

Abraham & Co., Inc.

Privacy Policy & Business Continuity Plan

2019

At Abraham & Co., Inc. (*Abeco*), we are committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.

How We Protect Confidentiality. *Abeco* uses procedural, physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities. When we enter into agreements with other companies to provide services to us or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose - to benefit you.

Persons Covered by the Privacy Policy. The *Abeco Privacy Policy* applies to anyone who is a current or former *Abeco* brokerage or investment advisory client. We provide you with a copy of this policy when you open an account, and we send you annual notifications thereafter. If we change our policy regarding the sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

How We Obtain Information About You. In the normal course of business, we collect, retain and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including: applications and other forms you file with us (e.g., name, assets, income), records of transactions with us, non-affiliated third parties and others (e.g., credit report). Because we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your financial advisor or *Abeco* directly at: (253) 851-7486 or by email at: invest@abrahamco.com if you need to correct or update your personal information.

Sharing Information - With Whom and Why. *Abeco* does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices. We do not disclose your personal information to non-affiliated third parties, unless one of the following exceptions applies: (1) We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). An example would be our custodian, TD Ameritrade Institutional, which prints and mails your account statement. (2) We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with federal and state securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations, authenticate Client identity, and source of funds.

Internet Security. We do not retrieve account or personal information from visitors who browse the public areas of our website. Clients who have the ability to access their accounts online are required to log on to our secure websites with their user name and individually selected password. Your password is known solely to you and should never be shared with anyone. Each time you access your account please log off when you are finished. This will prevent someone else from accessing your account if you leave your computer unattended. *Abeco* advisors and employees use information about you to respond to your needs and to provide you with information about specific products in which you may have an interest. We instruct our employees to use strict standards of care in handling the personal, confidential information of customers and remind them on a regular basis of their obligations with regard to the confidentiality of customer information.

Option to Opt Out and Change Notices. If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt out of such disclosure. For your reference,

this Privacy Policy has been posted at www.abrahamco.com. If you have questions or concerns, please contact us via email at invest@abrahamco.com.

Summary of Business Continuity Plan

Abraham & Co. has developed a detailed “Business Continuity Plan” which describes how we will respond to events that significantly disrupt our business. Since the timing and severity of disasters and disruptions is unpredictable, we expect to respond in a situationally-applicable manner to the best of our ability. The following is a summary of our plan: If, after a significant business disruption, you cannot contact us at our main email: invest@abrahamco.com or our main office number: (253) 851-7486, you should attempt to email us at: abeco@comcast.net. In the event our email or phone systems are down and you can not reach us directly you should contact the custodian at which your assets are held at: TD Ameritrade Institutional (800) 934-6124 or the *Contact Us* page containing TDA’s Business Continuity Plan and follow instructions on how they may execute orders on your behalf, distribute funds from your brokerage account, provide current account balances and information and or answer general questions about your brokerage account. <https://www.tdainstitutional.com/contact-us.html>

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. Our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

TD Ameritrade Institutional also backs up our important client records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our custodial firm that its objective is to restore its own operation and be able to complete existing transactions and accept new transactions and payments within 24 hours your orders and requests for funds and securities could be delayed during this period. Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 7 business days. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 10 business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site www.abrahamco.com or our customer emergency numbers on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

For More Information If you have questions about our business continuity planning, you can contact us at (253) 851-7486 or email us at: invest@abrahamco.com