



Incident Response Summary

How we respond if your information is ever affected · October 2026

If a security incident ever affects your firm's information, you will hear from us quickly and with the facts you need. This summary describes our written Incident Response Plan. The full plan is available to clients on request.

1. Identify	2. Contain	3. Assess	4. Notify	5. Recover	6. Review
Log the time we became aware; preserve evidence	Stop further access within hours	Determine what data and clients are affected	Notify you within 72 hours	Restore secure operations	Lessons learned within 30 days

A written, tested plan

Our Incident Response Plan is part of our Written Information Security Program. We test it at least annually by walking through a realistic scenario, and review it with the program.

What our notice includes

What happened and when, the types of information involved (including whether customer NPI or SAR material was affected), the customers affected if known, the steps we have taken, and a contact for questions. We send updates as facts develop.

Vendor incidents covered

If one of our service providers reports an incident that may affect your data, we treat it as our own incident, including the 72-hour notice to you.

72-hour notice to you

If a breach involves your information or a system we maintain, we notify your designated contact by phone and email as soon as possible, and no later than 72 hours after becoming aware of it. This commitment is in our engagement letter.

Support for your obligations

Your customers' information belongs to your firm, and we give you what you need for your own customer and regulatory notices. If SAR material is involved, we tell you immediately so you can address SAR confidentiality.

Records and lessons learned

Every incident, including false alarms, is logged with supporting evidence and kept for 6 years. After any breach we complete a written review within 30 days and update our safeguards.

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