

DISCLOSURE BROCHURE

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CRD No. 336317

Disclosure Brochure

(Form ADV Part 2A)

August 19, 2025

Item 1: Cover Page

This disclosure brochure (“Disclosure Brochure” or “Brochure”) provides information about the qualifications and business practices of AdvisorEngine Portfolio Solutions Inc. (“AEPS” or the “Firm”). If you have any questions about the contents of this Brochure, please contact us at the phone number or email listed above. 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.

AdvisorEngine Portfolio Solutions Inc. is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about AdvisorEngine Portfolio Solutions Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov. You can conduct a Firm search using our [CRD Number](#) provided above.

Item 2: Material Changes

Not applicable

You may request a current copy of our Brochure at any time without charge by contacting us as described in [Item 1: Cover Page](#).

You may also obtain a copy of our current Brochure at www.adviserinfo.sec.gov. You can conduct a Firm search using our [CRD Number](#) provided above.

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Item 4: Advisory Business

Firm Overview

AdvisorEngine Portfolio Solutions Inc. (“AdvisorEngine Portfolio Solutions,” “AEPS” “We” or the “Firm”) is a registered investment adviser registered with the United States Securities and Exchange Commission. We are a corporation organized in the State of Delaware in January 2025, and a wholly-owned subsidiary of FT FinTech Holdings LLC. AdvisorEngine Inc., an affiliate of AEPS, provides the AdvisorEngine technology platform used by financial advisers to manage their wealth management practice as described herein and is outside the scope of this Disclosure Brochure as it is a financial-technology only offering.

Turnkey Asset Management Program

We provide a turnkey asset management program (the “Program,” “TAMP Program” or “TAMP platform”) through which we offer investment management services, more fully described below.

As used in this Brochure, “we,” “us,” and “our firm,” refers to AdvisorEngine Portfolio Solutions, and “you,” “your” or “client” refers to third party advisory firm clients who participate in our Program through their advisory firms (collectively “clients”).

The Program is made available to you through an arrangement between us and your investment advisory firm (“Advisory Firm”). This arrangement allows your investment adviser representative (“Adviser” or “Advisor”) affiliated with the Advisory Firm to select from TAMP Program offerings as described in Item 8 (“Investment Strategies” or “Investment Strategy”) to be used to manage some or all of your investment assets. We are responsible for conducting initial and ongoing due diligence of the investment options available through the TAMP Program.

Your Adviser is responsible for gathering sufficient information from you to evaluate your financial situation, profile, investment objectives, financial goals, tolerance for risk, and investment time horizon (“Investment Objectives” or “Investment Considerations”). Because the management of your investments is based on your financial circumstances, it is important that you provide complete and accurate information to your Adviser particularly as your circumstances or risk tolerance changes. Your Adviser is also responsible for determining whether your participation in the Program is appropriate for you, and for selecting an Investment Strategy to be used in managing your assets aligned with your best interests including costs and investment fit. You will establish a brokerage and custody account with a qualified custodian chosen by you or your Adviser, as described further in Item 12 herein.

Once your Adviser selects your Investment Strategy, your investment and custody account (“account”) will be managed on a discretionary basis by us and our sub-advisor SMArtX Advisory Solutions LLC (“SMArtX”) or a third party manager according to the mandate of the selected Investment Strategy. SMArtX, under the terms of a sub-advisory agreement with us (the “Sub-Advisory Agreement”), will maintain responsibility to monitor and periodically send alerts to your Advisor to rebalance your account as necessary to keep your account within the mandate of your selected Investment Strategy. We will conduct initial and ongoing due diligence of SMArtX to monitor and review SMArtX’s performance under the Sub-Advisory Agreement. We will also maintain discretionary authority over your account and will exercise our discretionary authority if SMArtX’s management is inconsistent with the Advisory Firm or Advisor’s instructions, or in the

event the Sub-Advisory Agreement between us and SMArtX is terminated. For more information about SMArtX's advisory services, please refer to its Form ADV.

Your Adviser will meet with you at least annually, although quarterly contact is encouraged, to discuss any changes to your financial circumstances that may affect your account, or the Investment Strategy used to manage your account. You should promptly contact your Adviser when any changes occur in your financial circumstances that may affect the manner in which your account is invested.

Any questions regarding the management of your account should be directed to your Adviser. If necessary, your Adviser will communicate with our personnel.

If you or your Adviser decide that the selected Investment Strategy no longer meets your investment needs, your Adviser may select another Investment Strategy. Your Adviser will communicate that selection to us. SMArtX, our sub-adviser, will be responsible for allocating your account to the new Investment Strategy. We will provide diligence and oversight of SMArtX's discretionary management.

If an Investment Strategy is removed from the Program, we will notify your Advisory Firm of the change and request that action be taken to reassign your account by a specified date. If no action is taken by your Advisory Firm, we reserve the right to map your account to an alternative Investment Strategy or model portfolio allocation. Your Advisory Firm's failure to act is considered consent to the mapping of your account to an alternative Investment Strategy.

You may place reasonable restrictions on specific securities or types, sectors, or industries of securities to be held in your Investment Strategy. These reasonable restrictions will be communicated to us by your Adviser. We will make a reasonable attempt to honor any reasonable restrictions you wish to impose, but in the case of pooled investment vehicles such as mutual funds or ETFs where underlying holdings change frequently, we cannot guarantee that restrictions will always be enforced. In general, SMArtX will exercise its discretionary authority to implement restrictions by either (a) increasing the relative proportions of other securities to replace the restricted security, or (b) increasing money market or cash positions in your account. Such restrictions imposed on your account would likely cause the performance of your account to differ from the performance of other accounts in the Investment Strategy.

Model Marketplace

The Model Marketplace is available in conjunction with the TAMP Program. To employ the [Model Marketplace](#), Advisory Firms are required to enter into a sub-advisory agreement with us, which further details the services and fees for the Program. The Model Marketplace is a platform through which we provide Advisory Firms access to model portfolios created by affiliated and unaffiliated third-parties ("model providers", "Model Providers," "Model Managers" or "strategists" as defined herein). Each investment portfolio designed to track a stated investment model ("model portfolio" or "model") is provided by either AEPS/SMArtX, a traditional asset manager, a hedge fund or alternative investment manager, or an index provider (each a "Model Manager"). The Model Marketplace model portfolios designate allocations to specific investments. We are responsible for selecting the model portfolios that are available through the Model Marketplace ("AEPS Access and Select Lists").

Your Advisory Firm may use a Model Marketplace model portfolio to manage all or part of your assets. Your Advisory Firm is responsible for determining the suitability of any Model Marketplace model portfolio that is assigned to your account and whether it is aligned with your best interests. Please review such allocations with your Advisor at least quarterly as your needs change.

Once the Advisory Firm selects the model portfolio, we will provide ongoing supervision of your account and will have discretion over your account within the parameters of the model portfolio and the Advisor's investment decisions. With regard to rebalancing, our sub-advisor SMArtX, using its technology, will provide alerts to the Advisory Firm based on the drift parameters to bring the account in balance with the selected model portfolio(s), Investment Strategies and/or Investment Strategy. AEPS will monitor this process to help ensure alerts are operating as intended and your Advisory Firm is taking action as needed. We will also maintain discretionary authority over your account and will provide oversight of SMArtX's discretionary management.

Within an account, Advisory Firms may choose to direct AEPS or its sub-advisor to buy or sell individual securities in the account directly rather than through a model portfolio. This functionality is called Advisor as a Portfolio Manager ("APM") and allows Advisors to direct a limited portion of the account assets rather than opening a separate account with a custodian. Advisors may choose to buy or sell stocks, exchange traded funds ("ETFs"), mutual funds, or other assets available for investment such as bonds, cash management vehicles or other fixed income investments or digital assets. If an Advisor directs AEPS to buy or sell individual securities, SMArtX will implement that instruction, and we will provide oversight of SMArtX's management including within the APM portion of the account. AEPS oversight will be conducted through its Investment Committee which will, among other things, complete due diligence on SMArtX trading practices to monitor adherence with fiduciary duties such as best execution.

If the model portfolio is updated, SMArtX and your Advisor have the discretion to make transactions in your account as necessary to align with the updated model portfolio. We will provide oversight of SMArtX and your Advisor to help ensure that your account aligns with any changes to the applicable Access and Select List model portfolios and/or any instructions by your Adviser. Provided however, your Advisor, in the APM service, will maintain primary day-to-day responsibility for periodically rebalancing your account to portfolio targets except for fixed income strategies whereby our sub-advisor, SMArtX will maintain primary day-to-day responsibility for periodically rebalancing your account to fixed income portfolio targets.

Product offerings from our affiliated investment advisors (collectively, "Franklin Templeton"), including from Franklin Templeton Institutional LLC and Franklin Advisers, Inc. (referred at times as a brand name "Franklin Templeton Investment Solutions" or "FTIS") including, without limitation, investment strategies and customized and standard model portfolios are included in the TAMP Program. From time to time, additional product offerings from other affiliates of AEPS may be included in the TAMP program. For more information, please refer to the Forms ADV of Franklin Templeton Institutional LLC's and Franklin Advisers, Inc. (for FTIS products).

Franklin Templeton does not receive a fee for developing and updating model portfolios; however, Franklin Templeton has a financial interest in the models as they include funds for which a Franklin Templeton entity serves as investment adviser, and from which Franklin Templeton or its affiliates receives fees for investment management, distribution, shareholder servicing, and transfer agent services. Neither AEPS, Franklin Templeton, nor its affiliates conducts investor

suitability analysis regarding the model portfolios or their underlying investments. Suitability determinations are the responsibility of your Adviser.

As a wholly owned subsidiary of Franklin Resources, Inc., AEPS and its affiliate AdvisorEngine Inc. (“AE”) will benefit from the success of products and services offered by Franklin Templeton; accordingly, AEPS and AE have an incentive to offer Franklin Templeton-sponsored products including within the TAMP Program and/or Model Marketplace. This creates a potential conflict of interest for us. To address this conflict, AEPS requires that your Adviser, not AEPS, selects Investment Strategies and model portfolios for you. Your Adviser, not AEPS, will ensure recommendations fit your stated Investment Objectives. In addition, AEPS will provide the same services, including oversight of services performed by SMArtX, regardless of whether or not Franklin Templeton-sponsored products are included in your portfolio.

Excluding index providers, each Model Manager is registered either with the SEC or one or more state securities regulators as required. A Model Manager provides SMArtX with securities and weights associated with the model in order for SMArtX to create and maintain the model portfolio. We will provide oversight of your Adviser and SMArtX’s implementation of the model portfolios. AEPS conducts its oversight primarily through its Head of the business and designated operations personnel. The Investment Committee process will oversee certain investment processes in accordance with Investment Policies and Procedures.

Each Model Manager provides additional content (“Model Manager Content”), including but not limited to commentaries on the model portfolio and the underlying investment strategy, general commentaries on the markets and the economy, historical performance, biographical information on relevant members of the Model Manager’s team, and descriptions of the Investment Strategy or Strategies utilized in the Model. All Model Manager Content represents the opinions of the Model Manager providing the content, and should not be construed as personalized advice, and is subject to change without notice.

AEPS provides access to Model Manager Content and historical performance with relevant performance metrics for each model portfolio available on the TAMP Platform. Your Adviser will review the information available to select one or more models. When your Adviser selects a model, your Adviser will provide the amount of funds, either in terms of dollars or as a percent of the account’s value, to be invested in the model. When you invest in a model portfolio, the positions and trading activity of the model portfolio will be based on the individual security percent allocations in the model. In certain circumstances, i.e. minimum investment in a security, the allocation percentage may not be fully matched.

Your Advisory Firm is responsible for determining whether any model portfolio or any combination of model portfolios, Investment Strategies and investment options are appropriate and suitable for you, the account holder’s, Investment Objectives. Advisers are obligated to consider the Investment Objectives of the account holder to determine if the selected model portfolio(s) are appropriate. Advisers are responsible for reviewing any changes to the Investment Considerations of the account holder and making appropriate changes to the selected model portfolio(s).

Your Adviser may provide us instructions to restrict the purchase or sale of certain securities from the account. We will engage with your Adviser to determine whether such restrictions are practicable; SMArtX will be responsible for applying agreed-upon restrictions to your account. Additionally, your Adviser may provide instructions to harvest taxable gains or losses in the account.

Certain model portfolios may employ leverage. An Adviser may add or decrease leverage for any selected model portfolio; provided however, SMArtX can limit the leverage utilized to the account's specified account configuration such as in adherence with the qualified custodian's margin policy and agreement. For example, if an account has Regulation T margin, you or your Adviser may choose to use leverage up to two times (2x) the account value.

Finally, if a model portfolio invests in a security or other asset that does not fit with an account configuration, we will instruct SMArtX to exclude that investment from the account and we will monitor SMArtX's implementation of that instruction. Any of these customizations that are specific to an account may cause material performance differences between the selected model portfolio(s) and the account.

AEPS and SMArtX maintain a limited power of attorney to authorize direct trading of each account ("Trading Discretion") to purchase and sell securities in the accounts selected custodian. Trading Discretion is granted to AEPS and SMArtX through sub-advisory agreements between your Adviser and AEPS and AEPS and its sub-advisor, SMArtX. Custodians may require an additional agreement from each Advisory Firm to grant Trading Discretion to AEPS or SMArtX. You or your Adviser may choose to terminate the relationship with AEPS and revoke Trading Discretion of AEPS and SMArtX at any time.

Assets Under Management

AEPS anticipates managing \$100 million of assets under management on a discretionary basis.

Item 5: Fees and Compensation

1. TAMP Program Fee

Our investment advisory fee for the TAMP Program ("Program Fee") is based on a percentage of the assets under management in the Program, including cash and cash equivalents. Our Program Fee is typically combined with your Advisory Firm's fee and is charged to you directly by your Advisory Firm using the same method, frequency, and billable market value used by your Advisory Firm. In some cases, we will charge our Program Fee separately from your Advisory Firm's fee and will deduct the Program Fee directly from your account as directed by your Adviser. Our Program Fee includes the fees charged by our sub-advisor, SMArtX.

AEPS Fees and Primary Advisory Fees shall be charged to each Designated Account and paid monthly in arrears, based on the average daily balance of each Designated Account (including

cash and cash equivalent balances and not offset for any outstanding margin balances). The daily balance value is derived from the portfolio data provided by the Custodian of the Account. The average daily balance is calculated by adding each day's balance for the month, then dividing the sum by the number of calendar days in the month (the "billing period"). The average daily balance is then multiplied by the monthly portion of our annual Program Fee.

Our maximum annual Program Fee is 0.25% subject to a minimum annual Program Fee charged to your Advisor.

The summary above and within this Item 5 describes our standard fee practices; however, in some instances, we may adjust our fee billing arrangements based on the Advisory Firm's needs, which may be related to size, client base, growth strategy and operational needs.

You are strongly encouraged to review the Disclosure Brochure of your Advisory Firm for further information on fee billing arrangements.

2. Third-Party Manager Fees

When an Advisory Firm employs the Model Marketplace, additional fees or surcharges may be incurred from the third-party managers or sub-managers ("Third-party Manager Fees").

Your Advisory Firm is responsible for providing you with details on all applicable fees that are incurred in connection with the management of your account in the Program, and other relevant information, such as any conflicts of interest that are presented by the use of strategists, Model Providers, or their model portfolios.

Your Advisory Firm may include the Third-party Manager Fees in its total advisory fee, or the fees may be in addition to your Advisory Firm's fee. Your Advisory Firm's fee practices are disclosed in its Form ADV, Part 2A. Fees are typically deducted from your brokerage or custody account by us or your Adviser, as determined by your Adviser.

Account Termination

You may terminate your participation in the Program at any time. Fees for partial billing periods will be charged based on the number of days in the billing period that the account was under management.

We do not charge a termination fee to terminate our services; however, please note that your custodian may impose account termination fees or transfer fees if you decide to close or transfer your account. The custodian may also impose fees for administrative services, ACAT or wire transfers, or other services.

Other Fees

You should carefully review all fees charged by us, your Advisory Firm, and any investment options in your Investment Strategy to fully understand the total amount of fees that you incur in your account.

Depending on the arrangement your Advisory Firm has with the custodian who holds your account, you may also incur costs, fees, and expenses related to custody of funds and securities and the execution of securities transactions including, but not limited to, brokerage commissions, markups/markdowns, spreads, transfer fees, custodial fees, registration costs, taxes, platform fees, wiring costs, service fees, and other similar costs and transaction-related expenses incurred in your

account.

You are encouraged to review the Form ADV, Part 2A of your Advisory Firm to fully understand the fees you will incur. In addition, the underlying investment options in your Investment Strategy (e.g., mutual funds, ETFs) may have additional fees and expenses. A description of these fees is available in the prospectus of each investment option, if applicable.

Compensation from Sale of Securities

Our Firm and our employees do not receive any transaction-based compensation from the sale of securities products, including any Franklin Templeton-sponsored products.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of your assets. As such, we do not provide any side-by-side management of accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

Item 7: Types of Clients

Types of Clients

The TAMP Program is available to individuals, corporations and other business entities.

Account Requirements

Our Program is offered through unaffiliated Advisory Firms and is only available to clients of these Advisory Firms. Generally, participation in the Program requires that you have minimum household investable assets of \$50,000; however, minimums vary by model and are typically set at the account level. In addition, we reserve the right to waive this minimum based on your financial circumstances.

At the present time, our Program relies on the AdvisorEngine Portfolio Solution technology infrastructure provided by an affiliated company, AdvisorEngine Inc. (“AE”) Therefore, our Program is only available to Advisory Firms who are clients of AdvisorEngine Inc. (“AE”) and its technology services. AE receives license fees from your Adviser separate from any Program Fees paid to AEPS for the TAMP Program. AE will also receive referral fees for successfully introducing certain qualified clients to the TAMP Program.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

We provide Advisory Firms access to a variety of Investment Strategies through the TAMP platform. In this role, we have responsibility for determining the Investment Strategies available to Advisory Firms through the TAMP Platform. The TAMP platform provides Advisory Firms with the tools necessary to create and analyze portfolios holistically and implement multiple Investment Strategies in one or more accounts held with a number of qualified custodians. An Advisory Firm assesses your Investment Objectives and selects the appropriate mix of Investment Strategies for your investment portfolio based on your needs (“Investment Policy”). If you have any questions about the investment terms described in this Item 8, please do not hesitate to ask your Adviser questions.

I. TAMP Methods of Analysis

We primarily focus on analyzing Investment Strategies to enable Advisory Firms to have the material information necessary to determine whether a particular Investment Strategy or a particular group of Investment Strategies meets your Investment Objective.

AEPS selects model portfolios for inclusion in the TAMP Program through its Investment Committee investment process applying its philosophy and adhering to its policies and procedures including its due diligence process for models, Model Providers and service providers (the AEPS “Access List” or “Select List”). In certain cases, Advisers, if they choose, can request model portfolios from asset managers that have not completed the Model Manager due diligence process and are not on the Access or Select List. We may make these model portfolios available to the requesting Adviser for your account.

Franklin Templeton sponsored model portfolios included in the TAMP Program are analyzed within the investment process utilized for other unaffiliated third-party products, although an inherent conflict of interest exists when AEPS selects Franklin Templeton sponsored model portfolios and strategies. The Investment Committee members are all affiliated with Franklin Templeton as employees. To address this inherent conflict of interest, Advisory Firms recommend and select investments for your account. Advisory Firms are able to select unaffiliated model portfolios and strategies for you to invest in. AEPS then manages your assets in accordance with the Investment Strategy independently selected by your Adviser. For more information about conflicts of interest management, please refer to Item 11.

When an Advisory Firm selects a model portfolio for a particular account, they will analyze the account’s configuration, including margin availability, option permissions (if applicable), registration types, custodian and intended investment amount for the selected model portfolio before implementing a model selection. Advisory Firms are ultimately responsible for determining whether a particular model portfolio meets the Investment Objective for the account through its Investment Policy process. If the selection of a model portfolio is rejected, the Advisory Firm will need to contact us for more details.

We do not attempt to analyze the investment merits of a security or group of securities. We rely on the Model Manager to determine whether a particular security is appropriate for a particular model portfolio and on your Advisory Firm to determine whether a particular model portfolio or security is appropriate for your account.

II. TAMP Investment Strategies

The most common investment strategies utilized within the model portfolios in the TAMP Program include fundamental analysis, technical analysis and quantitative analysis for securities selection, strategic asset allocation, tactical asset allocation, and global macro analysis. This section describes those and other strategies.

Fundamental Analysis

Fundamental analysis attempts to identify the intrinsic value of a security or other investment by looking at economic and financial factors, including but not limited to the overall economy, industry environment, the financial condition of the company and the management team behind the company, to determine if the security is undervalued, indicating a buying opportunity, or overvalued, indicating a selling opportunity.

Technical Analysis

Technical analysis attempts to utilize historical price and trade data to make predictions about future price movements. Proponents of technical analysis often use charts and pattern recognition to make buy and sell decisions of securities.

Quantitative Analysis

Quantitative analysis attempts to create a mathematical model that utilizes securities data to determine if the security presents a buying opportunity or a selling opportunity. Factors can be based on the same or similar factors to fundamental analysis or on other quantifiable metrics.

Strategic Asset Allocation

Strategic asset allocation attempts to build a portfolio of securities and other investments by focusing on broader asset classes. Proponents of strategic asset allocation believe that by diversifying across asset classes investors can plan to achieve a specified risk and return profile, as measured by standard deviation and annualized returns (or similar metrics). Each asset class is given a specific ratio to the portfolio, and the portfolio is rebalanced occasionally to eliminate the impact of deviations for the target weights. Strategic asset allocation is commonly related to “Buy and Hold” strategies.

Tactical Asset Allocation

Tactical Asset Allocation attempts to generate improved risk-adjusted returns by actively changing the portfolio weights of asset classes within a portfolio. Proponents of Tactical Asset Allocation use discretionary or systematic approaches to rebalancing a portfolio.

Discretionary approaches generally look for evidence of market sentiment to choose to remain in a particular portfolio weighting or to rebalance the portfolio. Systematic approaches typically look at imbalances between asset classes compared to historical norms to determine whether to rebalance the portfolio or maintain the current weightings.

Global Macro Analysis

Global Macro Analysis attempts to take advantage of economic themes and trends at a high level. Proponents look to broadly invest in positions that will profit from changes in the industrial landscape, global political environments, or growth rates in particular economies around the world.

In addition to the above investment strategies, Model Managers utilize active trading of securities, long / short portfolio construction, and investment strategies utilizing options in the models.

Active Trading

Active trading attempts to generate short-term trading profits through price fluctuations over short periods of time. Active trading is highly speculative and requires a disciplined approach to successfully generate risk-adjusted returns over a longer time horizon.

Long / Short Portfolios

Long / Short portfolio construction attempts to allow investors to take advantage of securities that are increasing in value and securities that are decreasing in value. Selling a security short (“Short Selling”) involves borrowing the security from a third-party and selling the security in the markets. The investor Short Selling the security will have a liability to the original holder of the security and will eventually buy the security back and deliver the security back to the original holder. Short Selling is highly speculative in nature and losses from Short Selling can be unlimited. Portfolios that balance Short Selling with holding other securities in the portfolio may be able to reduce volatility. Market neutral strategies attempt to blend both long and short positions in relative weightings to reduce or theoretically remove the impact of fluctuations in the overall securities markets from the performance of the portfolio. The degree to which combining Short Selling with a long portfolio can reduce volatility or increase volatility is difficult to determine in advance.

An Advisory Firm should carefully evaluate any model portfolio using Long / Short strategies before selecting that model portfolio.

Option Strategies

A variety of option strategies exist, some of which are utilized by the models available on the TAMP platform, including buy-write strategies and premium selling strategies. Options are inherently volatile and risky securities.

An Advisory Firm should also carefully evaluate any model portfolio using option strategies before selecting that model portfolio.

III. Asset Types

We currently limit asset types in accounts to securities trading on or listed through US-domiciled exchanges. Additionally, we typically limit accounts to equities, ETFs, mutual funds, options, American depository receipts (“ADRs”), alternative investments and fixed income securities. This section provides a high level description of those asset types.

Equities

Equities, typically in the form of common stock of a C Corporation, represent ownership in an enterprise or company.

Exchange Traded Funds

ETFs are pooled investment vehicles that allow investors to buy shares of one investment to gain exposure to one or more underlying investments. ETFs trade on one or more stock exchanges, allowing investors to enter and exit positions throughout the trading day.

Mutual Funds

Mutual funds are pooled investment vehicles that allow investors to buy shares of one investment to gain exposure to one or more underlying investments. Mutual funds typically allow investors to buy or sell shares at one point during the trading day, allowing investors to enter and exit positions once a day.

Options

Options are securities that give holders of the option contracts the right to either buy a security at a particular price or sell a security at a particular price. The value of any option contract is based on the asset(s) that is bought or sold by the holder of the contract. An option contract is a derivative asset (“Derivative”) or an asset where the economic value is derived from another asset.

American Depositary Receipts (ADRs)

ADRs are securities traded on US exchanges that represent securities of non-U.S. companies. ADRs transact in U.S. dollars during U.S. market hours on U.S. exchanges to make it easier for US investors to gain exposure to foreign companies.

Fixed Income

Fixed income securities are a type of security where the issuer is borrowing money from the purchaser or holder and agreeing to pay back the loan on a fixed payment schedule. Typical fixed income securities include corporate bonds or bonds issued by companies, municipal bonds or bonds issued by local and state government and agencies, and government bonds, which includes U.S. Treasury Bills, U.S. Treasury Notes, U.S. Treasury Bonds, and government agency bonds.

IV. Risk Factors and Risk of Loss

All investments are subject to risk. Investing in securities and other instruments involves risk of loss that you should be prepared to bear.

You may incur a loss of principal – that is, the risk that the value of your securities and other instruments may be less when sold or otherwise disposed of than the price you paid for the investments. Even if the value of the investments when sold is greater than the price paid, there is a risk that the appreciation will be less than inflation.

Past performance is no indication of future performance, and we cannot guarantee that your investment objectives will be met.

The following list of risk factors (“Risk Factors”) describes some, but not all, of the risks associated with the TAMP platform including investment strategy, investment specific and general risks. Please do not hesitate to discuss any questions about risks with your Adviser.

Investment Strategy Risks

Third-Party Reliance Risk

We rely on a number of external sources for investment advice, research services, and financial and fundamental data (“Information”), including Advisers, clients, Model Managers, market data vendors, custodians, brokerage firms, and various service providers (“Data Providers”). No assurances can be given that the Information will be reliable and accurate. Inaccurate Information could adversely impact the investment advice and services provided.

Reliance on Past Results

Investing in securities involves making complex predictions about the future for specific issuers, investment managers, and the capital markets. Often, prior history provides relevant data regarding what can be expected in the future. However, no future market environment is exactly like a prior market environment. Therefore, past performance results can mislead investors about the likely future performance results. Model Managers, Advisers, and AEPS all might be unable to generate the same or similar results in the future that were achieved in the past.

Style-Drift

Model Managers and Advisers, from time to time, could determine that a deviation for a specified strategy or group of strategies may increase returns on a risk-adjusted or absolute basis for models and/or clients. In general, when any practitioner deviates from his or her core competency, there is a greater risk of failure. This is certainly the case for Model Managers and Advisers. Model Managers provide the data necessary for us to maintain the Model Portfolio and can change the behavior of the model portfolio by changing the types of securities or the investment strategies utilized by the model. In either case, style drift, or changing the nature of the investment advice provided to someone, can occur and lead to adverse consequences.

Asset Allocation and Diversification.

Asset allocation and diversification are strategies used to help mitigate risks, but they do not guarantee a profit or protect against a loss.

Active/Passive Management.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner designed to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or ETFs.

Investment Specific Risks

Equities. Investing in individual stock positions involves inherent risk, including the potential for greater concentration risk related to a single company or business enterprise. Significant risks relate to the company’s capitalization, quality of management, quality and cost of services, ability to manage costs, management of litigation risk, and ability to create shareholder value (*i.e.*,

increase the value of the company's stock price). Non-US securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk, and liquidity risk. Equity securities are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds. Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, some mutual funds may be less tax inefficient than other vehicles (such as ETFs) and therefore, investors may pay capital gains taxes on fund investments while not having yet sold the fund. *Active mutual funds may have higher fees and costs that can result in lower investment returns.* Mutual funds are not guaranteed or insured by the FDIC or any other government agency. Ask your Advisory Firm about the costs of mutual funds.

Exchange Traded Funds ("ETFs"). ETFs are investment companies with shares that are bought and sold on a securities exchange. Generally, an ETF holds a portfolio of securities designed to track a particular market segment or index. Certain ETFs may not track underlying benchmarks as expected. ETF prices may vary significantly due to market conditions and can be higher or lower than the per-share value of the ETF's net assets. An ETF may employ an investment strategy that uses high leverage ratios, resulting in higher volatility and risk of loss compared to strategies with less leverage. ETF transactions may be halted if the listing exchange's officials deem such action appropriate, if the shares are de-listed from the exchange, or in the event that a market-wide "circuit breaker" (an action tied to large decrease in stock process) halts stock trading generally. ETFs are not guaranteed or insured by the FDIC or any other government agency.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses than if the client invested directly in the underlying stocks. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund.

Fixed Income. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed income securities generally declines when interest rates rise, and the credit quality of the obligor of fixed income securities could weaken leading to a lower credit quality and value of securities.

Cryptocurrencies. Many cryptocurrencies, including Bitcoin, are currently unregulated, uninsured, carry technological risks, require unique tax treatment, and are generally much more volatile than traditional currencies.

General Risks

Market Risk. Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk. An investment strategy and/or investment technique may not work as intended.

Small and Medium Cap Company Risk. Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Credit Risk. Excessive use of credit (borrowing) to finance a business' operations increases the risk of profitability, because the company must cover its debt obligations in good and bad years.

Turnover Risk. At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets. Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions a model portfolio may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk. Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Catastrophic Events. In addition to general market risks described above, Investment Strategies may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

Non-U.S. Currency Risks. Investments in non-U.S. based assets are subject to changes in valuation due to changes in currency exchange rates.

Cybersecurity Risks. The computer systems, networks and devices used to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections, systems, networks or devices potentially can be breached. A client account could be negatively impacted as a result of a cybersecurity breach.

Interest Rate Risk. Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Liquidity Risk. Liquidity risk is the financial risk that holders of a security position might not be

able to close the position or do so without impacting the current market value of the position. Securities can be inherently less liquid than other securities and not trade in well-established markets. A particular security can experience a particular period of time where there are less market participants ready to buy or sell that security during that period. A security that holds a portfolio of other securities, such as a mutual fund, may carry liquidity risk—in this case, the risk that the fund may not be able to deliver cash upon redemption of shares of the mutual fund--based on the underlying securities held.

Legal or Legislative Risk. Legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation Risk. Inflation may erode the buying-power of your investment portfolio and account, even if the dollar value of your investments remains the same.

Reinvestment Risk. This is the risk that future gains could be reinvested at less favorable (lower) rates of return than currently available.

Item 9: Disciplinary Information

Our firm and our management persons do not have any legal or disciplinary events to disclose that would be material to your evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Our firm and our management personnel are not registered and do not have any applications pending to register, as a broker-dealer or a registered investment adviser of a broker-dealer.

Our firm and our management personnel are not registered and do not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Our firm and our management personnel do not have any relationship or arrangement with any unaffiliated broker-dealer, investment company, or other entity that is material to our advisory business or to your TAMP Program account. Importantly, AEPS is an indirect wholly owned subsidiary of Franklin Resources Inc., so all AEPS employees are affiliated with Franklin Resources Inc. and its subsidiaries.

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

CODE OF ETHICS SUMMARY

Although the services AEPS provides as an investment advisor are limited compared to its affiliate and indirect parent company Franklin Resources Inc., investment advisory offerings, AEPS has adopted the Franklin Resources Code of Ethics and Business Conduct (the "Code of Ethics"), to the extent applicable to its TAMP business including without limitation the compliance policies and operations related to code of ethics requirements under the Investment Advisors Act of 1940, as amended, and applicable regulatory requirements.

Likewise, AEPS has also adopted the Franklin Templeton Personal Investments and Insider Trading Policy (the "Personal Investments Policy"), which serves as a code of ethics pursuant to Rule 204A-1 under the Advisers Act. A brief description of the main provisions of the Personal Investments Policy follows.

The Personal Investments Policy states that the interests of AEPS clients are paramount and come before any employee. All Covered Employees (as defined below) are required to conduct themselves in a lawful, honest and ethical manner in their business practices and to maintain an environment that fosters fairness, respect and integrity.

“Covered Employees” include the AEPS’ partners, officers, directors (or other persons occupying a similar status or performing similar functions), and employees, as well as any other person who provides advice on behalf of the AEPS and are subject to the supervision and control of AEPS. The personal investment activities of Covered Employees must be conducted in a manner that avoids actual or potential conflicts of interest with the clients of AEPS. Covered Employees are required to use their positions with AEPS and any investment opportunities they learn of because of their positions in a manner consistent with their fiduciary duties to use such opportunities and information for the benefit of the Advisers’ clients and with applicable laws, rules and regulations. In addition, the Personal Investments Policy states that information concerning the security holdings and financial circumstances of clients is confidential and Covered Employees are required to safeguard this information.

Additionally, Access Persons are required to provide certain periodic reports on their personal securities transactions and holdings. “Access Persons” are those persons who have access to non-public information regarding the securities transactions of clients; are involved in making securities recommendations to clients; have access to securities recommendations that are non-public; or have access to non-public information regarding the portfolio holdings of funds for which AEPS serves as an investment adviser or a sub-advisor or any fund whose investment adviser or principal underwriter controls, is controlled by AEPS or is under common control with AEPS. Access Persons must obtain pre-clearance from the Compliance Department before buying or selling any security (other than those not requiring pre-clearance under the Personal Investments Policy). The Personal Investments Policy also requires pre-clearance before investing in a private investment or purchasing securities in a limited offering. The Personal Investments Policy generally prohibits Access Persons from investing in initial public offerings (“IPOs”); however, such investments may be permissible in certain circumstances or jurisdictions with prior approval from the Compliance Department.

To avoid actual or potential conflicts of interest with AEPS’ clients, certain transactions and practices are prohibited by the Personal Investments Policy. These include: front-running, trading parallel to a client, trading against a client, using proprietary information for personal transactions, market timing, and short selling Franklin Resources stock and the securities of Franklin Templeton closed-end funds.

The Personal Investments Policy requires prompt internal reporting of suspected and actual violations of the Personal Investments Policy. In addition, violations of the Personal Investments Policy are referred to the Chief Compliance Officer as well as the relevant management personnel.

AEPS maintains a “restricted list” and/or “watch list” of securities in which AEPS personnel generally may not trade or trades must be reviewed. The lists are updated as necessary and are intended to prevent the misuse of material, non-public information by their employees. In addition to continuous monitoring, the Compliance Department will conduct forensic testing or auditing of reported personal securities as necessary.

No Covered Employee or Access Person may trade while in possession of material, non-public information (“MNPI”) or communicate MNPI to others.

Information is considered material if there is a substantial likelihood that a reasonable investor would consider the information to be important in making his or her investment decision, or if it is reasonably certain to have a substantial effect on the price of the company’s securities. Information is non-public until it has been effectively communicated to the marketplace. If the information has been obtained from someone who is betraying an obligation not to share the information (e.g., a company insider), that information is very likely to be non-public.

Accordingly, the Firm is integrated with Franklin Templeton’s personal investing procedures designed to avoid violation of the Personal Investments Policy.

Copies of the Personal Investments Policy are available to you upon request by emailing GCSS at GlobalClientServiceSupportAmericas@franklintempleton.com.

POTENTIAL CONFLICTS RELATING TO ADVISORY AND OTHER ACTIVITIES

AEPS affiliates engage in a broad range of activities, including investment activities for their own accounts and for the accounts of others and providing transaction-related, investment advisory, management and other services. In addition, while AEPS is not a general partner of any limited partnership, one or more of its affiliates often serve as a manager, general partner or trustee or in a similar capacity of a partnership, trust or other collective investment vehicle in which the AEPS TAMP participants may invest. In the ordinary course of AEPS conducting its activities, the interests of TAMP participants will, from time to time, conflict with the interests of AEPS, other clients and/or their respective affiliates.

Potential or actual conflicts of interest arise, from time to time, in (i) investments by AEPS or its employees for their personal accounts, (ii) TAMP investment in entities affiliated with AEPS or in which an affiliate has an interest, (iii) allocation of investment opportunities and expenses, (vi) diverse membership among investors in a TAMP Program account, and (iv) diversity of client base, among others. In addition, while AEPS is part of the Franklin Templeton organization, AEPS has its own clients. Although AEPS may focus primarily on an investment strategy different from other affiliated advisers, TAMP participants and such other affiliated advisers will, from time to time, invest in the same company or issuer, including in the same security or in different securities of such company or issuer. In such circumstances, interests of AEPS TAMP participants will, at times, therefore conflict with the interests of the clients of the other affiliated advisers. In addition, the interests of and between the affiliated advisers themselves will at times be in conflict. These and other conflicts of interest are more fully described below.

AEPS manages assets of TAMP participants in accordance with the Investment Strategy selected by Advisory Firms and its clients and applicable law and will seek to give advice to, and make investment decisions for, such TAMP participants that AEPS reasonably believes to be in their best interests. We do not engage in principal trades (where our firm buys or sells securities directly from clients) or cross-agency transactions (where our firm acts as the broker for both the client and the counter-party). AEPS has implemented trading and other policies and procedures that are reasonably designed to appropriately identify, disclose, limit and/or mitigate conflicts of interest. Additional limits and mitigants of conflicts are identified below.

Any review of a conflict of interest will take into consideration the interests of the relevant accounts, the circumstances giving rise to the conflict, applicable policies and procedures and applicable laws.

The following discussion is not a complete list of conflicts to which AEPS, you or other TAMP participants are subject. In addition, other conflicts are discussed elsewhere in this brochure.

Personal Trading

Management of personal accounts by a Model Provider, portfolio manager or other investment professionals will, from time to time, give rise to potential conflicts of interest. AEPS has adopted the Personal Investments Policy, which they believe contains provisions reasonably designed to prevent a wide range of prohibited activities by its personnel with respect to their personal trading activities, as well as additional compliance procedures as needed that are designed to address these and other types of conflicts. However, there is no guarantee that the Personal Investment Policy or such additional compliance procedures will detect and/or address all situations where an actual or potential conflict arises.

Conflicts Related to Investments in Securities of Companies in Which an Affiliate or Another Account Holds Interests

AEPS will, from time to time, recommend Investment Strategies, or instruct the purchase or sale for accounts, investments in which affiliates have a material financial interest. Such financial interests include, among other things, an actual investment by an affiliate in the fund or in third- party vehicles in which AEPS or a related person has a financial interest. AEPS or their related persons may also purchase or sell for themselves securities or other investments that one or more TAMP participants owns, previously owned, or may own in the future, subject to the Personal Investments Policy, other policies and procedures, and applicable law.

Under certain circumstances and to the extent permitted by applicable law, certain accounts will invest directly or indirectly in the securities of companies in which a related person of AEPS, for itself or its clients, has an equity, debt, or other interest. Accordingly, AEPS's management of TAMP assets will, in certain circumstances, benefit the interests of members of AEPS and/or its affiliates.

With respect to a particular account, AEPS are not obligated to recommend, buy or sell, or to refrain from recommending, buying or selling any investment that "access persons," as defined by applicable federal securities laws, may buy or sell for their own account or for the accounts of any other fund.

Conflicts Related to Use of Information

AEPS receives and generates various kinds of model portfolio provider data and other information, including those related to financial, industry, market, business operations, trends, budgets, clients, suppliers, competitors and other metrics. On occasion, this information may, in certain instances, include MNPI received or generated in connection with efforts on behalf of an account's investment (or prospective investment) to better enable AEPS to anticipate macroeconomic and other trends, and otherwise develop Investment Strategies. Information barriers and/or confidentiality or similar arrangements entered into by AEPS with companies or other sources of information will limit such ability to internally share and use such information. AEPS relies on these barriers in some instances to mitigate potential conflicts of

interest, to preserve confidential information and to prevent the inappropriate flow of MNPI and confidential information. In addition, Advisers have an incentive to pursue investments in companies based on the data and information expected to be received or generated by such companies. Subject to applicable law and confidentiality obligations, the AEPS may utilize such information to benefit certain accounts (or the affiliated advisers and/or their affiliates) in a manner that may otherwise present a conflict of interest.

Conflicts Related to Investment in Affiliated Funds and Affiliated Accounts

AEPS where appropriate and in accordance with applicable laws and regulations, will recommend Investment Strategies that purchase shares of affiliated funds, or invest assets in other portfolios managed by affiliates (“Affiliated Accounts”). In addition, a Franklin Templeton affiliate (“FAV”) may construct model portfolios without considering the universe of potential funds sponsored by third-party funds, even though there may (or may not) be third-party funds that are more appropriate for inclusion in such portfolios, including available third-party funds in the applicable asset classes that have lower fees and expenses, greater performance or other favorable terms relative to an affiliated fund.

Conflicts of interest arise when investing assets into affiliated funds or Affiliated Accounts. For example, as a shareholder in a pooled investment vehicle, an investor will generally pay a proportionate share of the vehicle’s fees and expenses. Investment in an affiliated fund or Affiliated Account could therefore result in the investor, depending on the circumstances and subject to applicable law, directly or indirectly paying advisory (or other) fees to the affiliated fund or Affiliated Account in addition to any fees it pays to AEPS for managing the account. Moreover, in certain circumstances, AEPS will receive some or all of such advisory (or other) fees from an affiliate, including on occasion via a fee sharing or referral arrangement. Your investment will also, from time to time, be subject to other fees and expenses charged to the affiliated fund or Affiliated Account by other parties. Similarly, if you invest into an Affiliated Account that is a separate account managed by another affiliated adviser would be subject to any advisory fees charged by that affiliated adviser to the separate account. If you do not want assets to be invested in affiliated funds and/or Affiliated Accounts, then please notify your Adviser to discuss modifying your Investment Objectives.

In order to avoid duplication of fees, AEPS typically excludes any assets invested in affiliated funds or Affiliated Accounts from the management fee charged by AEPS to the account, unless otherwise agreed and subject to applicable law.

In some instances, certain private funds will not pay management fees to the affiliated fund or Affiliated Account with respect to such investment, unless the TAMP participant has been provided disclosure regarding such compensation arrangements. Similarly, the separate account management fees paid by certain retirement accounts (including those subjects to the Employee Retirement Income Security Act of 1974 (“ERISA”) or Section 4975 of the Internal Revenue Code of 1986, as amended) that invest in affiliated funds or Affiliated Accounts will exclude account assets invested in such affiliated funds or Affiliated Accounts to the extent required by law when calculating the Advisers’ separate account management fees. Accordingly, the assets of such accounts invested in affiliated funds or Affiliated Accounts will pay their pro rata share of such applicable fees of the Affiliated Fund or Affiliated Account, to the extent permitted by applicable law. Alternatively, AEPS may elect to provide a credit representing the respective account’s pro rata share of fees paid with respect to any assets of a client invested in shares of any such affiliated funds or Affiliated Accounts.

Conflicts Related to Service Providers

AEPS will, in its discretion, contract with a related person, including sub-advisors, to perform services for AEPS in connection with its provision of advisory services to its clients. In these circumstances, the related person may perform such services itself, or it may engage an unaffiliated service provider that it oversees to provide the services. AEPS, in its discretion, at times recommends to its clients that they contract services with a related person or an entity with which AEPS or its affiliates or a member of their personnel has a relationship or from which AEPS or its affiliates or their personnel otherwise derives financial or other benefit. AEPS will engage a related person to provide such services when it believes such engagement is beneficial to the account, such as providing efficiencies in information sharing and higher quality of service. However, AEPS also has an incentive, even if it does not act on such incentive, to recommend the related person even if another person may be more qualified to provide the applicable services and/or can provide such services at a lesser cost. Similarly, in hindsight, circumstances could be construed that AEPS was not as incentivized to pursue remedies and enforce rights against affiliated service providers as compared to unaffiliated service providers, and the Adviser may be incentivized to agree to more favorable compensation terms with an affiliated service provider than with an unaffiliated service provider.

AEPS and its affiliates may, to the extent permitted by applicable laws, make payments, or assign the right to receive performance fees, to financial intermediaries relating to the placement of interests/shares in private funds. These payments may be in addition to or in lieu of any placement fees payable by investors in those private funds. These payments to the financial intermediary and/or its representative create an incentive for the financial intermediary to recommend the private fund over other products.

Allocation of Resources

AEPS and its affiliates manage numerous funds and accounts. The TAMP Program is not exclusive to you, and AEPS does render similar or other services to other persons and entities.

In order for AEPS to adhere to applicable fiduciary obligations as well as to address and/or alleviate conflicts of interest or regulatory issues, it may not be possible or appropriate to allocate to a particular account all of the resources that might be relevant to make particular investment decisions for such an account. These resource limitations could result in AEPS making an investment or other decisions for a particular account that are different from the decisions it would make if there were no limitations. Although AEPS personnel will devote as much time to each investment as deemed appropriate, they may have conflicts in allocating their time and services among each investment and others advised by AEPS.

Gifts, Entertainment and Intangible and Other Benefits

AEPS and its personnel receive certain gifts, entertainment and intangible and/or other benefits arising or resulting from their activities on behalf of accounts. For example, to the extent permitted by Franklin Templeton's Gift & Entertainment Policy, AEPS and its personnel and/or other affiliates will, in certain instances, receive meals, tickets to events (such as sports or the theater), or similar benefits of reasonable value and discounts on products and services provided by broker-dealers or counterparties for the accounts, service

providers to the accounts and/or companies in which their accounts are invested, as applicable. Such gifts, entertainment and other benefits and/or amounts will, whether or not de minimis or difficult to value, insure exclusively to AEPS and/or such personnel (and not the TAMP participants, investors and/or their investments).

Trading Restrictions and Other Restrictions on Investment Activity

From time to time, AEPS, AEPS affiliates or sub-advisors or Advisers will be restricted from purchasing or selling, or will otherwise restrict or limit their advice, with respect to securities or other instruments on behalf of their clients. These restrictions may be the result of regulatory or legal requirements applicable to AEPS, its affiliates, sub-advisors or their clients, and/or internal policies, including those related to such regulatory and legal requirements. These restrictions may adversely impact the investment performance of accounts.

For example, if provided with MNPI with respect to a potential portfolio company in a model as described under the heading “Conflicts Related to Use of Information” above, restrictions or limitations on initiating or recommending certain types of transactions will apply. Accordingly, should an employee come into possession of MNPI with respect to an issuer, such employee, his or her employing adviser, and any other affiliated advisers (unless separated from the employee and the employee’s adviser by an information barrier) generally will be prohibited from communicating such information to, or using such information for the benefit of, TAMP participants. This prohibition could limit the ability of TAMP participants to buy, sell or hold certain investments, thereby limiting the investment opportunities or exit strategies available in model portfolios. Similarly, no employee who is aware of MNPI that relates to any other company or entity in circumstances in which such person is deemed to be an insider or is otherwise subject to restrictions under federal securities laws may buy or sell securities of that company or otherwise take advantage of, or pass on to others, such MNPI in violation of applicable law. AEPS shall have no obligation or responsibility to disclose such information to, or use such information for the benefit of, any person (including accounts that it advises). Moreover, AEPS has implemented procedures, including information barriers in certain cases as needed, that are designed to control the flow of and prohibit the misuse of such information by AEPS, affiliates, employees and on behalf of accounts.

Item 12: Brokerage Practices

Your assets will be held in an account you establish with a qualified custodian, selected by you or your Adviser. Your custodian should send account statements directly to you on at least a quarterly basis. Trades in your account will be executed by the qualified custodian or its affiliated broker-dealer based on our trade instructions. We do not accept directed brokerage arrangements.

We have approved and integrated with, and may participate in the adviser programs of qualified custodians, including Schwab Advisor Services, Fidelity Institutional Wealth Services, TradePMR, First Clearing, Pershing Advisor Solutions, (“Qualified Custodian(s)” or “qualified custodian”). (Other Qualified Custodians may be made available in the future.) Through our participation in the adviser programs offered by the Qualified Custodians, we or our agents receive various benefits, provided without cost or at a discount, that may not be available to retail customers. There is no direct link between our participation in these programs and any investment advice that we provide. The benefits received by us through our participation in these programs do not depend on the amount of brokerage transactions directed

to these custodians. Therefore, these services are not considered soft dollar arrangements.

The benefits we, or our agents, receive through these adviser programs include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The receipt of these benefits from the Qualified Custodians creates a conflict of interest as we have a financial incentive to recommend that you maintain your account with a specific custodian.

However, this conflict is mitigated because the selection of the qualified custodian used to hold your account is solely the responsibility of you and/or your Advisory Firm. We do not make recommendations regarding which qualified custodian you should use.

Aggregate (Block) Trading

As a general policy, if we, or our agents such as SMArtX, believes it is appropriate under the circumstances, securities orders placed for the same security on the same day may be combined (or “blocked” or “aggregated”) with the objective of receiving the best overall blend of pricing and execution. The subsequent allocations among such accounts will be effectuated on a pro rata basis, based on the relative value of the accounts. Please refer to SMArtX Form ADV for more information.

Trade Errors

Investment management is complex. On occasion, we, or our agents, may make an error in executing securities transactions or in complying with a client's guidelines – for example, by buying a position were intended to sell it, or by purchasing an ineligible security for an account. Where you suffer a loss and AEPS believes the error is one for which we should make the client whole, we generally correct the error by placing the account, to the extent practical, in the same position (net of any associated gains) as it would have been if there had been no error. Depending on the circumstances, and subject to applicable law and legal agreements, we may take various steps, including cancelling the trade, correcting an allocation, or buying or selling a position, to achieve this result. We do not maintain an “error account” on our own books, so any relevant corrective trading is done in your or your Advisor’s account. However, some qualified custodians employ a trade error account, and any trade errors under a certain amount (gain or loss) will be maintained by such custodians to minimize and offset administrative time and expense necessary to correct trade errors. The form and timing of error notification may differ based on the particular account and the facts and circumstances.

While most errors are straightforward, and we intend to reimburse accounts for most trade and guideline errors (to the extent they result in a loss) when they do arise, not all mistakes require compensation by AEPS. In some cases, a third party such as the broker on the trade or sub-advisor may take responsibility for a particular error. In addition, in some cases, an element of subjective judgment is required to determine whether an error has taken place, whether it requires

compensation, and how to calculate the loss involved. With the assistance of the Compliance Department and other relevant professionals, we carefully review errors to determine whether we have breached our standard of care and, if so, what compensation may be due. In cases where a correction of an error results in a net gain, the client retains that gain.

You should also be aware that the need to review an Investment Objective or relevant portfolio restriction (including an applicable law) carefully may in some cases create a potential opportunity cost. AEPS, its sub-advisor and its affiliates sometimes choose, as a prudential matter, to limit certain accounts from trading in a particular instrument while reviewing and interpreting relevant law or contractual limitations or, where necessary, notifying you or your Advisor and, in certain cases, obtaining express consent, and this delay could cause some accounts to miss investment opportunities. In certain situations where we are unable to confirm with confidence that a particular account is permitted to invest in a particular opportunity, or where notification or consent is needed, but cannot practically be arranged in a timely manner, we may be unable to proceed with the investment for that account, even if other TAMP participants do participate. Because any such delay or missed investment opportunity arises from the need to ensure guideline compliance, we do not regard these situations as errors.

Item 13: Review of Accounts

The Firm will review accounts in the Program on at least a quarterly basis. Each account is reviewed for alignment with the Investment Strategy mandate as selected by your Advisor. We will work with your Advisor to help ensure your Advisor addresses any unintended variances from the selected Investment Strategy.

Your qualified custodian should provide you with trade confirmations for each transaction, account statements on at least a quarterly basis, and tax reporting statements. We encourage you to review these documents carefully, and alert your Adviser if you have any questions or concerns.

We do not deliver regular reports or statements to you; however, your Adviser may access reporting features available on our Program platform and deliver reports to you.

Item 14: Client Referrals and Other Compensation

Please see the information provided in Brokerage Practices above regarding benefits we receive as a result of our participation in the adviser programs offered by the Qualified Custodians.

Professionals employed by our affiliated company AdvisorEngine Inc. may refer qualified Advisory Firms to us. If a referred Advisory Firm engages our services, the referring professional will receive a referral fee if criteria are satisfied.

Because our Program relies on the AdvisorEngine Inc. technology, our affiliated company AdvisorEngine Inc. may, in some cases, in its sole discretion, offer AdvisorEngine license fee discounts or waivers to Advisory Firms who engage our services. The decision to issue a discount or waiver may depend on such factors as the number of accounts or total assets in our Program.

We do not receive any other economic benefit from any unaffiliated party, who is not a client, for providing investment advisory services to you.

Item 15: Custody

Our Program Fee is typically combined with your Advisory Firm's fee and is charged to you directly by your Advisory Firm using the same method, frequency, and billable market value as

used by your Advisory Firm. In some cases, we will charge our Program Fee directly to you and we will be authorized to deduct our Program Fee directly from your account. Our ability to deduct our Program Fee directly from your account is deemed to be a form of custody. We do not have physical custody of your funds or securities and your accounts are held with a Qualified Custodian. You should receive account statements on at least a quarterly basis from your Qualified Custodian. Please carefully review these account statements to confirm fee billing practices and your holdings.

Item 16: Investment Discretion

We do not have the discretion to choose an Investment Strategy for you. Your Adviser is responsible for determining which Investment Strategy is appropriate for you based on your financial situation.

Once an Investment Strategy is selected for you, we and our sub-advisor, such as SMArtX or other third party managers within the TAMP Program, manage your assets in the Investment Strategy on a discretionary basis. This means that we have the discretion to make investment decisions with regard to your account, and to implement transactions to carry out those decisions without seeking or obtaining the prior permission of you, your Adviser, or your Advisory Firm.

You grant us discretionary authority to manage your account in the Advisory Agreement between you, your Advisory Firm, and us.

Item 17: Voting Client Securities

We will not exercise proxy voting authority. The obligation to vote proxies shall at all times rest with you or your Adviser. Your qualified custodian should send all proxy information directly to you or your Adviser. You should contact your Adviser or Advisory Firm if you have any questions about voting proxies.

Item 18: Financial Information

We do not have any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients.

We have not been the subject of a bankruptcy petition at any time during the past ten years.

Brochure Supplement for Edward H “Ned” Dane

CRD No. 2261769

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888-225-7216

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(Form ADV Part 2B)

August 19, 2025

Item 1: Cover Page

This Brochure Supplement is attached to the Disclosure Brochure of AdvisorEngine Portfolio Solutions, Inc. and provides information about Edward H “Ned” Dane, CAIA, Chief Investment Officer (“CIO”). Please contact us at info@advisorengineps.com if you have any questions about the contents of this Brochure Supplement, or to request a current copy of our Disclosure Brochure.

Additional information about Edward Dane is available on the SEC’s website at adviserinfo.sec.gov by conducting an individual search using his CRD No. 2261769.

Item 2: Educational Background and Business Experience

Born 01/27/1966

Educational Background

University of New Hampshire, Durham, NH, BA English, 1988

Business Experience

Chief Investment Officer, AdvisorEngine Portfolio Solutions Inc. August 2025-present

Chief Growth Officer, AdvisorEngine Inc. June 2023-present

Aidentified, LLC, Chief Strategy Officer Sept 2019-June 2023

Oppenheimer Funds Distributor Inc., SVP Head of Private Client Group, Aug 2014-June 2019

Merrill Lynch, Pierce, Fenner & Smith Incorporated, Managing Director Nov 2007-May 2014

AXA Advisors, LLC President, Aug 2002-Oct 2007

MONY Securities Corporation, President, Jul 2004-Mar 2006

Putnam Retail Management Limited Partnership, Senior Vice President Feb 1992-Jul 2002

Fidelity Management and Research, Service representative, Jan 1992-Feb 1992

Professional Designations, Licensing and Exams

Chartered Alternative Investments Analyst (CAIA)

Item 3: Disciplinary Information

Edward H Dane has not been the subject of any legal or disciplinary actions.

Item 4: Other Business Activities

In addition to acting as the Chief Investment Officer, Edward Dane is currently the Chief Growth Officer of AdvisorEngine Inc and also serves on three philanthropic boards: The Frick Art and Historical Center, Pittsburgh PA, The Helen C. Frick Foundation, Pittsburgh PA and The University of New Hampshire Sustainability Institute Advisory Board, Durham, NH.

Item 5: Additional Compensation

Other than as disclosed in Other Business Activities above, Edward Dane does not receive economic benefit from any third party for providing investment advisory services on behalf of AdvisorEngine Portfolio Solutions to its clients.

Item 6: Supervision

Edward Dane is subject to written policies and procedures, including the Compliance Manual and Code of Ethics. Richard Cancro, CEO and Head of TAMP, is responsible for oversight and supervision of Edward Dane. He may be reached at 888-225-7216.

Privacy Policy

This Privacy Policy explains how AdvisorEngine Inc. (“*AdvisorEngine*”) and its affiliate AdvisorEngine Portfolio Solutions Inc., (“*AdvisorEngine*,” “*we*,” “*our*,” or “*us*”) collects, uses, and discloses information about you. This Privacy Policy applies when you use our websites, AdvisorEngine.com, AdvisorEngine-Portfolio-Solutions.com, wealth management technology platform and other products and services including the turnkey asset management platform (“TAMP”) services (collectively, our “*Platform*”), contact our customer service team, engage with us on social media, or otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy and, when material, we will provide you with additional notice (such as adding a statement to our website or sending you a notification) and consent as required under applicable law. Your continued use of this Platform after we make changes is deemed to be acceptance of those changes when permissible. We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

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COLLECTION OF INFORMATION

Information You Provide to Us

To use the Platform, you must sign a licensing agreement and/or create an account(s). In doing so, we collect information you provide directly to us. For example, you share information directly with us when you create an account, fill out a form, submit or post content through our Platform, make a purchase, communicate with us via third-party platforms, request customer support, or otherwise communicate with us. The types of personal information we may collect include your name, email address, postal address, phone number including cell phone number, professional or employment-related information such as company name or representatives’ names, and any other information you choose to provide.

Personal Information About Minors

The AdvisorEngine Platform and services are neither intended for, nor targeted to children under 18, and we do not collect personal information directly from children under 18. We receive limited

personal information about children from parents/guardians and other responsible adults only as required to establish and maintain accounts for the child's benefit. Additionally, we do not sell the personal information of minors, nor do we direct targeted advertising to minors.

Information We Collect Automatically When You Interact with Us

When you access or use our Platform or otherwise transact business with us, we automatically collect certain information, including:

- **Activity Information:** We collect information about your activity on our Platform, such as data displayed.
- **Transactional Information:** When you make a purchase, we collect information about the transaction, such as product details, purchase price, and the date and location of the transaction.
- **Device and Usage Information:** We collect information about how you access our Platform, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, browser type, and app version. We also collect information about your activity on our Platform, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Platform.
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use tracking technologies, such as cookies and web beacons, to collect information about you. Cookies are small data files stored on your hard drive or in device memory that help us improve our Platform and your experience, see which areas and features of our Platform are popular, and count visits. Web beacons (also known as "pixel tags" or "clear GIFs") are electronic images that we use on our Platform and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see our [Cookie Policy](#) and the [Your Choices](#) section below.

Information We Collect from Other Sources

We obtain information from third-party sources in order to provide business services. We do not sell the information we collect except as described herein. For example, we may collect information about you from identity verification, credit bureaus, advertising networks, data analytics providers, custodians, vendors you identify, and/or mailing list providers. This information is required for the use of our services. Additionally, if you create or log into your AdvisorEngine account through a third-party platform (such as Facebook or Google), we will have access to certain information from that platform, such as your name, birthday, and profile picture, in accordance with the authorization procedures determined by such platform, however we do not collect this information and do not sell this information.

Information We Derive

We may derive information or draw inferences about you based on the information we collect. Please see below. For example, we may make inferences about your location based on your IP.

USE OF INFORMATION

We use the information we collect to provide, maintain, administer and/or improve the Platform. We also use the information we collect to:

- Ensure proper functioning of AdvisorEngine and the Platform;
- Provide services, content, material and other information on the Platform;
- Process transactions and send you related information, including confirmations, receipts, invoices, customer experience surveys, and recall notices;
- Personalize and improve your experience on our Platform;
- Identify and/or diagnose problems on or related to our Platform;
- Send you technical notices, security alerts, and support and administrative messages;
- Provide requested information, technical support and/or integrations such as an application programming interface or API;
- Respond to your comments and questions and provide customer service;
- Communicate with you about products, Platform, and events offered by AdvisorEngine and others and provide news and information that we think will interest you (see the [Your Choices](#) section below for information about how to opt out of these communications at any time);
- Monitor and analyze trends, usage, and activities in connection with our Platform;
- Personalize the advertisements you see on third-party platforms and websites (for more information, see the [Advertising and Analytics](#) section below);
- Personalize the advertisements you see when you use our Platform based on information provided by our advertising partners;
- Target prospective customers with our products or services (with your consent, where legally required);
- Detect, investigate, and prevent security, privacy and cyber incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of AdvisorEngine and others;
- Debug to identify and repair errors in our Platform;
- Comply with our legal and financial obligations;
- Carry out any other purpose described to you at the time the information was collected; and
- For other reasonable internal use or uses aligned with your relationship with us and the context in which we collected the information.

Confidentiality and Security

Our employees are required to follow procedures with respect to maintaining the confidentiality of our investors' non-public personal information. Additionally, we maintain physical, electronic and procedural safeguards to protect the information. This includes performing ongoing evaluations of our systems containing investor information and making changes when appropriate.

SHARING OF INFORMATION

We share personal information in the following circumstances or as otherwise described in this policy:

- We share personal information with vendors, service providers, and consultants that need access to personal information in order to perform services for us or you, including without limitation trade processing, Platform integration partners, data management, fraud prevention, customer service, AdvisorEngine merchandise, marketing and/or advertising.
- All authorized users listed on your account may view personal information stored in your account. A primary account holder may view personal information saved in sub-accounts to which it has authorized access.
- If you choose to use integrations we offer on our Platform, we share certain information with the integration partners.
- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- We may share personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of AdvisorEngine and its corporate affiliates, our users, the public, or others.
- We share personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may share personal information in connection with, or during negotiations concerning, merger, sale of company assets, financing, bankruptcy, business closure, or acquisition of all or a portion of our business by another company. Additionally, as part of such an event, we may transfer or sell personal information to a third party. We will provide notice to you by email and/or a prominent notice on our Platform of any such sharing to a third party and any choices you may have regarding the sharing of your personal information.
- Personal information is shared between and among AdvisorEngine and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership (“corporate affiliates”). This information may be used to provide you with offers, services, or products that may be of interest to you and provide you with their products and services. Any such corporate affiliate may use your personal information only according to the terms of this Policy. If you are located in a jurisdiction where such sharing requires your permission, we will share such information with your consent. If you decide you no longer wish to receive these promotional communications, please follow the instructions provided in [Your Choices](#) section below.
- We share personal information with your consent or at your direction.
- We also share aggregated or de-identified information that cannot reasonably be used to identify you.

ADVERTISING AND ANALYTICS

AdvisorEngine may allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile apps. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Platform and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, and conversion information. This information may be used by AdvisorEngine and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Platform and other websites, and better understand your online activity.

For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, consider visiting www.aboutads.info/choices (if you are in the US) or <http://www.youonlinechoices.eu/> (if you are in the EU), or change your settings using the consent management tool on our Platform. Your device may also include a feature (“Limit Ad Tracking” on iOS or “Opt Out of Interest-Based Ads” or “Opt Out of Ads Personalization” on Android) that allows you to opt out of having certain information collected through mobile apps used for behavioral advertising purposes.

We may also work with third parties to serve ads to you as part of customized campaigns on third-party platforms (such as Google, LinkedIn and Facebook). As part of these ad campaigns, we or the third-party platforms may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn about your interests and serve you advertising that is customized to your interests.

Note that the third-party platforms may offer you choices about whether you see these types of customized ads. You may opt out of receiving targeted marketing communications from AdvisorEngine at any time by emailing us at support@advisorengine.com, calling us at 1-866-826-2731 or unsubscribing from promotional communications [here](#).

TRANSFER OF INFORMATION TO THE UNITED STATES AND OTHER COUNTRIES

AdvisorEngine is headquartered in the United States, and we have operations and service providers in the United States and other countries. Therefore, we and our service providers may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it.

YOUR CHOICES AND CONTROLS

Account Information

You may update or correct certain account information or deactivate your account at any time by logging into your account, emailing us at support@advisorengine.com, or calling us at 1-866-826-2731. If you wish to deactivate your account, please note that we may retain certain information as required by law or for our legitimate business purposes. If you decide you no longer wish to receive AdvisorEngine promotional communications, please [click here](#).

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Platform. For more information about cookies and how to disable them, see our [Cookie Policy](#).

Communications Preferences

You may opt out of receiving promotional emails from AdvisorEngine by following the instructions in those communications or by calling 1-866-826-2731. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

Applicable US Privacy Laws

The state you reside in may provide you with certain choices or privacy rights over your personal information as described below. Although these rights do not apply to those covered under applicable Federal privacy law or expressly exempt from your state's law, other state residents may be covered.

- Right to know – Requires that we inform you about the personal information and sensitive personal information we collect.
- Right to access – Allows you to request a copy of the personal information we have on file for you and to be informed about how we use and share your personal information.
- Right to delete – Allows you to request that we delete or anonymize your personal information where we do not have a legal or regulatory obligation or other valid reason to continue to retain it.
- Right to rectification – Allows you to request that Franklin Templeton correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of your personal information.
- Right to object/opt-out – Allows you to request to opt out of the processing of your personal information for the purposes of:
 - the sale or sharing of personal information as defined by the state law applicable to your state residency;
 - profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning you; and
 - targeted advertising.
- Right to appeal – Allows you to request that Franklin Templeton review a decision to not fulfill a privacy rights request.
- Right to equal treatment – You have the right not to be discriminated against for exercising a privacy right.

To exercise a privacy right under applicable state law, use one of the methods listed below. To protect the security and privacy of your personal information, we may need to verify your identity, and the identity of your authorized agent if the request is submitted by someone other than you, against the information we have on file for you before we can fulfill your request. This is to ensure that your personal information is not disclosed to any person who does not have authority to receive it. We may also request further information in relation to your request to help us locate your personal information, including, for example, the nature of your relationship with us.

- Complete the [U.S. Privacy Rights Request Form](#) and email or mail it to the address noted in the form.
- Call 1-800-632-2301 to speak to a service associate and request to exercise your privacy rights.
- You may use one of the following methods to opt out of targeted advertising:
 - Visit the Cookie Preference Center and disable tracking cookies.
 - Enable the [Global Privacy Control \(GPC\)](#) in your browser. When enabled in your web browser, the GPC automatically opts you out of tracking and social media cookies upon visiting our website. (Our website does not respond to “Do Not Track” signals. If you wish to use this option, please consider using the Global Privacy Control.)
 - Visit [Do Not Sell or Share My Personal Information](#) to opt out of the selling or sharing of your personal information.

YOUR CALIFORNIA PRIVACY RIGHTS

California law, including the California Consumer Privacy Act or “CCPA” (Cal. Civ. Code § 1798.100 *et seq.*) and the Shine the Light law (Cal. Civ. Code § 1798.83), afford consumers residing in California certain rights with respect to their personal information. If you are a California resident, this section applies to you.

California Consumer Privacy Act

In the preceding 12 months, we have collected the following categories of personal information: identifiers, commercial information, internet or other electronic network activity information, professional or employment-related information, and inferences. For details about the data points we collect and the categories of sources of such collection, please see the [Collection of Information](#) section above. We collect personal information for the business and commercial purposes described in the [Use of Information](#) section above. In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<i>Category of Personal Information & Recipients</i>	<i>Type of Information & Categories of Recipients</i>
Identifiers: Service Providers and third-party vendors	Information, government IDs, cookies, name, alias, postal address, unique personal identifier, online identifier, Internet Protocol

	(IP) address, email address, cell phone number, account name, social security number, driver's license number, passport number, or other similar identifiers
Commercial information: Service Providers and third-party vendors	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other electronic network activity information: Service Providers and third-party vendors	Browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement
Professional or employment-related information: Service Providers and third-party vendors	Name, address, government ID, social security number or another similar identifier
Inferences: Service Providers and third-party vendors	Used to create a profile reflecting a consumer such as: preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, aptitudes

ADDITIONAL DISCLOSURES FOR INDIVIDUALS IN EUROPE

If you are located in the European Economic Area (EEA), the United Kingdom, or Switzerland, you have certain rights and protections under the law regarding the processing of your personal data, and this section applies to you.

Legal Basis for Processing

When AdvisorEngine processes your personal data, AdvisorEngine will do so in reliance on the following lawful bases:

- To perform our responsibilities under our contract with you (e.g., processing payments for and providing the products and Platform you requested).
- When we have a legitimate interest in processing your personal data to operate our business or protect our interests (e.g., to provide, maintain, and improve our products and Platform, conduct data analytics, and communicate with you).
- To comply with our legal obligations (e.g., to maintain a record of your consents and track those who have opted out of marketing communications).
- When we have your consent to do so (e.g., when you opt in to receive marketing communications from us). When consent is the legal basis for our processing of your personal data, you may withdraw such consent at any time.

Data Retention

We store personal data associated with your account for as long as your account remains active. If you close your account, we will deactivate your account data within 30 days. We will delete or remove personal data as required under applicable laws and in response to your written request. We store other personal data for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Data Subject Requests

Subject to certain limitations, you have the right to request access to the personal data we hold about you and to receive your data in a portable format, the right to ask that your personal data be corrected or erased, and the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, please email us at support@advisorengine.com.

Questions or Complaints

If you have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside. Contact details for your Data Protection Authority can be found using the links below:

For individuals in the EEA: https://edpb.europa.eu/about-edpb/board/members_en

For individuals in the UK: <https://ico.org.uk/global/contact-us/>

For individuals in Switzerland: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

CONTACT US

If you have any questions about this Privacy Policy, please contact us at:

Email: support@advisorengine.com

Toll-free telephone: 1-866-826-2731

Postal address: AdvisorEngine, 1616 E. Millbrook Road, Suite 210, Raleigh, NC 27609