

# Form ADV Part 3 – Customer Relationship Summary

Date: 06/17/2024

## Item 1: Introduction

PensionBee Inc. is an investment adviser registered with the Securities and Exchange Commission. We offer internet adviser portfolio management services via a wrap fee program. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

## Item 2: Relationships and Services

What investment services and advice can you provide me? Our firm offers internet adviser portfolio management services via a wrap fee program to retail customers rolling over or transferring defined contribution retirement accounts (e.g. 401(k)'s) into a new Individual Retirement Account (IRA). We review your portfolio, investment strategy, and investments through an online interface. Internet adviser portfolio management accounts are not reviewed by the firm, save for annual automated allocation revisions and regular realignments within model portfolios offered by our firm. We do *not* monitor customer accounts on an ongoing basis. Our firm offers both discretionary advisory services (where our firm makes the decision regarding the purchase or sale of investments) as well as non-discretionary services (where the retail investor makes the ultimate decision). Our firm offers model portfolio exchange traded funds ("ETFs") provided by a third party. Our firm does not offer proprietary products. Our firm does *not* have a minimum account size. See our Form ADV Part 2A ("[Brochure](#)"), Items 4 & 7.

***Questions to ask 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?*

## Item 3: Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? Our customers pay a fee based on assets under management. Additionally, the amount of assets in your account affects our fee; the more assets you have in your advisory account, the more you will pay us. We have an incentive to encourage you to increase those assets in order to increase our fee. When a customer signs up to an account with us they authorize for our fees to be withdrawn on a monthly basis directly from their account with us. You pay our fees even if you do not have any transactions. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

Our wrap fee program includes ETF management fees, custody fees and advisory fees, however as is typical with other investment services, there are additional transaction fees outside of our wrap fee program (such as execution fees, product-level fees and additional fees you pay to a custodian). See Item 4.C of our [Brochure](#). Additionally, you will pay an administrative account closing fee to our custodian (currently set at \$50 per account closure). As a wrap fee combines certain transaction fees our fee is higher than if you paid transaction fees separately. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of**

# Form ADV Part 3 – Customer Relationship Summary

Date: 06/17/2024

money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please also see our [Brochure](#) for additional details.

*Questions to ask 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 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. See our [Brochure](#) for additional details. Here are some examples to help you understand what this means:

- **Management of Wrap Fee Program.** Because we manage our portfolio in a wrap fee program, we have an incentive to limit trading in your account and to favor asset types that do not have certain transaction fees in order to minimize trading expenses that we would have to normally pay out of our management fee.
- **ETF Model Provider.** SSGA Funds Management, Inc. is our exclusive ETF model provider. We receive reimbursement payments from State Street Global Advisors Funds Distributors LLC for certain costs we incur in marketing the ETFs included in the models, including the distribution of marketing materials for certain of the ETFs.

*Questions to ask us: How might your conflicts of interest affect me, and how will you address them?*

How do you make money? Primarily, we receive cash compensation from the services we provide to you through the fees we receive from you. See our [Brochure](#) for additional details.

## Item 4: Disciplinary History

Do you or your team members have legal or disciplinary history? No, we do not have legal or disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

*Questions to ask us: Do you or members of your team have any disciplinary history? For what type of conduct?*

## Item 5: Additional Information

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/331741> and any individual brochure supplement your representative provides. If you have any questions, need additional information, or want another copy of this Customer Relationship Summary, then please contact us at (786) 808 8090.