your account custodian and/or broker-dealer. Please refer to Item 5 of our Firm Brochure as well as the Terms of Use and your advisory agreement for a full disclosure of relevant fees, costs and expenses.

You will pay fees and costs whether you make or lose money on your investments. 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.

CONVERSATION STARTER. A question you should ask investment advisers like us:

- *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 about these conflicts because they can affect the investment advice we provide to you.

For example, certain IA Clients may wish to use Positivly’s matching services to be matched with individual clients based on the individual clients’ profiles. Because of such partnerships, our platform is more likely to present these IA Clients as matches to individual clients. Such matching does not imply that any such matched IA Clients are more appropriate for individual clients as compared to other investment advisors, whether on Positivly’s platform or otherwise, only that such advisors have paid for matching services. Positivly does not receive any additional compensation from an IA Client if you elect to engage such IA Client (i.e. Positivly only receives the Matching Fee for presenting an individual client as a match for the IA Client, regardless of whether you choose to invest with any IA Client). You are strongly encouraged to conduct your own analysis and assessment of a particular IA Client, including their fees for investment advisory services, prior to engaging the services of such IA Client.

For additional information regarding our management of potential conflicts of interests, please see Item 10 of our Firm Brochure.

CONVERSATION STARTER. A question you should ask investment advisers like us:

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

We do not employ financial professionals or financial advisors to provide investment advice. Our investment services are entirely managed by software. Positivly’s sources of revenue include Management Fees received in connection with exercising discretionary investment authority over certain client accounts, if authorized by an IA Client. Our IA Clients pay us Portfolio Fees in exchange for utilizing services made available through our platform. Certain IA Clients who choose to use our matching services may also pay Matching Fees.

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

No. For further information, please visit Investor.gov/CRS for a free and simple search tool where you can research us and our financial professionals.

Additional Information

If you would like additional information about our services or to request a copy of the relationship summary, please contact us at info@positivly.com.

CONVERSATION STARTER. A question you should ask investment advisers like us:

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