



## CAPITA FINANCIAL NETWORK - DUE DILIGENCE QUESTIONNAIRE

LEGAL NAME OF FIRM:

WEB ADDRESS:

ADDRESS:

### BUSINESS PROFILE

1. What type of services do you provide? Describe the nature of your business.
  
  
  
  
  
  
  
  
  
  
2. Describe your business model, history, and experience.
  
  
  
  
  
  
  
  
  
  
3. Explain your asset structure. Do any clients represent more than 25% of your total assets?
  
  
  
  
  
  
  
  
  
  
4. How many employees do you have?
  
  
  
  
  
  
  
  
  
  
5. What countries do you operate in?
  
  
  
  
  
  
  
  
  
  
6. How many years have you been in business?
  
  
  
  
  
  
  
  
  
  
7. Do you plan to utilize other companies in the proposed engagement, including subsidiaries, affiliates, partnerships or joint ventures, or individuals other than your own employees to operate under the proposed agreement?  **YES** /  **NO**
  - i. If **YES**, identify the name and address of the company or individual you will use, explain your relationship with them and the actions they will implement.

Name/Address	Relationship	Activities

8. Do you have a code of ethics and/or anti-corruption code?  **YES** /  **NO**  
 i. If **YES**, please attach.
9. Identify your Compliance Officer, if applicable.

**OWNERSHIP AND KEY EMPLOYEES**

10. List the name and title of the owners of your company.

Name	Title

11. List any other key officers of the company.

Name	Title

12. List who will be primarily responsible for performing and supervising services under the proposed agreement.

Name	Title	Email

**RISK MANAGEMENT**

13. Do you have a risk management policy in place?  **YES** /  **NO**
14. Have you conducted a risk assessment in the past year?  **YES** /  **NO**
15. Are there physical controls, surveillance, and monitoring to detect unauthorized access?  **YES** /  **NO**
16. Do you conduct regular security awareness training for your employees?  **YES** /  **NO**
17. Describe your company's business insurance. Are you insured for general liability, cybersecurity and professional indemnity (e.g., E&O and D&O insurance)?
18. Do you have a business continuity plan or disaster recovery plan?  **YES** /  **NO**



- a) If **YES**, are all response procedures tested regularly?  **YES** /  **NO**
19. Does the organization have a documented protocol for notifying key stakeholders and customers in the event of a confirmed data breach or other security incident?  **YES** /  **NO**
- a) If **YES**, does this protocol ensure notification to Capita Financial Network occurs without unreasonable delay and no later than 72 hours after discovery of a confirmed security incident?  **YES** /  **NO**
20. Does your organization periodically test its incident response or breach notification procedures?  **YES** /  **NO**

### CYBERSECURITY RISKS, NETWORK, APPLICATION, & INFORMATION SECURITY

21. Do you have official cybersecurity policies and procedures in place?  **YES** /  **NO**
22. Do you have processes for risk mitigation and remediation?  **YES** /  **NO**
23. Do you have real-time networking monitoring to identify unauthorized access and breaches?  
 **YES** /  **NO**

### DATA PROTECTION AND PRIVACY

24. What data do you gather and save?
25. How is that data utilized?
26. Who has authorization to access third-party data?
27. How is confidential data maintained?
28. Who is responsible for maintaining and destroying confidential data?
29. Do you currently utilize programs with AI capabilities? If so, how does it touch our client data?  
Is the data protected?

