
Independent Financial Partners Business Continuity/Disaster Recovery Plan (BCP/DRP)

INDEPENDENT [FINANCIAL] PARTNERS



Table of Contents

I.	EMERGENCY CONTACT PERSONS	3
II.	FIRM POLICY	3
A.	SIGNIFICANT BUSINESS DISRUPTIONS (SBDs).....	3
B.	APPROVAL AND EXECUTION AUTHORITY	3
C.	PLAN LOCATION AND ACCESS.....	3
III.	BUSINESS DESCRIPTION	4
IV.	OFFICE LOCATIONS	4
V.	ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES	4
VI.	CUSTOMERS’ ACCESS TO FUNDS AND SECURITIES	4
VII.	DATA BACK-UP AND RECOVERY (ELECTRONIC)	4
VIII.	FINANCIAL AND OPERATIONAL ASSESSMENTS	5
A.	OPERATIONAL RISK.....	5
B.	FINANCIAL AND CREDIT RISK	5
IX.	MISSION CRITICAL SYSTEMS	5
	OUR LOCATION’S MISSION CRITICAL SYSTEMS	5
	<i>Order Taking</i>	5
	<i>Order Entry</i>	5
	<i>Order Execution</i>	6
	<i>Other Services Currently Provided to Customers</i>	6
X.	ALTERNATIVE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES AND REGULATORS	6
A.	CUSTOMERS	6
B.	EMPLOYEES.....	6
C.	REGULATORS	7
XI.	CRITICAL BUSINESS CONSTITUENTS AND BANKS	7
A.	BUSINESS CONSTITUENTS.....	7
B.	BANKS.....	7
XII.	REGULATORY REPORTING	7
XIII.	DISCLOSURE OF BUSINESS CONTINUITY PLAN	8
XIV.	UPDATES AND ANNUAL REVIEW	8
XV.	SENIOR MANAGER APPROVAL	8



Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Chris Hamm, Chief Operating Officer (COO), 813-314-2379, chris.hamm@ifpartners.com and Keith Kessel, Chief Compliance Officer (CCO), 813-387-6866, keith.kessel@ifpartners.com. These names will be updated in the event of a material change, and our COO will review them within 17 business days of the end of each quarter.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting our firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business; we will direct our financial professionals to [IFP's Advisor Service Overview](#) for contact information relating to accessing their clients funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our location's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of locations, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of clearing firm, Pershing, LLC.

B. Approval and Execution Authority

The COO is responsible for approving the plan and for reviewing it annually. The COO and CCO have the authority to execute this BCP.

C. Plan Location and Access

Our location will maintain copies of its BCP plan, annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located in "Box", which is the Firms' electronic filing system.



III. Business Description

Our office location conducts business in equity and fixed income securities as well as mutual funds, variable annuities and variable life. Our firm is an introducing firm and does not perform clearing functions for itself or others.

IV. Office Locations

Our Firm has one office, located at 3030 North Rocky Point Dr. W #700. Tampa, FL 33607, The main contact number for IFP is: 813-341-0960

V. Alternative Physical Location(s) of Employees

In the event of an SBD that prevents employees from conducting business from our Tampa Corporate Office or other Tampa locations, we will move our core staff from the affected office to 800 Magnolia Ave. Ste. 1825, Orlando, FL 32803. IFP's business critical employees maintain the ability to work remotely and in the event the Orlando location is not a viable option, IFP Senior Management will assess and relocate core staff to the safest and most practical location. This may include other advisory offices that IFP has throughout the United States.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. All client assets are held at our clearing firm Pershing, LLC or held directly at other firms, including but not limited to mutual fund companies and insurance companies.

VII. Data Back-Up and Recovery (Electronic)

Our headquarters maintains its primary books and records at:
3030 North Rocky Point Dr. W., Suite 700
Tampa, FL 33607

Our headquarters maintains its primary electronic records via "Box" application.

Document types and forms that are backed up are: All required regulatory files.

In the event of an internal or external SBD causing loss of electronic records, we will either recover the storage media or electronically recover data from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.



VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counterparties and regulators. Additionally, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Electronic).

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments (and other assets) to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact custodial broker-dealers, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

IX. Mission Critical Systems

“Mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry and execution. IFP’s custodial broker dealers provide the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our Location’s Mission Critical Systems

Order Taking

Currently, we receive orders from customers via telephone, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us.

Order Entry

Currently, we enter orders by recording them electronically and sending them to the custodial broker dealers electronically through respective trading platforms or telephonically.



In the event of an internal SBD, we will enter and send records to the custodial broker dealers by the fastest alternative means available, which include telephone or trading platform. In addition, during an internal SBD, we may need to refer our customers to deal directly with the custodial broker dealers for order entry. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the custodial broker dealers by the fastest means available when operations resume.

Order Execution

The custodial broker dealers execute orders on our behalf.

Other Services Currently Provided to Customers

In addition to those services listed above in this section, we also provide surveillance, supervision, and financial professional support. In the event of an internal or external SBD, we would continue to provide these services offsite of the headquarters location via laptop computers, cell phones, and electronic files remotely accessible.

X. Alternative Communications Between the Firm and Customers, Employees and Regulators

A. Customers

We now communicate with our customers using the telephone, email, our website, intranet, fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

B. Employees

We now communicate with our employees using telephone, email, intranet and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a “call tree” (see Exhibit 1. Internal SBD Call List) so that senior management can reach all employees quickly during an SBD. The call tree includes all staff phone numbers and the person to invoke use of the call tree is William Hamm.



C. Regulators

We communicate with our regulators using telephone, email, fax, U.S. mail and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XI. Critical Business Constituents and Banks

A. Business constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services.

IFP’s custodial broker dealers provide most of our critical services. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our firm.

Our other critical business constituents are:

Business Constituent	Services Provided:	Alternatives in the event they are unavailable:
Windstream	Re-route phone and internet	N/A nationwide locations

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide financing needed in the event of an internal or external SBD. The banks maintaining our operating accounts are Wells Fargo Bank, 420 Montgomery St. San Francisco, CA 94101, 800-289-3557 and Synovus Bank, 4488 W. Boy Scout Blvd, Tampa FL 33607, 813-289-0267.

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from other sources.

XII. Regulatory Reporting

We are subject to regulation by FINRA and various State Financial Regulatory Division in which we conduct business. We now file reports with our regulators via the Internet. In the event of an SBD, we will check with FINRA and other regulators to determine which means of filing are still available to us and act in the means closest in speed and form (written or oral) to our previous filing method. In the event we cannot contact our regulators, we will attempt to file required reports using the communication means available to us.



XIII. Disclosure of Business Continuity Plan

Will be sent upon request.

XIV. Updates and Annual Review

We will update this plan whenever we have material changes to our operations, structure, business or location. Additionally, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or location.

XV. Senior Manager Approval

I have approved this Disaster Recovery Plan as reasonably designed to enable our location to meet its obligations to customers in the event of an SBD.

Signed: _____

Name: _____

Title: _____

Date: _____



Disaster Recovery Plan

Background

Since disasters and disruptions are unpredictable, IFP retains the flexibility to respond to actual events as they occur. It is IFP's plan to quickly recover and resume business operations after a business disruption and respond by safeguarding employees' lives and firm property, protecting the firm's books and records, and allowing our advisors to transact business. In summary, our plan is designed to permit our firm to resume operations as quickly as possible, give the scope and severity of the significant business disruption.

Policies and Procedures

Independent Financial Partners' ("IFP") Disaster Recovery Plan is an essential part of its operations. All employees are responsible for understanding their role in the event of a disaster or major disruption. The COO has the overall responsibility for the firm's response to a major disruption, is responsible for ensuring that IFP's Disaster Recovery Plan is tested annually and is updated when regulatory or operational changes occur. The COO may designate one or more persons to assist with their duties.

A disaster is any event that renders IFP and its' associated Financial Professional's unable to provide its usual level of service without immediate recovery (a "major disruption").

If the major disruption does not affect the physical location of the business, meaning the business can continue to operate from that location, the COO, or designee, will determine the steps necessary to resolve the disruption. In the event the disruption does not prevent employees from working remotely, employees may be required to use these systems and/or to travel to the designated off-site location as named below as deemed necessary. The below list is not exhaustive. Specifically, if the location listed below is not available, staff may be asked to work remotely from alternate locations.

If the major disruption affects the physical location of the business and employees either cannot get into the building or must evacuate the building, the COO will determine the steps necessary to resolve the service disruption. This may include contacting IFP's offsite data storage provider and email retention provider. The COO and/or designee will notify all critical employees of next steps and provide direction to each employee as to whether or not they will be required to report to the designated offsite location.

In the event of an office building evacuation, all employees should immediately leave the building. Go immediately to 7627 W Courtney Campbell Causeway, Tampa FL (the Westin Hotel Parking Lot), our designated meeting location, so that the COO may confirm everyone is safe and accounted for.



If a building evacuation occurs and an employee is on the phone, the employee should inform the caller that the building is under mandatory evacuation, you'll have to reschedule the call for another time, and immediately terminate the call.

Because every building and situation has unique characteristics and circumstances, below are some general guidelines to follow for building evacuation:

1. Do NOT use the elevators.
2. Make yourself aware of the closest exit and go to it.
3. Instruct others in your area to also leave the building.
4. Sound any alarms, e.g. fire alarms, if needed.
5. Proceed to the designated meeting location.

Main Office Number

Main office number: 813-341-0960. Key employees may be contacted directly, via phone or email, if necessary and possible.

Notification of Proper Authorities

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

Telephone Service/Fax

In the event IFP's primary telephone line is disrupted, phone and fax lines will be forwarded via Windstream to the extent available.

Temporary Operation Location/Recovery Site

If the primary office is inaccessible, IFP will temporarily relocate to a location determined by the COO ([Noted in the Business Continuity Plan](#))

Client data is easily accessible at any remote location with Internet access. Client data, including e-mail correspondence and pertinent books and records, is backed up and archived daily. The archive is maintained away from IFPs' primary business location to allow for retrieval of client records where the primary office location is not accessible.

Equipment/Hardware

IFP will maintain a list of all equipment, hardware, and software used by IFP employees. The list shall provide identifying information for the item, including the serial number, the manufacturers and serial/registration number as applicable. The COO will notify IFPs' insurance company of any damage.



Mail Service

If IFP is unable to receive mail at its business office, IFP will either forward mail to an alternate location or submit a mail hold request to the post office.

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 electronically (BOX), for the appropriate time that is required by law. Via BOX, this information can be accessed from anywhere.

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, gif, with a vetted cloud provider, 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 certain client records are also maintained by the custodian(s) holding the client's assets. IFP can access client records from the custodian as needed. If a client needs immediate access to their account, and for any reason cannot contact the Company or access via their client portal, the client could contact his or her [custodian\(s\)](#) directly.

Client Contact

Typically, IFP is not in direct contact with clients. Therefore, if a disaster occurs that requires client contact, every effort will be made by IFP or an IFP Financial Professional to contact clients. This may be done by phone calls, emails, general mailing, posting a message on IFP's website, or by other means.

Financial Data

Financial information is stored in a cloud-based file that is included in the backup procedures discussed above.

Updates and Annual Review

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



Contacting Employees

When a disruption occurs, the COO will determine when to enact IFP's calling tree process. The COO will contact each Executive Officer. The Executive Officer will be responsible for calling their designated call recipients.

Each Executive Officer is responsible for retaining an accessible copy of the most current call tree list at a location other than IFP's primary business office.



IFP 2020 Business Continuity Plan/Disaster Recovery Plan (BCP/DRP)

Caller	Call Recipients
Chris Hamm, COO	William Hamm, Karen Hamm, Jeff Acheson, Keith Kessel, Aaron Gilman, Jakub Novak, Evan Renz, Fernando Fussa, Michelle Peatee, Jacob Hurley, Dan Burgess, Chris LaSalle
William Hamm	Dan Overbey
Keith Kessel	Kevin Nashbar, Gary Husel, Danny Miller, Bill Lane, Jennifer Cornett, Rick Nummi
Fernando Fussa	Ken Nguyen, Marc Flecha, Renee Holsombach, Bobby Semprini, Alexis Balsamo, Tina Baker, Tara Lambeth
Jakub Novak	Abby Bohatch, Austin O'Connell, Tim Nguyen, Rachel Tate, Karen Houser, Luz Ciprian, Khala Watson, Alisa Knafelc
Jeff Acheson	Rich Richmond
Aaron Gilman	Peter Nunley, Greg Wozniak, Jake Muehlschlegel
Pete Nunley	Hessum Zanghenepour, Rob Olsen, Luis Villavicencio
Michelle Peatee	Scott McCreedy, Zoe Holmquist (contractor)
Jacob Hurley	Aaron Prida
Evan Renz	Daniel Ragbeer, Saransh Singh, Austin Jerome

Notes:

Interns and/or temps will be contacted by their assigned Manager as applicable.
The call tree will be reviewed quarterly and updated as needed.