

Ally Invest Advisors Client Relationship Summary



Ally Invest Advisors Inc. (AIA or we) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors under several varieties: Invest Simply, Robo Portfolios, Personal Advice, and Guided Advice. Our services require you to grant us discretionary authority, which allows us to direct trading in your account without having to obtain your approval before each trade. AIA will exercise that authority to purchase and sell securities in accordance with your chosen portfolio. We monitor your investments daily as part of our standard services and initiate trades to rebalance your portfolio as needed. Your grant of authority does not permit us to withdraw funds or securities from your account, with the sole exception of withdrawing funds to collect our advisory fees.

Automated Investing

Robo Portfolios and Invest Simply (collectively known as Automated Investing) are offered exclusively through our web-based and mobile application platforms. Clients respond to a sequence of interactive questions that provide us with information upon which we base a portfolio recommendation. Portfolios are comprised of a variety of exchange-traded funds (ETFs). Invest Simply offers portfolios generally comprised of four ETFs. The minimum initial investment for an Invest Simply account is \$10. Robo Portfolios offer a larger variety of portfolio choices with more ETFs compared to the Invest Simply service. Robo Portfolio clients select between a Cash-Enhanced version, where approximately 30% of the account is made up of cash or cash alternatives, and the more fully invested Market-Focused version, where the cash or cash alternative portion makes up approximately 2% of the account. The minimum initial investment for a Robo Portfolio account is \$100.

Personal Advice and Guided Advice

The Personal Advice and Guided Advice services offer a relationship with a Financial Advisor. The Financial Advisor may utilize a variety of ETFs to discretionarily manage your account. The Guided Advice service is designed for a single investment goal and is an advisory service offered to a select population of Clients. The minimum initial investment for the Guided Advice service is \$25,000. The Personal Advice service offers more in-depth and holistic financial planning through the dedicated Financial Advisor, who assesses and develops a plan to address the client's overall financial needs and goals. The Personal Advice service offers a larger variety of portfolio choices compared to the Guided Advice service. The minimum initial investment for the Personal Advice service is \$100,000, which can be aggregated across multiple accounts and household members, with a \$1,000 per account minimum. The Personal Advice financial plan may also cover your assets at other institutions, but we will not manage or charge a fee for such assets.

If you are a Personal Advice or Guided Advice client, we encourage you to ask the following questions of your Financial Advisor:

- 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?

Invest Simply and Robo Portfolio clients can find answers to these questions at www.ally.com/resources/pdf/invest/aia-conversation-starters.pdf.

For additional information, please see the AIA Firm Brochure: www.ally.com/resources/pdf/invest/wrap-fee-pgrm-brochure.pdf.

What fees will I pay?

Invest Simply and Cash-Enhanced Robo Portfolios carry no advisory fees. For the other services, you will pay an advisory fee based on the value of the assets managed by AIA. Fees are generally billed monthly in arrears according to the following tables:

Single Rate Services		Personal Advice	
Service	Annualized Fee Rate	Assets Under Management	Annualized Fee Rate
Market-Focused Robo Portfolios	0.30%	First \$250,000	0.85%
Guided Advice	0.50%	Next \$250,000, up to \$1,000,000	0.80%
		Additional assets above \$1,000,000	0.75%

In addition to the advisory fee, you may also incur certain service fees, such as trading activity fees, individual retirement account fees or account termination fees, by our affiliated broker-dealer, Ally Invest Securities LLC, and its clearing and carrying firm, Apex Clearing Corporation. Such fees are charged in connection with their servicing of your account and are not shared with AIA. A current list of these fees can be found at www.ally.com/invest/commissions-and-fees/.

The total costs may be more or less than separately purchasing brokerage and advisory services. Fees may be waived or reduced by discounts and other promotions at our discretion.

The more assets there are in your advisory account, the more you will pay in fees. We therefore have an incentive to encourage you to increase the assets in your account. Our advisory fee does not include underlying expenses of the ETFs in which you invest (ETF Expenses), which are paid by all investors in an ETF. ETF Expenses include underlying fund advisory fees and other fund service fees.

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.

If you are a Personal Advice or Guided Advice client, we encourage you to ask the following questions of your Financial Advisor:

- **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?**

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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:

- Ally Invest Securities is compensated when it places orders on behalf of AIA that are executed by various market centers. Specifically, it receives a per-share rebate—or “payment for order flow”—at the time an order is executed. Ally Invest Securities does not share such compensation with AIA.
- Apex earns interest on cash balances in your account by holding them in omnibus, or unsegregated, accounts at multiple banks, including AIA’s affiliate, Ally Bank. Apex pays a portion of that interest to Ally Invest Securities, which then pays a portion to you. We do not keep any portion of the interest paid on your cash.

If you are a Personal Advice or Guided Advice client, we encourage you to ask the following questions of your Financial Advisor:

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

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How do your financial professionals make money?

Persons associated with AIA are compensated primarily by a base salary. They are eligible to receive additional cash incentive compensation that is a percentage of their base salary. The incentive portion of our financial professionals’ compensation is based on individual performance, client satisfaction metrics, business unit performance, and performance of the firm.

The Personal Advice and Guided Advice advisory services are provided via a relationship with a Financial Advisor. The Financial Advisor’s compensation is comprised of base pay and incentive payments. The base pay is a majority of the Financial Advisor’s total compensation. Incentive payments are tied to several factors, including success at attracting new assets, client satisfaction, and other key behaviors.

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

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

If you are a Personal Advice or Guided Advice client, we encourage you to ask the following questions of your Financial Advisor:

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Additional information.

For additional information about our services, please see: www.ally.com/invest/managed-portfolios/ or www.ally.com/invest/personal-advice. If you would like additional, up-to-date information or a copy of this disclosure, please call 855-880-2559.

If you are a Personal Advice or Guided Advice client, we encourage you to ask the following questions of your Financial Advisor:

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

Invest Simply and Robo Portfolio clients can find answers to these questions at www.ally.com/resources/pdf/invest/aia-conversation-starters.pdf.