Item 1 Cover Page



Datalign
One Kendall Square B2201
Cambridge, MA 02139

www.DatalignAdvisory.com

October 30, 2026

This brochure provides information about the qualifications and business practices of Datalign. If you have any questions about the contents of this brochure, please contact us at (781) 228-5678. 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. Registration as a registered investment adviser does not imply a certain level of skill or training.

Additional information about Datalign also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

May 21, 2026: Item 4 was modified to disclose Datalign's Concierge may directly contact Consumers to collect, confirm, or update information. Item 5 was modified to disclose that in certain circumstances the Consumer may be matched with up to three Participating Advisers, each of which will pay Datalign a referral fee.

October 30, 2026: Item 4 was modified to disclose Datalign provides matching and referral services to Participating Financial Institutions other than Participating Advisers. Item 5 was modified to disclose the receipt of referral fees for the new matching and referral services.

The material changes discussed above are only those changes that have been made to this Brochure since the firm's last annual update of the Brochure. The date of the last annual update of the Brochure was February 2, 2026.

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Item 4 Advisory Business

Datalign is a technology-based firm designed to match prospective investment advisory service consumers ("Consumer" or "Consumers") with unaffiliated investment advisers based on the Consumer's self-reported personal financial information, location, required services and desired relationship with an adviser. Datalign was formed in September 2021 and its principal owner is Impact Ready Holdings, LLC. Impact Ready Holdings, LLC is indirectly owned by David Blundin.

Datalign's principal service is providing advice over the Internet for Consumers seeking introductions to third-party investment advisers. Datalign does not manage Consumers' assets, and the advice it provides is limited to matching Consumers with suitable third-party investment advisers that have elected to participate in Datalign's matching platform ("Participating Advisers"). Datalign's fully interactive Internet-based matching service utilizes questionnaires that Consumers are required to complete regarding their personal and financial circumstances, including the Consumer's age, location, financial experience, investable assets, income, desired services, preference for remote or in-person meetings, investment objectives, and investment risk tolerance. Participating Advisers are screened for current state or federal registration status, disciplinary history, and advisory services offered. Participating Advisers are interviewed to determine their areas of expertise with regard to investment management and financial planning, and preferred region and types of clients. The information that is collected allows Datalign to form an initial basis for a match between a Consumer and Participating Adviser that meets the Consumer's specifications, based on the information provided by the Consumer and Participating Advisers. A Consumer is then introduced to up to three suitable Participating Adviser through the Datalign platform. Once Datalign introduces a Consumer to a Participating Adviser, the Consumer and Participating Adviser will communicate outside of the Datalign platform and determine whether they would like to engage in an investment advisory relationship together. The Consumer retains sole decision-making responsibility of whether to engage in an advisory relationship with a matched Participating Adviser.

Datalign's fully interactive Internet-based matching service compares the Consumer's questionnaire responses to Datalign's network of Participating Advisors. In certain circumstances, a Datalign Concierge may contact the Consumer directly via telephone or video conference to collect, confirm, or update Consumer information. Following this interaction, Datalign's Internet-based platform will complete the matching services.

In consideration for making introductions, Datalign is paid a fee by each Participating Adviser. As a result, Datalign's business model includes an inherent conflict of interest because it has an incentive to introduce a Consumer to a Participating Adviser even if a suitable Participating Adviser is not available. Datalign makes no guarantee that each introduced Participating Adviser will be successful in advising any particular Consumer, nor does it make suitability determinations about any strategy, product, or offering for a particular Consumer. However, Datalign is a fiduciary to Consumers and Participating Advisers and as a fiduciary is obligated to place its customers' interests of its own in every situation. If no Participating Advisers are deemed appropriate by Datalign based on a Consumer's profile, no introduction will be made.

Datalign does not provide any advice regarding specific investments or securities, nor does it participate in the management of Consumers' accounts. Although Datalign makes introductions it believes are suitable based on the information provided by the Consumer and Participating Adviser, it does not analyze or recommend particular strategies or offerings of a Participating Adviser, or make suitability determinations about any such strategy, product, or offering for a particular Consumer. Further, Datalign does not assess the fees charged by Participating Advisers, although Datalign will review Participating Advisers' fee schedules during the initial screening and interview process. Datalign will only introduce Consumers to Participating Advisers, and Consumers should be aware that other investment advisers not on Datalign's platform may be more suitable for the Consumers' specifications and financial circumstance. Datalign does not maintain an ongoing relationship with Consumers. For a more fulsome discussion of Datalign's methods of analysis, please refer to Item 8 below.

Except for the verification of Consumers via its telephone or video conference Concierge service, Datalign provides all services to Consumers solely through its fully interactive Internet-based platform. Datalign only introduces Consumers to Participating Advisers with which it has referral agreements. Consumers are not obligated to engage with any Participating Adviser matched through the Datalign platform. Datalign may utilize third-party enrichment data to enhance the Consumer information it provides to Participating Advisers.

Beginning in October 2026, Datalign's fully interactive Internet-based matching service may also compare the Consumer's questionnaire responses and information collected through other sources to Datalign's network of Participating Financial Institutions. Financial Institutions include other financial industry companies such as banks, credit card companies, and insurance providers. Based on a Consumer's information, Datalign may recommend a Financial Opportunity to the Consumer. For example, Datalign may recommend that the Consumer look into a certain type of credit card based on the Consumer's credit worthiness, income, and spending habits. When the Consumer selects a Financial Opportunity, they will be directed to the Financial Institution's third-party website. Datalign will not share any of the Consumer's information with the Participating Financial Institution. If Datalign's platform matches and introduces a Consumer to a Participating Adviser, Datalign will share with that Participating Adviser any Financial Opportunity the Consumer has completed, to the extent Datalign is aware of any. After matching and introducing the Consumer to a Participating Adviser, the Participating Adviser will decide whether any Financial Opportunity/ies may be recommended by Datalign to the Consumer. Datalign will not show any Financial Opportunity to a Consumer if the Financial Opportunity conflicts with a matched Participating Adviser's services.

Financial Opportunities are provided as a courtesy and for educational purposes only. They are not intended as investment or financial advice and do not create an investment advisory relationship between the Consumer and Datalign. Suggestions are based on algorithms developed by Datalign, historical data, and Consumer-provided information. Suggestions are deemed appropriate for the Consumer's profile and goals based on the information provided by the Consumer and obtained from other sources. However, Datalign's platform has limitations and the Consumer is encouraged to consult with a qualified financial professional before making any investment and financial decisions.

Datalign does not provide portfolio management services to wrap fee programs.

Since Datalign does not manage Consumers' assets or have the ability to hire or fire managers on behalf of its Consumers, Datalign does not have regulatory assets under management.

Item 5 Fees and Compensation

Datalign does not charge fees to the Consumers that participate on Datalign's platform. However, Consumers will likely incur fees or charges that are imposed by third parties, unaffiliated with Datalign, in connection with any services they choose to receive from a Participating Adviser. Participating Advisers pay Datalign a referral fee in connection with each introduction made through the Datalign platform. The referral fee is a one-time fee that is paid to Datalign whether or not the Consumer ultimately decides to enter into an advisory relationship with a Participating Adviser. The referral fee will be paid to Datalign either at the time of the introduction or at the end of the month in which the introduction was made, depending on the terms of the referral agreement that Datalign maintains with the respective Participating Adviser.

Datalign is paid by Participating Advisers for each introduction, and Datalign will only receive compensation if an introduction is made. This creates a conflict of interest, as Datalign has an incentive to introduce Consumers to Participating Advisers even if a suitable Participating Adviser is not available. In addition, Participating Advisers may pay different levels of fees based on a combination of demand and profile of the Consumers matched and introduced. Certain Participating Advisers may have larger budgets and may be included more frequently in Consumer lead placements because of their greater spending power. This creates a conflict of interest because Datalign could generate more revenue by introducing Consumers to the Participating Adviser willing to spend the most, rather than the adviser that best suits a Consumer's needs. Datalign mitigates these conflicts by only introducing Consumers to Participating Advisers that are deemed suitable and match based on information Consumers self-report through the Datalign platform and Datalign's Concierge. Where multiple Participating Advisers meet the requirements identified by a Consumer and are deemed to be equally suitable, the introduction will be prioritized based on demand level and the Participating Adviser that is willing to pay Datalign the highest referral fee, as determined through an auction. In certain instances, up to three Participating Advisers will be matched with the Consumer and each Participating Adviser will pay Datalign a referral fee. The Consumer will be contacted by all three Participating Advisers and the Consumer will decide which, if any, of the Participating Advisers to engage with in an investment advisory relationship.

In addition to receiving compensation based on the referral and introduction of Consumers to Participating Advisers, Datalign is compensated by other Participating Financial Institutions when a Consumer signs up for or completes a Financial Opportunity. Payments from Participating Financial Institutions do not affect which Financial Opportunities the Consumer sees, or the order in which they are received. Datalign does not charge fees to the Consumer that participate on Datalign's platform and receive Financial Opportunities. However, Consumers will likely incur fees or charges that are imposed by Participating Financial Institutions if the Consumer signs up for or completes a Financial Opportunity. Datalign will only receive compensation if the Consumer signs up for or completes the Financial Opportunity. This creates a conflict of interest because Datalign has an incentive to prioritize and recommend Financial Opportunities offered by

Participating Financial Institutions willing to pay the highest referral fees, rather than a Financial Opportunity that best suits a Consumer's needs. Datalign mitigates this conflict by only recommending Financial Opportunities offered by Participating Financial Institutions that are deemed suitable based on the self-reported information provided by the Consumer, as well as any information collected by Datalign and/or other sources.

Neither Datalign nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6 Performance-Based Fees and Side-by-Side Management

Datalign does not charge performance-based fees.

Item 7 Types of Clients

Datalign matches individual Consumers to suitable Participating Advisers and Participating Financial Institutions. Participating Advisers must be registered investment advisers either with the SEC or one or more state securities regulator. There are no minimum requirements for Consumers to use the Datalign platform.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Datalign does not manage assets for Consumers, and therefore does not employ any investment strategies. Consumers should refer to the Form ADV Brochure of any Participating Adviser to which it receives an introduction in assessing the advisory services offered and related methods of analysis and applicable risks. Consumers should refer to the offering documents, terms and conditions, or other important disclosures provided by any Participating Financial Institution for any Financial Opportunity. Because each Consumer's personal and financial situation is unique, Datalign encourages Consumers to speak with a financial professional before deciding on a Financial Opportunity.

Datalign utilizes fully interactive Internet-based questionnaires that Consumers are required to complete, which allow Datalign to make informed recommendations and introductions to Participating Advisers. This questionnaire covers information including, but not limited to: age, investable assets, income, time to retirement, location, desired services, and risk tolerance. Each Participating Adviser also completes a questionnaire regarding its preferred Consumer profile, advisory services it offers, and is screened for appropriate State or Federal registration status. Datalign also screens the Participating Advisers that participate with the matching platform for certain disciplinary issues. Datalign reviews and considers any disciplinary issues of prospective Participating Advisers, as necessary. The information provided by Consumers and Participating Advisers is then used to form the basis of an initial introduction.

Material Risk Factors

Investing in securities involves risk of loss that Consumers should be prepared to bear.

Reliance on Participating Advisers:
The investment success of Consumers utilizing Datalign's platform is substantially dependent upon the skills of an introduced Participating Adviser and its personnel in sourcing, selecting, and monitoring investments. There can be no assurance that a Participating Adviser will successfully identify investments that fulfil a Consumer's investment objective or that a Participating Adviser's investment recommendations will not cause the Consumer to experience investment losses. Any prior success of a Participating Adviser or its personnel should not be construed as assuring any level of future success or profitability. Datalign does not monitor or review the Participating Advisers' past performance. Datalign does not monitor the Consumer's account, or any other accounts managed by Participating Advisers. Datalign also does not analyze or recommend particular strategies or offerings of a Participating Adviser, or make suitability determinations about any such strategy, product, or offering for a particular Consumer, nor does Datalign assess Participating Advisers' fees. Accordingly, when considering whether to become an advisory client of a Participating Adviser, Consumers should carefully review the Participating Adviser's Form ADV, Form CRS, and any other disclosure documents.

Potential of Loss:
An investment with a Participating Adviser may entail a high degree of risk. There is no assurance that Participating Advisers will achieve the investment objective of any Consumer or that the strategies or recommendations offered by a Participating Adviser will be successful. Given these factors, there exists a possibility that a Consumer could suffer a substantial or total loss as a result of an investment with any Participating Adviser matched and introduced by Datalign.

Cybersecurity and Disaster Recovery:
Cyber incidents (including cyber attacks) affecting Datalign and its various service providers have the ability to disrupt and impact business operations, potentially resulting in interference with Datalign's ability to provide suitable matches and introductions to Consumers, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage or additional compliance costs. Cyber attacks include, but are not limited to, gaining unauthorized access to digital systems (e.g., through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cyber attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial-of-service attacks on websites (i.e., efforts to make network services unavailable to intended users). Similar adverse consequences could result from cyber incidents affecting Participating Advisers, counterparties which engage in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies, other financial institutions and other parties. In addition, substantial costs may be incurred in order to prevent any cyber incidents in the future.

While Datalign's continuity plans and risk management systems are designed to prevent and mitigate cyber incidents and other disasters, there is no assurance that any of these disaster recovery plans will work. Furthermore, Datalign cannot control the cyber security plans and

systems put in place by its service providers or any other third parties whose operations may affect a Consumer or Participating Adviser. As a result, Consumers and Participating Advisers could be negatively impacted.

An investment with a Participating Adviser matched and introduced by Datalign may entail a high degree of risk. There can be no assurance that Participating Advisers will achieve the investment objective of any Consumer or that the strategies offered by a Participating Adviser will be successful. Given these factors, there exists a possibility that a Consumer could suffer a substantial or total loss as a result of an investment with any Participating Adviser matched and introduced by Datalign.

Reliance on Technology:
The Datalign platform relies on a variety of computer hardware and software systems and platforms, some of which may be proprietary while others may be licensed from third parties (such systems and platforms, collectively, "Computer Systems"). Incorrect data, including stale or missing data, hardware or software malfunctions, programming inaccuracies, and similar errors may impair the performance of Computer Systems, which may negatively affect introductions to Participating Advisers. The platform utilized by Datalign is fundamentally dependent on technology, including hardware, software, and telecommunications systems. The data gathering, risk management, operational, back office, and accounting systems, among others, utilized by Datalign are all highly automated and computerized. Such automation and computerization is dependent upon an extensive amount of proprietary software and third-party hardware and software. Such software and hardware are known to have errors, omissions, imperfections and malfunctions. These errors, omissions, imperfections and malfunctions are generally entirely outside of the control of Datalign. To the extent that a software or hardware malfunction or problem is caused by a defect, security breach, virus or other outside force, the Consumers and Participating Advisers may be materially adversely affected.

Acts of God and Geopolitical Risks:
The performance of Consumers' accounts could be impacted by acts of God or other unforeseen and/or uncontrollable events (collectively, "Disruptions"), including, but not limited to, natural disasters, public health emergencies (including any outbreak or threat of COVID-19, SARS, H1N1/09 flu, avian flu, other coronavirus, Ebola, or other existing or new pandemic or epidemic diseases), terrorism, social and political discord, geopolitical events, national and international political circumstances, and other unforeseen and/or uncontrollable events with widespread impact.

The extent of the impact of any such Disruptions on Datalign, Participating Advisers, and potentially Consumers' assets, will depend on many factors, including the duration and scope of such Disruptions. In addition, there is a risk that a Disruption will significantly impact the operations of Datalign, the Participating Advisers, and the underlying portfolio companies in a Consumer's account, or even temporarily or permanently halt their operations.

Risks of AI Use
The Datalign platform relies on proprietary artificial intelligence ("AI") tools to analyze Consumer and Participating Adviser information, generate and review marketing and educational content,

respond to certain communications, improve efficiency, increase scalability, and ensure service consistency. The use of AI involves risks. Those risks may include, but are not limited to: inaccurate, incomplete, biased or untimely advice; data quality; privacy and cybersecurity; drift and technological change. Datalign's engineers continuously monitor software and routinely conduct testing to ensure the Datalign platform performs as expected. However, monitoring and testing cannot eliminate all AI-related risks and there is no assurance that Datalign's platform will always function as intended to produce error-free results.

Item 9 Disciplinary Information

Neither Datalign nor its management persons have any legal or disciplinary events to report in response to this item.

Item 10 Other Financial Industry Activities and Affiliations

Neither Datalign nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Datalign nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Datalign does not currently have any relationships or arrangements that are material to its advisory business with any related persons. Datalign does, however, enter into relationships with unaffiliated internet companies that market Datalign's platform and/or otherwise host Datalign content on their websites.

Datalign matches and introduces Consumers to Participating Advisers and Participating Financial Institutions as described in Item 4 above. Datalign is only compensated by the Participating Advisers and Participating Financial Institutions for the introduction and is not paid any fees by the Consumer. As a result of this business model, Datalign has a conflict of interest that is described in Items 4 and 5 above.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Datalign has adopted a Code of Ethics pursuant to SEC rule 204A-1. This Code of Ethics sets forth the basic policies of ethical conduct for all of Datalign's employees. In addition, the Code of Ethics governs personal trading by each employee of Datalign deemed to be an "access person" and is intended to ensure that securities transactions effected by access persons of Datalign are conducted in a manner that avoids any conflict of interest between such persons and the Consumers. Datalign collects and maintains records of securities holdings and securities transactions effected by these access persons. Datalign will provide a copy of the Code of Ethics to any Consumer upon request.

Datalign does not recommend to Consumers, or buy or sell for any Consumers' accounts, securities in which the firm or a related person has a material financial interest.

Datalign has no registered investment adviser representatives.

Item 12 Brokerage Practices

Datalign serves as an adviser for Consumers seeking introductions to third-party investment advisers. Datalign does not manage Consumers' assets, and the advice it provides is limited to matching Consumers with suitable Participating Advisers. Datalign does not place transactions for or on behalf of Consumers and therefore, does not select or recommend broker-dealers or custodians to Consumers, nor does it otherwise engage in brokerage practices.

Item 13 Review of Accounts

As described above, Datalign's business is limited to matching and introducing Consumers to Participating Advisers over the Internet. Datalign does not have ongoing relationships with Consumers and therefore does not provide either initial or ongoing review of Consumer accounts or assets. The decision as to whether to become a client of a Participating Adviser is solely that of the Consumer. After the introduction is made, Datalign does not assess whether a particular strategy, product, or offering of a Participating Adviser is suitable for a particular Consumer, nor does Datalign assess the Participating Adviser's fees. Rather, Datalign provides point-in-time introductions based on the criteria discussed in Items 4 and 8 above, and does not assess whether a Participating Adviser or its services continue to be appropriate for a Consumer after the introduction is made. Datalign also does not provide regular reports to Consumers.

Item 14 Client Referrals and Other Compensation

Datalign is compensated by Participating Advisers and Participating Financial Institutions for matching Consumers and making introductions, as described in Items 4 and 5. Datalign maintains marketing relationships with third-party internet companies that market Datalign's platform and/or otherwise host Datalign content on their websites. Datalign compensates these third-party entities in proportion to the profits that Datalign receives in connection with their services.

Item 15 Custody

Datalign does not have custody of Consumer funds or securities.

Item 16 Investment Discretion

Datalign does not have investment discretion.

Item 17 Voting Client Securities

Datalign does not vote, or advise Consumers how to vote, proxies for securities. Datalign will not give any advice or take any action with respect to the voting of proxies, and does not participate

in class actions on behalf of Consumers. Datalign encourages Consumers to discuss the proxy and class action policies with any Participating Adviser they employ.

Item 18 Financial Information

Datalign does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance. Datalign has never been subject to a bankruptcy petition.