



## **BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN**

### **Policy**

The Company's policy is to attempt to provide continuous and uninterrupted services to our clients. However, as a result of any significant business disruption or loss of key personnel, defined as Chairman, President, or Executive Vice President the Company will act immediately to quickly recover and resume operations, protecting all of the firm's books and records, and allowing our clients to transact business. In the event that we determine we are unable to continue our business, we will make every effort to assure clients prompt access to their funds and securities.

### **Telephone Service/Fax**

In the event the Company's primary telephone line is disrupted, phone and fax lines will be forwarded to 813-264-0440.

### **Temporary Operation Location/Recovery Site**

If the primary office is inaccessible, the Company will temporarily relocate to the following address:

2701 N. Rocky Point Dr., Suite 1000, Tampa, FL 33607

### **Responsibility**

The CCO is responsible for creating and maintaining the Company's immediate and long-term contingency planning and recovery procedures that are appropriate to the scale and scope of the Company's business.

### **Procedures**

#### **Notification of Proper Authorities**

After an emergency has been declared, the CCO, or designee, will notify the proper regulatory authorities of the nature of the emergency, and the temporary location of the firm. Additionally, the same party will notify the local public utilities, the telephone company, the post office and any other vendor as deemed necessary.

Client data is easily accessible at any remote location with Internet access as client data, including email correspondence and pertinent books and records are backed up daily to the Company's hard drive and then daily to an archive disk. The daily archive disk is maintained away from the Company's primary business location to allow for retrieval of client records where the primary office location is not accessible.

### **Equipment/Hardware**

The Company will maintain a list of all equipment, hardware and software, used by the Company. The list shall contain the item, the serial number, the manufacturers and serial/registration number. The CCO will notify the Company's insurance company of any damage.

If the Company's computer system is deemed unusable for any reason, the Company will procure another computer at that time. Time constraints for the purchase, delivery, and installation of a computer will depend on a number of outside factors such as the retailer, delivery services, and the consultant hired to install the computer, but it is expected that the Company will only be without a computer for a maximum of two business days. Once the new computer is installed, the last tape backup will be restored to the new system.

### **Mail Service**

Mail will be forwarded to the temporary office location listed above.

### **Client Information and Client Trading Records**

Original client agreements, contracts, profiles, and other documentation related to each client as well as trading records, brokerage statements and confirmations are maintained at the principal place of business for the appropriate time that is required by law.

Copies of pertinent client information shall be kept at a secure off-site location. If it is not practical to keep paper copies, electronic facsimiles may be kept in a format that is easily retrievable, i.e. pdf, tif, gif, etc., and in a timely manner. Periodically, the CCO will review these disaster recovery plans pertaining to client's records to assure that these records will be adequately maintained in the event of a disaster or emergency.

### **Custodian**

Copies of all client records are also maintained by the custodian(s) holding the client's assets. The Company can access all client files from the custodian's facilities should the need arise. If a client needed immediate access to their account, and for any reason could not contact Company, the client could contact his or her custodian(s) directly.

### **Client Contact**

If a disaster occurs, every effort will be made by the Company to contact all clients. This will either be done by phone calls, emails, general mailing, and/or posting a message on the Company website. A list of all clients is maintained in the Company's account management system and can also be received by contacting the relevant account custodian.

### **Financial Data/Resources**

The Company's financial information is stored in a Financial Software data file that is included in the backup procedures discussed above.

Company has adequate liquid reserves to maintain business continuity, and shall acquire business insurance if deemed necessary.

### **Updates and Annual Review**

The Company will update this plan whenever there is a material change to the Company's operations, structure, business or location or to those of our custodian (or any other critical service providers). In addition, the Company will update the plan, at least annually, to ensure the plan remains consistent with the Company's policy and overall business operations.