



## **Ever Green Wealth Management**

### **Disaster Recovery and Business Continuity Plan**

**Effective: July 30, 2019**

***This BCP is the property of Ever Green Wealth Management, LLC and its contents are confidential.***

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## **Revision History**

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The table below details changes made to the BCP.

| Date       | Revised By       | Approved By      | Details                |
|------------|------------------|------------------|------------------------|
| 05/30/2016 | Rebecca Gillette | Rebecca Gillette | Initial Draft          |
| 01/01/2019 | Rebecca Gillette | Rebecca Gillette | general review of Doc. |
| 07/31/2019 | Rebecca Gillette | Rebecca Gillette | Update for Website     |
|            |                  |                  |                        |
|            |                  |                  |                        |



## **Business Continuity Plan Scope and Objectives**

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Ever Green Wealth Management ("Ever Green WM") has adopted this Disaster Recovery and Business Contingency Plan ("BCP") to provide guidance to Ever Green WM employees and contractors (collectively "Ever Green WM employees") in the event of a business interruption.

The goal of the BCP is to provide recovery of critical business systems and information, and to provide a means of continued operations of critical business functions as soon as possible after the declaration of a business interruption.

Certain functions that are not deemed to be critical daily functions may become high priority functions due to the length and nature of the interruption. Ever Green WM will be responsible for the execution of the appropriate activities to provide for the resumption of operations of the functions within the time frames defined herein.

The responsibility for declaring a business interruption will be with the Chief Compliance Officer ("CCO") of Ever Green WM. The CCO will inform any Ever Green WM employees of the declaration of a business interruption and will authorize the implementation of the BCP elements that the CCO deems necessary.

The responsibility for declaring a business interruption will be with the Chief Compliance Officer ("CCO") of Ever Green WM. If applicable, the CCO will inform any Supervised Person[s] of the declaration of a business interruption and will authorize the implementation of the BCP elements that the CCO deems necessary.

The BCP is heavily dependent on the Advisor's access to its cloud-based systems and its critical vendors. These parties maintain their own separate business continuity plans and maintains highly available systems that are accessible from any location where an Internet connection is present.

In order to perform critical functions, the Advisor will need the ability to access the Internet to connect to mission critical systems, which include, but are not limited to:

- RedTail – Customer Relationship Manager, Document Management
- eMoneyAdvisors– Financial Planning, client documentation storage
- Hidden Levers – Risk Assessment
- Microsoft Office 365 Enterprise - client documentation storage

## **Business Contingency Policies**

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Ever Green WM has adopted the following policies that will be in effect during a declared business interruption:

- The primary goal of the BCP is to re-establish the highest priority functions of Ever Green WM as soon as possible after the event of a business interruption. The secondary goal will be the resumption of all other functions as the length of the interruption heightens their priority based on the operations analysis applicable to each business unit.
- It is the policy of Ever Green WM to convert vital paper based records into electronic form and maintain, as appropriate, electronic records on Ever Green WM systems (e.g. key contact information, portfolio history, transactional history, client agreements, etc.).
- Ever Green WM will make regular back-ups of electronic records and ensure that service providers servicing accounts maintain a level of acceptable service and recovery planning.
- All Ever Green WM employees shall maintain a current copy of the BCP Manual in their personal residence.
- In the event of a business interruption, the CCO of Ever Green WM will declare the emergency and contact Ever Green WM employees.
- Any emergency supplies, back-up sites and alternative worksites will be authorized by the CCO.
- Any required regulatory reporting disruption or potential rule violations that could possibly result from the business interruption will be immediately reported to the CCO and the affected function(s) will be immediately elevated to a critical business function.



## **Business Interruption Scenarios**

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There are numerous scenarios in which the BCP would be implemented, including a loss of access to the primary office, systems interruption, vendor outage, power outage, natural disaster, medical reasons, etc. As it is not practical to plan for every potential interruption, Ever Green WM will make every effort to maintain records required for critical business functions (See below) in a virtual, redundant location, such as a portable back-up drive or cloud-based storage.

Ever Green WM has also implemented the following short-term contingency plans in the event of an outage to telephones or Internet/Email.

If Ever Green WM Internet or email services are not functioning and the expected duration is 4 hours or less to restoration, Ever Green WM may opt to utilize the telephone or fax as an alternative means of conducting all necessary business activities. Should the expected duration exceed 4 hours, the CCO may decide to relocate to the alternate site.

If the office telephone and fax machine are not functioning and the expected duration is one business day or less, Ever Green WM may opt to utilize mobile phones and/or email to conduct business. Should the expected duration exceed one business day, the CCO shall assess the impact of continued use of alternate methods and determine the best course of action.

## **Critical Business Functions**

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The following critical business functions are addressed by this plan.

### **A. Day One Critical Business Functions**

Day One critical business functions are defined as activities that must be performed on a daily basis. Included are any processes that will result in financial, reputational, regulatory or operational risk.

1. Trading, Portfolio Management and Operations
  - a. Pre-trade research
  - b. Position reconciliation
  - c. Pre-trade Compliance review and approval
  - d. Trade execution
  - e. Trade confirm reconciliation
2. Client Service
  - a. Client Account access
  - b. Client contact information
  - c. Client Account restrictions
3. Systems
  - a. Access to Ever Green WM computer systems
  - b. Internet access for market data and access to core systems
  - c. Custodian and/or Sub-Adviser platform access
  - d. Systems back-up (online or portable back-up drive(s) with critical information)

### **4. Day Ten Critical Business Functions**

Day Ten critical business functions are defined as important and necessary functions that must be performed regularly, but if not performed for several days during a business interruption, they will NOT have a significant effect on the organization. Day Ten business functions include those that can be mitigated by applying additional financial and human resources to address the interruption and bring all systems and processes online.

1. Trading and Portfolio Management and Operations
  - a. Management and ad hoc reporting
  - b. Maintenance of Client files
  - c. A/P (Billing, etc.)
  - d. Delivery of disclosure statement (48 Hours)
  - e. Records retention and filing

- f. Performance reporting
- 2. Client Service
  - a. Client portfolio review
  - b. Management and ad hoc reporting
- 3. Systems
  - a. Regular System Maintenance
  - b. Vendor inquiries
  - c. Hardware/software testing
- 4. Executive and Compliance
  - a. Regulatory filings
  - b. E-mail monitoring
  - c. Marketing material creation/review
  - d. Compliance functions

### **C. Nonrecurring Critical Business Functions:**

Nonrecurring critical business functions are defined as critical activities that do not occur on a consistent basis but must be treated as a Day One critical function when applicable.

- 1. Trading and Portfolio Management and Operations
  - a. Trade error correction
  - b. Account terminations
- 2. Client Service
  - a. Client change request - financial condition or suitability

## **Alternate Work Site**

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### **Primary Site**

In the event that the office at 6543 Anthony Drive, Victor, NY 14564 is not accessible, Ever Green WM employees (as applicable) will work at another suitable location using their Internet access to securely connect to the Advisor's technology systems to provide Client services. The CCO will take into consideration the type of interruption, expected duration of interruption, weather/traffic conditions, staff location, as well as other factors that are to be determined when deciding to relocate to the alternate location.

## **Critical Contact Information**

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The Principal of Ever Green WM maintains critical contact information for its Clients and critical vendors in RedTail, eMoney, Hidden Levers and Microsoft Office 365. These systems are accessible from any secure internet access point and their mobile phone.

## **Data Backup and Restoration**

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Ever Green WM has implemented the following procedures to ensure the availability of critical data in the event of a business interruption where data must be replicated or restored.

- Ever Green WM shall make complete backups (at least weekly) of its computer systems utilizing Microsoft Office 365 Dynamic E3, a cloud based platform.
- Ever Green WM shall make additional, interim backups of critical data, as appropriate.

## **Protection and Privacy of Critical Data**

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Ever Green WM has implemented the following procedures to ensure the protection and privacy of critical data on backup storage devices and laptop computers.

- Ever Green WM shall maintain password protection on external storage devices to prevent unauthorized use.



- Ever Green WM shall store the external storage devices in a reasonably safe place when not in use for backup and restoration purposes.
- Ever Green WM shall password protect laptop computers and ensure all electronic and filing systems containing Client personally identifiable information ("PII") is maintained appropriately in accordance with Ever Green WM Privacy Policy.
- Ever Green WM shall maintain a Restricted Information Log to document and ensure proper treatment of any sensitive information shared in a business contingency situation, including, but not limited, to Client information, systems security and Ever Green WM financial information. (See below).

### **Restricted Information Log**

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During a business contingency situation, Ever Green WM has provided the following sensitive information to those outside of Ever Green WM will make every reasonable effort to ensure protection and privacy, resulting from this necessary sharing of information. The CCO shall make the formal determination as to whether any information is to be shared outside of Ever Green WM, and what will be the Protective Activity taken (password change, confirmation of document destruction, etc).

| Date | Provided To | Details | Protective Activity |
|------|-------------|---------|---------------------|
|      |             |         |                     |
|      |             |         |                     |
|      |             |         |                     |

### **Testing of the BCP**

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Ever Green WM shall review this plan and test its effectiveness at least annually. The CCO or delegate shall document the findings of the testing in a memorandum to be placed in the Compliance files.

Annually, Ever Green WM shall also request information from its vendors to ensure they maintain a reasonably adequate contingency plan to support the activities of Ever Green WM. Any deficiencies will be addressed with the service provider and documented in a memorandum to be placed in the Compliance files and/or the annual CCO report of the effectiveness of the Compliance Program.

### **Updates and Revisions to the BCP**

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Ever Green WM may make periodic updates to this BCP to account for changes in business practices, regulations and best practices. If any material changes are made to the BCP, all Ever Green WM employees (if applicable) shall receive a copy and be expected to certify their understanding of the plan within 30 days of receipt.