

## Item 1. Introduction

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

## Item 2. Relationships and Services

### What investment services and advice can you provide me?

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

Pursuant to TIFIN Grow’s Terms of Use, TIFIN Grow provides you the ability to complete the profile questionnaire, discover your profile and receive investment recommendations. If you are working with a financial advisor, you may also link your external investment accounts to the platform for easy access to trade execution. In certain circumstances, your advisor may also engage TIFIN Grow to provide discretionary investment advisory services over some or all of the brokerage accounts you link to the platform.

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

If your advisor engages TIFIN Grow as a Sub-Advisor to provide discretionary investment advisory services to your account, TIFIN Grow will have discretionary authority to invest and trade your assets in ETFs and/or mutual funds, subject to any specific limitations set forth in the sub-advisory agreement, using the external investment accounts you have linked to the platform. If TIFIN Grow has discretionary authority over your individual accounts, your accounts will be monitored at least quarterly by TIFIN Grow’s Research Team. **Requirements to Open and Maintain an Account:** TIFIN Grow provides the profile questionnaire, delivers profiles and makes certain investment recommendations regarding ETFs and mutual funds without charge.

TIFIN Grow’s proprietary web-based technology allows Wealth Managers to score their client’s risk capacity, risk preference and the portfolio risk of their current portfolio. Using this information, through the use of TIFIN Grow’s technology, Wealth Managers can help their clients select the portfolio holdings to match their specific risk profile and investment goals through a set of model portfolios maintained by third party providers who may pay TIFIN Grow a sponsorship fee. Alternatively, the Wealth Managers can upload and select their own custom portfolios based on the Client’s risk profile and investment goals. Clients may also sync their external investment accounts to the platform and execute trades for proposed investments directly.

TIFIN Grow provides conversational AI financial planning technology to help Wealth Managers provide financial planning services to their clients. TIFIN Grow’s proprietary web-based technology allows Wealth managers to assist their clients with financial planning needs based on their current financial circumstances and future needs and goals.

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

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

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

### Item 3. Fees, Costs, Conflicts & Standard of Conduct

#### What fees will I pay?

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

The sub-advisor annual fee will be between 0.2% - 0.5%, subject to negotiation, billed quarterly in arrears based on the average daily balance of the sub-advisory account for that billing period. For accounts opened or closed mid-billing period, fees will be prorated based on the day's services are provided during the given period. Wealth Managers may also be subject to an initial set-up fee.

Fees are subject to negotiation and vary among clients. TIFIN Grow's fees do not include any custodial or brokerage expenses that a client's custodian or broker may charge. You will typically pay transaction and/or custodial expenses in connection with implementing any of TIFIN Grow's recommendations. These transaction and/or custodial expenses vary and are based on your agreement with your account custodian and/or broker-dealer. Please see Item 5 of our [Form ADV](#) as well as the Terms of Use and your advisory agreement for a full disclosure of relevant fees, costs and expenses.

TIFIN Grow may also receive subscription-based fees from Wealth Managers for use of certain platforms.

For additional information regarding fees and expenses, please see Item 5 of our [Form ADV](#), section entitled Fees and Compensation.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**

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

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

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

**When we act as your investment adviser**, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask about these conflicts because they can affect the investment advice we provide to you.

**For additional information** regarding our management of potential conflicts of interests, please see Item 10 of our [Form ADV](#).

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

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

#### How do your financial professionals make money?

We do not employ financial professionals or financial advisors to provide investment advice. Our investment services are entirely managed by software. TIFIN Grow's sources of revenue include Management Fees received in connection with exercising discretionary investment authority over certain client accounts, if authorized by an Wealth Manager. Our Wealth Managers pay us Portfolio Fees in exchange for utilizing services made available through our platform. Subscription fees are charged for Wealth Managers' use of certain platforms.

### Item 4. Do you or your financial professionals have legal or disciplinary history?

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

### Item 5. Additional Information

If you would like additional information about our services or to request a copy of the relationship summary, please contact us at [info@tifingrow.com](mailto:info@tifingrow.com).

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

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