

**Greenwich Wealth Management, LLC  
Investment Adviser**

**Disaster Recovery Policy**

## **DISASTER RECOVERY**

### **Policy**

As part of its fiduciary duty to its clients and as a matter of best business practices, Greenwich Wealth Management, LLC, has adopted policies and procedures for disaster recovery and for continuing Greenwich Wealth Management, LLC's business in the event of an emergency or a disaster. These policies are designed to allow Greenwich Wealth Management, LLC to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Greenwich Wealth Management, LLC might reasonably face given its business and location.

### **Background**

Since the terrorist activities of 9/11/2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of an emergency or disaster, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

### **Responsibility**

Daniel J. Sullivan is the designated officer responsible for maintaining and implementing Greenwich Wealth Management, LLC's Disaster Recovery and Business Continuity Plan.

### **Procedure**

In the event of any kind of disaster or event that may disable the firm or prevent access to our office, Greenwich Wealth Management, LLC has a Business Continuity Plan (BCP), which can be referred to in the Business Continuity Disclosure Statement.

## **Greenwich Wealth Management, LLC Business Continuity Disclosure Statement**

Greenwich Wealth Management, LLC has a Business Continuity Plan (BCP) in place to prepare for the possibility of a future significant business disruption (SBD). An SBD may range in severity from a firm only disruption, such as a fire or a power outage, to a regional disruption, such as a natural disaster or a terrorist attack.

Greenwich Wealth Management, LLC has a Business Continuity Plan in place to prepare for the possibility of a future Significant Business Disruption. A Significant Business Disruption may range in severity from a firm only disruption, such as a fire or a power outage, to a regional disruption such as a natural disaster or a terrorist attack.

In the event of a firm only disruption, Greenwich Wealth Management, LLC has a functional offsite facility locally providing an alternative location from which we can reasonably operate under such a Significant Business Disruption. This facility contains duplicate equipment and telecommunication services, and space for staff to perform critical business functions. Greenwich Wealth Management, LLC expects to be able to resume business within one (1) hour of this type of event.

### **OFFICE LOCATIONS**

#### **Home Office Locations**

Mission critical systems that take place at the home office are order taking and order entry. Our employees may travel to the office by means of foot, car, bus or train.

**Address:** 45 East Putnam Avenue  
Suite 109  
Greenwich, CT 06830  
**Main Phone:** (203) 618-0100

## **Alternative Physical Location**

In the event of an internal Significant Business Disruption, we will move our staff to the following location:

**Address:** 6 Indian Knoll Place  
Greenwich, CT 06831  
**Phone(s):** (203) 625-9323  
(203) 273-0801  
**Fax:** (203) 286-2035

Alternate Location in the event that power is out in Greenwich, CT:

**Address:** 97 Blue Ridge Road  
Wilton, CT 06897  
**Main Phone:** (203) 762-7757  
(203) 940-1581

In the event of a city-wide or regional Significant Business Disruption we will move our staff to:

Saxony Securities  
86 Kenrick Plaza  
St. Louis, MO 63119  
**Main Phone:** (314) 963-9336

Mark Thompson, Saxony Securities, has our pertinent contact information. Mark will handle calls for two (2) business days. This would allow for two (2) days travel time.

## **CUSTOMER ACCESS TO FUNDS AND SECURITIES**

Our firm does not maintain custody of customers' funds or securities. Client accounts are custodied and maintained at Interactive Brokers LLC. Customers may access their funds and securities online at: [www.InteractiveBrokers.com](http://www.InteractiveBrokers.com), or by contacting:

Interactive Brokers, LLC  
One Pickwick Plaza  
Greenwich, CT 06830  
**Main Phone:** (203) 618-5800  
**Toll Free:** (866) 694-2757