

**Davidson Securities**  
**Business Continuity Plan (BCP)**

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**I. Introduction**

These pages document the Business Continuity Plan (BCP) for Davidson Securities . The purpose of this BCP is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption.

**II. Emergency Contact Persons**

Our firm's two emergency contact persons are Jon Davidson, cell phone (315) 655-3027, email [jonny.d@mac.com](mailto:jonny.d@mac.com) , and Meg Eaton, cell phone 607 768-3055, email [meaton@cadaretgrant.com](mailto:meaton@cadaretgrant.com). These names will be updated in the event of a material change.

**III. Firm Policy**

Davidson Securities' policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of 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 at this, or our alternate office location within 24 hours, we will direct our customers to the following for questions and status updates: Cadaret, Grant & Co. Inc., 100 Madison St., Suite 1300, Syracuse, NY, 13202, (800) 288-8601 or (315) 471-2191. If Davidson Securities' or Cadaret Grant personnel are unreachable, brokerage clients may contact Pershing LLC (201) 413-3635 for emergency assistance and to access client funds. Davidson Securities' also maintains relationships with third parties which custody assets elsewhere such as an investment company, insurance carrier, trust company or other direct issuer. Clients can contact these companies directly to obtain access to investment and/or insurance account(s). Client statements will help determine the location and contact information for each investment.

**A. Significant Business Disruptions (SBDs)**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our office's ability to communicate and do business, such as a communications failure or a fire in our building. External SBDs prevent the operation of the securities markets or a number of branches, such as a terrorist attack 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 Cadaret Grant and Pershing LLC.

**B. Approval and Execution Authority**

Jon Davidson is responsible for approving this plan and for reviewing it in the registered location annually and with employees of the registered location. Jon Davidson has the authority to execute this BCP.

**C. Plan Location and Access**

Davidson Securities' will maintain copies of its BCP plan and review changes that have been made to it. An electronic copy of our plan is located on the Davidson Securities web site :

<http://davidsonsecurities.com/Continuity.pdf>

#### **IV. Business Description**

Jon Davidson and Davidson Securities' primarily conduct securities and insurance business on behalf of clients, their businesses, and their families.

Cadaret Grant is our affiliated broker-dealer and performs many back-office and support related functions. All transactions are sent to Pershing LLC (the clearing firm for Cadaret), which executes our orders, compares them, allocates them, clears, and settles them. Pershing LLC also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities Davidson Securities also maintains relationships with third parties which custody assets elsewhere such as an investment company, insurance carrier, trust company or other direct issuer.

Cadaret, Grant & Co., Inc., is located at: 100 Madison St., Suite 1300, Syracuse NY 13202 and can be reached by phone at (800) 288-8601 or (315) 471-2191.

Pershing LLC is located at: One Pershing Plaza, Jersey City, NJ 07399 and can be reached by phone at (201)413-3635.

#### **V. Office Location:**

Our office location is:  
2076 Rippleton Cross Rd  
Cazenovia, NY 13035  
B: (315) 655-9482

Executive name and Davidson Securities' primarily conduct securities and insurance business on behalf of clients, their businesses, and their families. Jon Davidson and Davidson Securities do not custody client assets and any client funds received at this location are forwarded to the appropriate investment/sponsor destination within 24 hours.

#### **VI. Alternative Physical Location(s) of Employees**

In the event of an SBD that effects our office location, our staff will relocate to 4003 Booth Place, Sarasota, FL 34231. If our alternate location is also affected by the SBD we will make best efforts to secure workspace that has not been impacted by the SBD within 24 hours.

#### **VII. Customers' Access to Funds and Securities**

Pershing LLC maintains our customers' brokerage accounts, can grant customers access to them, and delivers funds and securities.

Pershing LLC is located at: One Pershing Plaza, Jersey City, NJ 07399 and can be reached by phone at (201)413-3635.

Davidson Securities also maintains relationships with third parties which custody assets elsewhere such as an investment company, insurance carrier, trust company or other direct issuer. Clients can contact these companies directly to obtain access to investment and/or insurance account(s). Clients' statements will help determine the location and contact information for each investment.

#### **VIII. Data Back-Up and Recovery (Hard Copy and Electronic)**

Davidson Securities' maintains its primary hard copy books and records at:  
2076 Rippleton Cross Road  
Cazenovia, NY 13035

Davidson Securities' subscribes to the services of NetX360, which is the Pershing platform for maintaining brokerage client data.

Davidson Securities' maintains its primary electronic backup disks/hard drives at:  
2076 Rippleton Cross Road  
Cazenovia, NY 13035

Davidson Securities' maintains its primary web-based electronic backup records with the following service:  
Dropbox Inc.

Jon Davidson is responsible for the maintenance of all hard copy and electronic format books and records.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our backup or electronic copies. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

**IX. Alternate Communications Between and Customers**

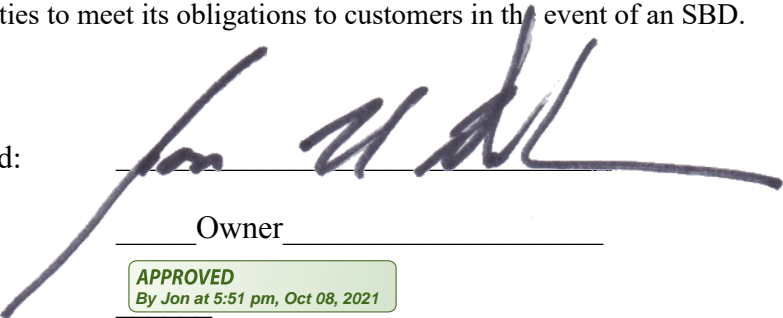
Davidson Securities now communicates with our customers using the telephone, e-mail, our website, fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and 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 e-mail 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.

**X. Updates and Annual Review**

Davidson Securities will update this plan whenever we have a material change to our operations, structure, business or location or to those of Cadaret, Grant & Co. Inc. or Pershing. In addition, Davidson Securities will review this BCP annually to assess potential modification requirements.

**XI. Approval**

I, Jon Davidson, has approved this Business Continuity Plan as reasonably designed to enable Davidson Securities to meet its obligations to customers in the event of an SBD.

Signed:   
Title: Owner  
Date: 