

## **BUSINESS CONTINUITY PLAN**

In the event of a disaster, TAP intends to continue to maintain business relations with its clients to the extent applicable. Given the nature of the business and our disaster recovery testing results, we anticipate being able to recover from a disaster within two to four hours. In the event that a disaster affects the operation of our current location, the employees of TAP will conduct business from their home offices. In addition, TAP has implemented back up storage facilities to facilitate business recovery.

In the event that business operations are affected, clients of TAP may reach an employee of the Firm by contacting Frederick Davis Terry, Jr. at 917.806.6135.

TAP maintains a Business Continuity Plan that provides a course of action for the assessment of a significant disruption to Firm business and for the continuation of Firm business following such an event. The Business Continuity Plan consists of firm-wide disaster recovery plans and includes a plan of coordination and communication in the event of a significant disruption to our business. During such an event, the plan would oversee the re-establishment and continuation of business processes pursuant to the Business Continuity Plan. The Business Continuity Plan establishes the evaluation of the disruption, instituting the appropriate plan of action, and coordinating recovery efforts.

The Business Continuity Plan is designed to address significant business disruptions of varying scope including, but not limited to:

- TAP-only business disruption.
- Disruption to TAP's main office in which business is conducted
- Disruption to a business district in which TAP business is conducted.
- City-wide business disruption.
- Regional disruption.

In each of these scenarios, TAP's Business Continuity Plan provides for an evaluation of the scope of the business disruption, and sets forth various plans of action and recovery facilities for the continuation of the Firm's business, as well as alternative means for the dissemination of information to employees and clients. The Business Continuity Plan serves as a guide that addresses how TAP will continue to conduct business during each of the above scenarios, to the extent that is possible pursuant to an evaluation.

It is TAP's intention to minimize the recovery time necessary to resume operations. Clients should be assured they will have prompt access to TAP through adequate back-up systems.

The Business Continuity Plan is subject to modification based on changing circumstances and assessment of need.

## **PRIVACY POLICY**

**TAP Advisors LLC and its affiliates (TAP Securities LLC, TAP Advisors LTD and TAP Securities LTD)—collectively and individually, “the Firm,” are subject to the law and regulation of various jurisdictions in which they are licensed or operate, including the General Data Protection Regulation (“GDPR”). The Firm has adopted global privacy policies which apply to all of its customers.**

### **What data privacy principles does the Firm adhere to?**

- The Firm will process all personal data in a lawfully, fair and transparent manner;
- The Firm will only collect personal data where it is necessary;
  - For the Firm to provide a service to you;
  - For you to provide a service to the Firm;
  - For the Firm to keep you informed of its products and services; or
  - For the Firm to comply with its legal and regulatory obligations.
- The personal data collected by the Firm will be adequate, relevant and limited to what is necessary in relation to the specific purpose for which your data will be processed;
- The Firm will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up-to-date;
- The Firm will maintain personal data in a form that permits identification no longer than is necessary for the purposes for which the personal data has been collected for processing and in accordance with the Firm’s record retention requirements as mandated by the Financial Industry Regulatory Authority, the Financial Conduct Authority or other relevant regulatory body;
- The Firm will hold and process personal data in a manner that ensures appropriate security;
- The Firm will only share personal data where it is necessary to provide the agreed service or where it is necessary for the Firm to comply with its legal and regulatory requirements.
- The Firm’s EEA-based entities will only utilise a service provider based outside of the EEA for the processing of personal data where this is strictly necessary to facilitate our services to you. Where required, we will ensure service providers are fully compliant with GDPR ahead of transferring any personal data.

### **What personal data does the Firm collect and why?**

In the course of providing products/services to you, the Firm may collect information that is considered personal information (e.g. name, contact details, address, passport number, driving license).

As a client, contact or employee of the Firm, we will require some personal information in order to verify your identity and have the applicable relationship with you. Some of this information may be required to satisfy legal obligations (e.g. to comply with obligations arising under the money laundering regulations whereas other information may be required in connection with the provision of services to you). The

information collected will vary depending on the service the Firm provides to you or you provide to the Firm, but typically includes:

- Personal information: Such as your name, date of birth, passport number or national insurance number;
- Contact information: Including your address, telephone number and email address.

### **Where does the Firm store my personal data?**

The Firm has comprehensive policies and procedures in place to ensure your personal data is kept safe and secure, with these including, but not limited to:

- Data encryption;
- Firewalls;
- Intrusion detection;
- 24/7 physical protection of the facilities where your data is stored;
- Background checks for personnel that access physical facilities; and
- Security procedures across all service operations.

### **How long does the Firm retain personal data?**

As required by its regulators, the Firm is required to maintain its books and records for a prescribed period. As such, information that falls in scope of either of these requirements is retained in line with the mandated timeframe. Any information that is outside the scope of this requirement will be retained while relevant and useful, and destroyed where this ceases to be the case or where the data subject specifically requests this.

### **What are my rights?**

Once you have provided your details to the Firm, you have certain rights which apply, depending on your relationship with the Firm, the information you have shared with us and the Firm's legal and regulatory obligations.

- You have the right to request a copy of the information that we hold about you. If you would like a copy of some, or all, of your personal information, please email the Firm at [info@tapadvisors.com](mailto:info@tapadvisors.com). The Firm will provide this information to you within one month (with the ability to extend this by an additional two months where necessary), free of charge.
- You have the right to request that the information the Firm holds about you is erased under certain circumstances including where there is no additional legal and/or regulatory requirement for the Firm to retain this information.
- As a client, you have the right to request that any information the Firm holds about you be provided to another company in a commonly used and machine-readable format, otherwise known as 'data portability'.

- You have the right to ensure that your personal information is accurate and up to date, or where necessary rectified. Where you feel that your personal data is incorrect or inaccurate and should therefore be updated, please contact [info@tapadvisors.com](mailto:info@tapadvisors.com).
  - You have the right to object to your information being processed, for example for direct marketing purposes.
  - You have the right to restrict the processing of your information, for example limiting the material that you receive or where your information is transferred.
  - You have the right to object to any decisions based on the automated processing of your personal data, including profiling.
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## **UK PRIVACY NOTICE**

TAP Advisors LTD and TAP Securities LTD (the “UK Firm”) are companies registered in England and Wales with company numbers 8689659 and 8715198. TAP Securities LTD is authorised and regulated by the Financial Conduct Authority (“FCA”) with Firm Reference Number 610167.

- For the purposes of the General Data Protection Regulation (‘GDPR’), the UK Firm will be the ‘controller’ of the personal data you provide. In most cases, data may be transferred to the US parent entity, TAP Advisors LLC, and will be subject to the same security and safeguards as are applicable to the UK Firm. Please read the following information carefully in order to understand the Firm’s practices in relation to the treatment of your personal data. Should you have any questions, please email us at [info@tapadvisors.com](mailto:info@tapadvisors.com)
- You have the right to lodge a complaint with the Information Commissioner’s Office (<https://ico.org.uk/concerns/>) if you are not happy with the way that we manage or process personal data.

## **How have I been categorised in accordance with GDPR?**

The GDPR requires the UK Firm to inform you of the legal basis on which we maintain your personal data. Typically, the UK Firm will reach out to you personally to confirm this; however, as a general rule the following is applicable:

- Clients – Information is maintained on the basis of contractual obligation and/or legitimate interests (where relevant);
  - Service providers – Information is maintained on the basis of contractual obligation; and
  - Database/marketing contacts – Information is maintained on the basis of legitimate interest.
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## **Will I be notified of changes to this policy?**

The Firm may, from time to time, review and update this policy. The Firm will maintain the latest version of this policy on its website, and where the changes are deemed material, it will make you are aware of these.

**To whom should I direct questions?**

If you have any questions, concerns or complaints about the practices contained within this document or how the Firm has handled your data, please email: [info@tapadvisors.com](mailto:info@tapadvisors.com). Alternatively, you may write to: TAP Advisors, 505 Park Avenue, 9th Floor • New York NY 10022.