

Introduction

Sidepocket Inc (“Sidepocket”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. The SEC offers free and simple tools to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.

Relationships and Services

What investment services and advice can you provide me?

Sidepocket is a mobile-based investment advice application. Portfolio allocations are generated by a proprietary algorithm based upon information provided by the Client regarding net worth, income, investment objective, and risk tolerance. Sidepocket is a robo-adviser which means investment advice is provided solely through the Sidepocket application.

We offer retail investors investment advisory services. Sidepocket’s technology utilizes client input about risk tolerance, investment objective, liquidity needs, net worth, and other data to generate investment portfolios. Rather than simply combining stocks, bonds, and other assets in a single portfolio, Sidepocket creates client portfolios that combine quantitative (automated) strategies that apply tactical asset allocation and are catered to your unique investor needs.

Sidepocket does not require a minimum balance to become a subscriber of our mobile application and its features. However, in most cases, there is a \$250 minimum balance required to open an account through our custodian. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships.

For additional information, including minimum investment amounts, please see our Wrap Brochure Items 4.A. & 5 available at:

<https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

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

Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

Sidepocket charges \$3.29 per month for Sidepocket LITE. For account balances over \$5,000 in net deposits, clients are upgraded to Sidepocket All-Access. Clients pay the greater of the monthly subscription or an investment management fee of 0.79%. If your account balance falls below \$5,000, the subscription fee of \$3.29 is charged for that month. Our fees are not negotiable. Monthly subscription charges are paid in advance; investment management fees are charged in arrears as specified in our agreement. Sidepocket does not accept performance-based fees or participate in side-by-side management.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. The only compensation received from advisory services is the fees charged for providing investment advisory services as described above. Sidepocket receives no other forms of compensation in connection with providing investment advice.

For additional information about our fees and costs, please see our Wrap Brochure (specifically Item 4 of Appendix 1) available at <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

Ask your financial professional: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. As mentioned above, the more assets that Clients have in their accounts, the more we receive in fees. We therefore have an incentive to encourage clients to increase the assets in their account. Also, although we do not receive compensation because of your participation in the Wrap Program, your total costs may be more than if you pay separately for investment advice, brokerage, and other services. This gives us a financial incentive to recommend the Program. Not all investment advisers offer their services via a wrap-fee.

Through our Sidepocket Premier feature available on the Sidepocket App, Clients have access to third-party services. We are compensated if a Client engages with one of these third-party services. Your relationship with one of these third parties is separate and distinct from your relationship with Sidepocket. Additionally, we have entered into marketing agreements with one or more third parties to provide compensation for referrals. In all cases, you do not pay any more or less in subscription or investment management fees as a consequence of these arrangements.

Ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

For additional information, please see Item 4 in our Wrap Brochure available at <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

How do your financial professionals make money?

The firm is compensated by clients with subscription fees and investment management fees. Sidepocket's financial professionals are not compensated based on factors such as amount of client assets they service; time and complexity required to meet a client's needs; product sold (i.e., differential compensation); product sales commissions; or revenue the Sidepocket earns from financial professional's advisory services.

Disciplinary History

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

No, we do not have any legal or disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Ask your financial professional: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can find additional information about our services and request a copy of this relationship summary by visiting <http://www.sidepocket.com>; emailing support@sidepocket.com or calling 800-490-2188.

Ask your financial professional: Who is my primary contact person? Is he or she a representative of an advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?