

## **SUMMARY OF FIRM BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN**

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### **BACKGROUND**

In light of the Firm's fiduciary duties to its clients and expectations of its clients, the Firm has established a process for responding to emergencies, contingencies and disasters.

### **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 all of the Firm's books and records, and allowing our clients to transact business. In the event that we determine we are unable to continue our business, we will assure clients prompt access to their funds and securities.

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our Firm's ability to communicate and do business, such as a fire in our building or the death of a key member of the Firm. External SBDs prevent the operation of the securities markets such as a terrorist attack, flooding and/or earthquakes, pandemics or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, such as the brokerage/custodian firm(s) we use.

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### **DATA BACK-UP AND RECOVERY**

The Firm maintains its books and records with Apple iCloud (Run by Apple Inc.) ("Apple iCloud"), a that provides on-demand cloud computing platforms and APIs. The Firm's custodial records such as ledgers, blotters, statements, confirms, etc. are kept at our custodian within their cloud computing platform.

The Firm backs up its electronic records to a cloud disaster recovery environment. In the event of an internal or external SBD that causes the loss of our electronic records, we will recover the data electronically from our cloud disaster recovery environment.

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### **OPERATIONAL ASSESSMENTS**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include telephone voice mail, secure e-mail, website postings, push notifications, social media posts, etc.

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### **MISSION CRITICAL SYSTEMS**

Our Firm's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include various software that host our sophisticated algorithms.

We have primary responsibility for establishing and maintaining our business relationships with our clients. Our custodian provides the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our custodian contract provides that our custodian will maintain a business continuity plan and the capacity to execute that plan.

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## TRADING

Currently, when a client chooses to trade in one of our various investment strategies, the trade will route through our custodian. Our custodian will execute, clear, settle and custody all traded U.S. listed securities. In the event of an internal SBD, we will rely on our custodian to resume operations as quickly as possible depending on the scope and severity of the SBD.

In the event of an external SBD, we will maintain the order in electronic format and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our clients to deal directly with our custodian.

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## CLIENT ACCOUNT INFORMATION

We currently access client account information via our API, via our custodian. In the event of an internal SBD we would access client information via the custodian's website.

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## ALTERNATE COMMUNICATIONS WITH CLIENTS, EMPLOYEES AND REGULATORS

### *Clients*

In the event of an SBD, we will assess which means of communication are 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 our clients. Communications will be limited to technology issues, lost passwords, etc., as the Firm relies on the internet advisor exemption under SEC Rule 203A-2(e). Due to the nature of the internet adviser model, the Firm is limited in its capacity to interact with its clients. Such limitations are disclosed to the client in the investment advisory agreement that is electronically accepted and executed at account inception.

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## REGULATORY REPORTING

Our Firm is subject to regulation by the SEC. In the event of an SBD, we will check with the SEC and/or other relevant regulators to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to our previous filing method.

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## THIRD-PARTY SERVICE PROVIDERS

The Firm will evaluate on a case-by-case basis the types of persons who may have access to the Firm's computer systems, cloud-based services, custodian systems, etc., and determine how to reasonably ensure that their access to our systems would not result in access to confidential information.

Before retaining a third-party service provider, the Firm's CCO will conduct reasonable due diligence by reviewing the third-party service provider's information security policy, service level agreement, or other applicable agreement or contract.

After selecting a third-party service provider, the Firm's CCO will monitor and review the performance of the third-party service provider to reasonably ensure that the provider is applying protective security measures that comply with the Firm's BCP.

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#### KEY PERSONNEL AND CONTINUITY OF OPERATIONS

The following personnel are identified as "Key Personnel" due to their critical roles in the management and oversight of the Firm's operations:

Carlos Ernesto Calderon Rangel, Sr.

Jessica Hernandez

Although these individuals are integral to the Firm's leadership and client service functions, the Firm's operational continuity is not solely dependent on their presence. In the event that one Key Personnel becomes unable to perform their duties due to death, incapacitation, or an extended period of unavailability, the remaining Key Personnel shall assume full responsibility for the Firm's operations.

Should both Key Personnel become unable to lead the Firm, appropriate steps will be taken to ensure an orderly transition of the Firm's operations and continued client service. Further, the Firm's Investor Relations personnel will assist with notifying clients and providing them with relevant information, including custodian contact details, to ensure uninterrupted access to their accounts.

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#### TESTING

The BCP is periodically tested to ensure successful recovery. The Firm's BCP testing will occur not less than annually. The CCO will ensure that the compliance records contain (i) a written report of any tests conducted on disaster recovery procedures, and (ii) documentation of any plan amendments or changes to address the findings of such testing.

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#### EMERGENCY CONTACT INFORMATION

As part of the Firm's Business Continuity Plan, the following individuals serve as primary points of contact in the event of a business disruption or emergency: The Firm's two emergency contact persons are:

Charly Calderon  
[ccalderon@arcsacapital.com](mailto:ccalderon@arcsacapital.com)

Jessica Hernandez  
[Jessica.hernandez@arcsacapital.com](mailto:Jessica.hernandez@arcsacapital.com)