



# LEGAL DISCLOSURES

Form ADV Part 2A & 2B  
Privacy Policy

**This disclosure provides information about the qualifications and business practices of Glide Path Advisors LLC. If you have any questions about the contents of this brochure, please contact us at: (248) 277-3470, or by email at [info@glidepathadvisors.com](mailto:info@glidepathadvisors.com).**

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. Additional information about Glide Path Advisors is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

Please note that the use of the term Registered Investment Advisor does not imply that an advisor has met any certain level of skill or training.

February 22, 2022

**Glide Path Advisors LLC**

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# MATERIAL CHANGES

## Material Changes since the Last Annual Update

Below are the material changes to this document since our last annual update:

1. Updated Page 4 to reflect the latest assets under management of \$19,680,013.
2. Updated Page 4 to reflect our new ownership by Washington Avenue Advisors LLC.
3. Updated in various locations to reflect the sale of The Svoboda Group, LLC and Kenneth Svoboda's new role as a consultant with the acquiring firm, Blumark Tax Advisors.
4. Updated in various locations to reflect that Brian D'Aprile is no longer an investment advisor representative with the firm. He remains with the firm in a consulting capacity only.

## Date of Last Annual Update

February 26, 2021

## Latest Brochure Available

If you would like to receive a copy of our latest Firm Brochure, please contact us by telephone at: (248) 277-3470, email us at [info@glidepathadvisors.com](mailto:info@glidepathadvisors.com), or download it from our website at [www.glidepathadvisors.com](http://www.glidepathadvisors.com).

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# ADVISORY BUSINESS

## Firm Description

We were founded in 2008 as a Limited Liability Company (LLC). We offer personalized financial planning, investment management, and insurance services to individuals, trusts, estates, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, debt management, and other goal funding.

## Our Services

### ConciergeAdvice<sup>SM</sup>

Our comprehensive services are offered in a single convenient package referred to as **ConciergeAdvice<sup>SM</sup>**. This unique service bundles the conventional financial advisory services of financial planning, investment management, and insurance services into an all-inclusive affordable package. The actual services for each client are dependent on the individual client circumstances and needs.

These services may include cash flow planning, education/college planning, retirement planning, insurance/risk analysis planning, specific savings goal planning, investment account analysis, estate planning, and discretionary investment management for accounts held with our third-party custodian.

### Financial Planning

We offer clients written financial plans tailored to their individual needs. We meet with clients to gather all relevant client information and prepare financial plans that generally fall into the following categories:

- cash flow planning
- education/college planning
- retirement planning
- insurance/risk analysis planning
- specific savings goal planning
- investment account analysis
- estate planning

In addition, we are available to our clients for other specific financial planning needs.

## Investment Management

We provide investment management services through our discretionary asset management program for our clients' investment accounts held with our third-party custodian. Our investment management services include the following steps:

1. A Discovery Meeting is conducted to learn about the client's current investment situation, investment goals, tolerance for risk, and any other factors relevant to client and their investments.
2. We will take the information from the Discovery Meeting and prepare a customized Investment Policy Statement (IPS) for the client. This IPS summarizes their unique situation and the detailed plan for how to handle the investments in their account(s). The IPS will include a recommended portfolio mix among many different asset classes to match the expected risks and returns of the client's investments to their financial goals and situation.
3. We will review this IPS with the client, make any necessary changes, and jointly sign the IPS with them to confirm that we all understand how the investment plan will be implemented.
4. We then handle the initial and on-going investment needs in the investment account(s). These include making the initial investment purchases, monitoring the investment holdings, monitoring the markets, making any on-going investment changes, and ensuring the investments implemented continue to match the plan as agreed to in the IPS. We will decide what securities to buy and sell, when to buy and sell them, and place the actual trades for the account(s) in line with the parameters set forth in the IPS. The client will not have to make these decisions or place any trades themselves.

## Types of Investments

Our advice is limited to the types of investments that we believe we understand best and where we can leverage our investment knowledge to deliver the best designed portfolios. Therefore, we recommend investments from the following types of securities only:

- individual stocks
- exchanged traded funds
- closed end funds (occasionally)
- mutual funds (occasionally)

We do not recommend or invest in the following types of securities:

- options
- futures
- short selling or buying on margin
- individual fixed income securities

In addition, we also allow you the opportunity to restrict certain types of investments from your account(s) based

on your situation and beliefs. Security exclusions may only exclude individual stocks, not mutual funds or exchange traded funds. These security exclusions may include investments in any of the following general areas:

- Alcohol
- Genocide
- Gambling
- Military Weapons and Firearms
- Nuclear Power
- Tobacco
- K-1 Stocks (these stocks can complicate the preparation of tax returns)

## Model Portfolios

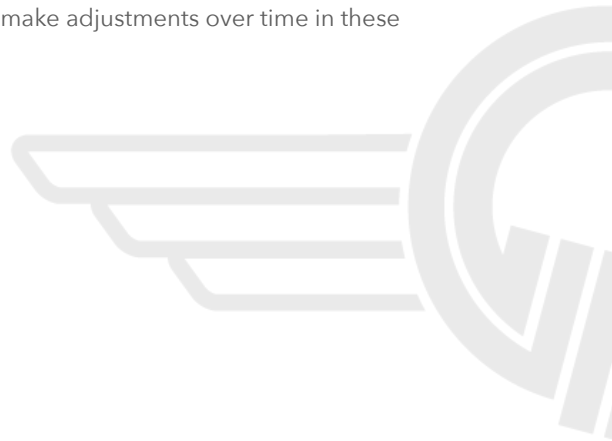
Our firm has designed and implemented what we call “model portfolios”. These model portfolios are sets of investments designed to deliver certain risk/return characteristics. We have created and currently manage ten total model portfolios ranging from conservative to aggressive. Each model portfolio generally holds between five and twenty securities and we closely monitor these portfolios and securities and make adjustments over time in these portfolios as needed.

The ten model portfolios that we currently offer are:

- BlackRock Tactical 10/90 Portfolio
- BlackRock Tactical 30/70 Portfolio
- BlackRock Tactical 50/50 Portfolio
- BlackRock Tactical 70/30 Portfolio
- BlackRock Tactical 90/10 Portfolio
- BlackRock Tactical Tax-Aware 10/90 Portfolio
- BlackRock Tactical Tax-Aware 30/70 Portfolio
- BlackRock Tactical Tax-Aware 50/50 Portfolio
- BlackRock Tactical Tax-Aware 70/30 Portfolio
- BlackRock Tactical Tax-Aware 90/10 Portfolio

We “subscribe” your investment account(s) to one of the ten model portfolios based on the outcome of your Discovery Meeting and your Investment Policy Statement. This means that your account(s) will then hold the same investments in roughly the same proportions as the most appropriate model portfolio.

We believe this is advantageous for you since our firm can closely monitor the ten model portfolios and thus closely monitor the investments in your account(s). As you can imagine, it is much easier for us to manage ten unique portfolios than to manage hundreds or thousands of unique client accounts. We believe this model portfolio arrangement allows us the best opportunity to deliver on our promise to manage your investments.





## Insurance Services

We provide insurance services generally through a review with you of your financial goals and risk exposures and determine with you if insurance products are appropriate to your specific financial needs. We may refer you, where appropriate, to Glide Path For Life, LLC for the purchase of fixed and fixed index annuities and/or life insurance to meet these specific financial needs. See "Other Financial Industry Activities and Affiliations" for more details.

## Educational Seminars

We may occasionally offer educational seminars on a variety of investment management, financial planning, and insurance topics. These seminars require no obligation from the attendees to purchase any products or services from our firm in order to participate. If the attendee decides to purchase any products or services from our firm, we will benefit financially. The attendees are able to purchase similar products and services from other firms and we encourage them to investigate their financial needs and other providers before making a decision where to acquire the needed products and/or services.

## Commitments

As a firm, we have made a unique commitment to our clients as part of the **ConciergeAdvice<sup>SM</sup>** package:

### Size of Practice

We are committed to closing our practice once there are 150 clients per advisor in the **ConciergeAdvice<sup>SM</sup>** program. We will track the total number of clients in the program. Once the total reaches 150 clients per advisor, the firm will be closed to new clients. Only if the total number of clients falls below 150 per advisor will a new client be added to the program up to the maximum of 150 total clients per advisor. We may hire additional advisors as long as the number of clients per advisor does not exceed 150.

## Information About Our Firm

We are owned by Washington Avenue Advisors LLC, an SEC-registered RIA (Registered Investment Advisor)..

As of February 22, 2022, we managed \$19,680,013 for our clients on a discretionary basis. "Discretionary" means that we make the decisions for our clients on what to buy or sell and when to buy or sell investments in their account(s). We do not provide any "non-discretionary" portfolio management.

# FEES AND COMPENSATION

## ConciergeAdvice<sup>SM</sup> Fees

The fees for our ConciergeAdvice<sup>SM</sup> service are deducted from your investment account(s) on a monthly basis (in arrears at the beginning of the following month). These fees are a percentage of the average daily asset balance (the average daily asset balance is determined by adding up the ending balance(s) of your account(s) for each day of the month and dividing this total by the number of days in the month) in your account(s) under our management using the following table:

Average Daily Asset Balance	Annual ConciergeAdvice <sup>SM</sup> Fee
up to \$1,000,000	0.99%
Over \$1,000,000	0.49%

The ConciergeAdvice<sup>SM</sup> fees applied to account values over \$2M are negotiable and any fee reduction is generally based on the following criteria:

- Historical relationship, anticipated future earnings capacity, anticipated future additional assets, related accounts, anticipated service levels, and negotiations with you.

In addition, a **minimum fee of \$85 per month** applies to all individual clients if their fee calculated using the ConciergeAdvice<sup>SM</sup> table is lower than \$85 per month. There are no minimum account balance requirements.

## Brokerage Fees

In addition to the fees you pay us, if you utilize our investment management services, there are brokerage fees you will incur from the custodian of your account(s). This brokerage fee is a percentage of the average daily asset

Average Daily Asset Balance	Annual Brokerage Fee
up to \$500,000	0.25%
\$500,000 to \$1,000,000	0.15%
over \$1,000,000	0.05%

balance in your account(s) under our management using the following table:

The brokerage fees are deducted from your investment account(s) on a monthly basis (in arrears at the beginning of the following month).

## Security-Related Fees

There may also be fees associated with the individual securities that you own in your account(s) that are charged by the investment management companies that offer these securities. Common examples are no-load mutual fund companies and exchange traded fund companies. These companies charge annual management fees and brokerage commissions. These expenses are disclosed in the prospectuses available from the fund companies and your custodian. Please contact us should you wish to review any prospectuses.

Please note that you have the option to purchase securities through other brokers or agents that we are not affiliated with. However, if you choose this option, we cannot execute trades on your behalf and that will become your responsibility.

## Hourly Fees

In addition, we may occasionally provide financial planning and other financial related services for clients on an hourly basis at \$210 per hour. An invoice describing these services and the applicable fees will be supplied to you. These fees are not applicable for ConciergeAdvice<sup>SM</sup> clients.

# PERFORMANCE-BASED FEES

Performance-based fees are defined as fees based on a share of the capital gains on or capital appreciation of the account(s) assets.

We do not use a performance-based fee structure because of the potential conflicts of interest. Performance-based compensation may create an incentive for us to recommend an investment that may carry a higher degree of risk to you in order to increase our fee income.

# TYPES OF CLIENTS

We generally provide our services to the following types of clients:

- individuals
- pension and profit sharing plans
- trusts
- estates
- charitable organizations
- small businesses

We have no minimum account sizes required to open or maintain an account with us.

# **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

## Methods of Analysis

Our security analysis method generally relies on fundamental analysis. Fundamental analysis involves analyzing the financial statements, management, competitive advantages, and the marketplace of a business.

However, at times we may employ any of the following types of analysis:

- Technical analysis: a discipline for forecasting the direction of prices through the study of past market data, primarily the price and volume of a security.
- Economic forecasting: the process of making predictions about an economy as a whole or in part and its effect on security prices.

The main sources of information include financial newspapers and magazines, research materials prepared by others, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

## Investment Strategies

The primary investment strategy used for your account(s) is strategic asset allocation utilizing a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments,

and then add active-management where we believe there are greater opportunities to make a difference. Your account(s) will be globally diversified to control the risk associated with individual markets.

Your investment strategy is based upon the objectives stated by you during consultations. You may change these objectives at any time. We will execute an Investment Policy Statement with you that documents your objectives and your desired investment strategy.

## Risk of Loss

All investing has certain risks that you will bear. Our investment approach constantly keeps the risk of loss in mind. However, you will face the following investment risks:

**Interest-Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Market Risk:** The price of a investment may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

**Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, investments are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

# **DISCIPLINARY INFORMATION**

## Legal and Disciplinary

Our firm and our employees have not been involved in legal or disciplinary events related to past or present investment clients including criminal or civil actions in a domestic, foreign or military court of competent jurisdiction; administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; and self-regulatory organization (SRO) proceedings.

# **OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

## Financial Industry Activities

Kenneth Svoboda also serves as a consultant for Blumark Tax Advisors, a Certified Public Accounting firm, and as an insurance agent for Glide Path For Life, LLC.

We may refer clients and others to Glide Path For Life, LLC for their insurance needs. Glide Path For Life, LLC may receive fees for these services from clients as well as receive commissions from insurance companies who issue policies to these clients. Kenneth Svoboda will benefit financially by this arrangement if insurance services are obtained. These insurance services are available from other agents and agencies and we encourage you to investigate your options of what insurance products are best for you and where they are best obtained. Glide Path For Life, LLC is a wholly owned subsidiary of Glide Path Advisors, LLC.

## Affiliations

We have no other affiliations.

# CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

## Code of Ethics

The employees of our firm have committed to a Code of Ethics that is available for review upon request.

## Participation or Interest in Client Transactions

Our firm and our employees may buy and/or sell securities that are also held by you. However, our firm and our employees may not trade these securities ahead of your trades. In addition, these transactions are governed by our firm's Compliance Policy Manual that each employee must follow.

## Gift Policy

Employees are prohibited from receiving or giving any gift, gratuity, hospitality or other offering of more than \$100 value from any person or entity doing business with us. This gift policy generally excludes items or events where the employee has reason to believe there is a legitimate business purpose.

## Personal Trading

To help monitor these policies, all employee trades are reviewed quarterly by our Chief Compliance Officer. Our Chief Compliance Officer's trades are reviewed by another executive of the firm. This insures that all executives' and employees' personal trades are reviewed to ensure compliance with our firm's procedures. In addition, we encourage our executives and employees to invest in the same securities and at the same time and price as your account(s) so that we have ownership in our recommendations. We believe that it is in your best interest if we own the same securities that we recommend you own. In these instances, we will also buy and sell them at the same time and price as in your account(s).

# BROKERAGE PRACTICES

## Selected Brokerage Firm

To work with our firm, we require you to utilize the services of Folio Investments, Inc. (Folio Investments). We have chosen Folio Investments based on their combination of brokerage services, financial condition, trade execution, brokerage fees, and customer service. We believe that they have the best business model and brokerage fees to match our investment methodology. We do not receive any income or tangible benefits from Folio Investments other than the brokerage and custodial services that they provide to you.

You should understand that not all advisors will require you to work with a certain brokerage firm as we do. In addition, by requiring you to use Folio Investments, you may not always receive the best trade execution and that trades could be more costly to you than trades available through other advisors and/or brokerage firms.

## Order Aggregation

Some trades that we place for you may enjoy the benefit of order aggregation. For stock and exchange trade fund trades, Folio Investments will aggregate all our firm's client's orders and attempt to match these orders internally with other Folio Investments' clients. These "matched" trades are generally executed at better prices than available from the market. Trades that cannot be matched will be sent to and fulfilled via the markets. Then once all trades are executed, Folio Investments will calculate the average price for both "matched" and market trades and all clients will receive the same executed price.

For other security types, most trades are placed together for affected clients and all clients receive the same execution price. This avoids any favoritism among clients and each of you receive the same purchase or sale price.

Only when a unique trade is placed for you (as opposed to a model portfolio trade), will your execution price possibly be different from other clients trades that may be taking place at the same time.

## Trade Errors

We have implemented a policy to handle any trade errors that may occur in your account(s). It is our policy to reasonably ensure you are made whole following a trade error. Specifically, if we cause a trade error to occur in your account(s) that results in a loss, we will reimburse you. If the trade error results in a gain, you will keep that gain.



# REVIEW OF ACCOUNTS

## Periodic Reviews

Based on our model portfolio design as explained in the “Advisory Business” section of this brochure, your account(s) are reviewed on a regular basis as part of our review of the securities held in your account(s). We review all securities at least every quarter as part of a quarterly Investment Committee Meeting (IC) and often on a more frequent basis.

The IC considers global financial conditions, market indicators, individual security attributes, asset allocation drift, and other factors to determine the strategic and tactical allocations for our models as well as the securities selected to go into these models.

## Review Triggers

In addition, there are other conditions that may trigger a review of the securities in your account(s). These other factors are changes in tax law; economic, political, global, and business news; earnings and other corporate news; market news; other new investment information; and changes in your own situation.

These reviews are generally conducted by our IC.

## Regular Reports

You will receive a monthly statement in your on-line Folio Investments account. This statement will detail your holdings and other account activity. Other reports are available upon request.

# CLIENT REFERRALS AND OTHER COMPENSATION

## Incoming Referrals

We have been fortunate to receive many client referrals over the years. We do not compensate referring parties for these referrals. Please see the “Other Financial Industry Activities and Affiliations” section of this Brochure for more details.

## Referrals Out

We do not accept referral fees or any form of compensation from other professionals when a prospect or client is referred to them. Please note that Glide Path For Life, LLC may receive compensation in the form of fees and/or commissions for insurance services and Kenneth Svoboda may receive a financial benefit from Glide Path For Life, LCC for such services rendered. Please see the “Other Financial Industry Activities and Affiliations” section of this Brochure for more details.

## Other Compensation

We do not receive any compensation from any other source except those already disclosed in this document.

# CUSTODY

## Account Statements

Your accounts are held at a qualified custodian, Folio Investments. Folio Investments provides monthly account statements either securely on-line at their website or via mail for a nominal charge. Please review these account statements carefully and let us know of any questions or discrepancies that you may have.

## Reports From Our Firm

Occasionally you may receive account reports from us. We encourage you to compare these reports from our firm with account reports received directly from Folio Investments in case there are any discrepancies. These reports from our firm are available upon request.

We do not maintain custody of your funds or securities, although you do allow us to process direct fee deductions from your account(s).

# INVESTMENT DISCRETION

## Discretionary Authority for Trading

We accept discretionary authority to manage your account(s) on your behalf. Discretionary authority means that you give us the authority to determine, without obtaining your specific consent for each transaction, the securities to be bought or sold, the amount of the securities to be bought or sold, and the time at which the securities will be bought or sold. You will provide us this discretionary authority by signing our Advisory Agreement. Please note that this authority is exercised keeping in mind the objectives set out in your Investment Policy Statement.

# VOTING CLIENT SECURITIES

## Proxy Votes

We do not vote, or provide advice on how to vote, proxies for securities held in your investment account(s). You are expected to vote your own proxies. If you wish to exercise this right, please let us know so that we can set up your Folio Investments on-line account access accordingly. All relevant proxy information and disclosures to help you understand and vote your proxies accordingly are available via the Folio Investments website.

# FINANCIAL INFORMATION

## Financial Condition

We do not have any financial impairment that will preclude us from meeting contractual commitments to you.

A balance sheet is not required to be provided because we do not require prepayment of fees of more than \$500 per client, six months or more in advance.

We have never been the subject of a bankruptcy petition.

# REQUIREMENTS FOR STATE-REGISTERED ADVISORS

## General

Details required for disclosure in this section regarding the background for officers & management persons, outside business activities, and performance-based fees are disclosed in other sections of this brochure. See the Performance-Based Fee section, Other Financial Industry Activities and Affiliations section, and the Brochure Supplement for additional details.

# DISCONTINUED SERVICE MODELS

## Summary

We have a number of clients that joined our firm under several previous business models prior to the launch of our current **ConciergeAdvice<sup>SM</sup>** platform. These previous service and fee models are no longer available to new clients. Details of these service models and the pricing that applies are available upon request.



# BROCHURE SUPPLEMENT

February 22, 2022 | Glide Path Advisors, LLC

This brochure supplement provides information about our investment advisors that supplements our firm's brochure. You should have received a copy of that brochure. Please contact us if you did not receive our firm's brochure or if you have any questions about the content of this supplement.

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

Kenneth J. Svoboda JD, CPA\*

## Investment Advisor Representative

117 E. Main Street, Suite 203  
Northville MI 48167

Phone: (248) 277-3470

Date of birth: 09/19/1957

## Educational Background

### Bachelor of Business Administration

University of Michigan - 1979

### Juris Doctor (JD)

Wayne State University - 1982

\*A certificate as a certified public accountant is issued to an individual who meets all of the following requirements:

- Is of good moral character.
- Has completed a curriculum required for a baccalaureate degree with a concentration in accounting at an educational institution approved by the State Accountancy Board.
- Has passed an examination in accounting, auditing, and other related subjects, acceptable to the State Accountancy Board.
- Shall have 1 year of qualifying experience under the direction and supervision of a licensed certified public accountant of this or another state.



## Business Experience

### **Glide Path Advisors, LLC**

Investment Advisor Representative | 2008-present

### **Glide Path For Life, LLC**

Insurance Agent | 2013-present

### **Blumark Tax Advisors**

Consultant | 2021-present

### **The Svoboda Group, LLC**

Managing Member | 2005-2021

## Disciplinary Information

Kenneth Svoboda has not been involved in legal or disciplinary events related to past or present investment clients including criminal or civil actions in a domestic, foreign or military court of competent jurisdiction; administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; and self-regulatory organization (SRO) proceedings.

## Other Business Activities

Kenneth Svoboda also serves as a consultant for Blumark Tax Advisors, a Certified Public Accounting firm. Kenneth Svoboda spends approximately 70% of his time on Blumark Tax Advisors' matters.

Kenneth Svoboda is an Insurance Agent for Glide Path For Life, LLC. Glide Path For Life, LLC is a licensed insurance agency. Kenneth Svoboda spends approximately 5% of his time on Glide Path For Life, LLC matters. Glide Path For Life, LLC is a wholly owned subsidiary of Glide Path Advisors, LLC.

## Additional Compensation

None

## Supervision

Kenneth Svoboda is supervised by Nicholas Pope. He reviews Kenneth Svoboda's work through frequent personal, phone, and email contact.

Nicholas' contact information is:

**Phone:** (517) 346-5165

**Email:** npope@waadvisors.com

## Requirements for State Registered Advisors

Kenneth Svoboda has not been involved in any arbitration claims; civil, self-regulatory organization, or administrative proceedings; or any bankruptcy petitions.





# PRIVACY POLICY

## Our Promise to You

As a client of Glide Path Advisors, LLC (Glide Path), you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

### Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net worth, assets, income, bank account information and account balances.

### How We Manage and Protect Your Personal Information

Glide Path collects nonpublic information about clients and consumers. We will not share nonpublic personal information about clients or consumers with third parties not affiliated with Glide Path, except as noted below.

Specifically, Glide Path may share personal information as necessary:

- To complete transactions or account changes as directed by the client;
- To maintain or service a client's account;
- If requested to do so by a client;
- With contracted service providers providing administrative functions for Glide Path; or
- If Glide Path is required or permitted by law or regulatory authorities with jurisdiction over the firm to do so.
- Glide Path will maintain administrative, technical and physical safeguards reasonably designed to ensure the security and confidentiality of client records and information. To protect this information, we:
- Require new employees to review and acknowledge the firm's compliance policy manual, which includes this privacy policy, and all employees to review and acknowledge the compliance policy manual annually.

- Prohibit an employee from providing client information over the telephone or in response to an e-mail message unless the employee has identified the other person as the client, a fiduciary representative of the client, an authorized agent of the client or a party that needs the information to complete a transaction for the client (such as broker-dealers, custodians or administrative service providers).
- Limit access to confidential information about clients to those employees who need to know such information.
- Maintain appropriate security measures for our computer and information systems, including the use of passwords and firewalls.
- Use a shredding machine, locks and other appropriate physical security measures to safeguard client information stored in paper format. For example, employees are expected to secure client information within locked cabinets when the office is closed.
- Engage a third party service provider only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential personal information except as necessary to carry out its assigned responsibilities and only for that purpose.

## When Must We Give You Our Privacy Policy

The following notice requirements apply to Glide Path's clients.

### Initial Privacy Notices

We will deliver an initial privacy notice to a client before the client relationship is established - that is, before we begin to deliver any contracted services.

### Annual or Revised Privacy Notices

We will deliver our privacy notice to clients on an annual basis, defined as every 12 months or upon making any changes to it. We are not required to deliver annual privacy notices to former clients.

## Definitions

For purposes of this policy, the terms "Consumer", "Client" and "Confidential Information" have the following definitions:

- "Consumer" is not necessarily a client but may be anyone who obtains financial products or services from Glide Path used primarily for personal, family or household purposes. Examples of consumer relationships include: (1) a prospect with whom Glide Path is actively pursuing an investment relationship; or (2) a prospect who provides Glide Path with nonpublic information (such as net worth information or potential portfolio size) after attending a seminar or community event or listening to a radio talk show at which an employee of Glide Path is a featured speaker.

- “Client” means (1) an individual with a specific and continuous relationship with Glide Path who obtains or has obtained a financial product or service from Glide Path used primarily for personal, family or household purposes; or (2) that individual’s designated representative.
- “Confidential Information” is personally identifiable private information (information not available from public sources such as the phone book or a website) about the client or consumer, including information regarding name and address, age, social security number, assets, income, net-worth, account balance, account number, bank account information, beneficiary information and investment activity (such as purchase and redemption history).

**Please do not hesitate to contact us with questions about this notice.**



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