



Partnervest Financial Group LLC
A Financial Services Partnering Company

Business Continuity Plan

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Table of Contents

OVERVIEW	3
I. TYPES OF SIGNIFICANT BUSINESS DISRUPTIONS (“SBD”)	3
A. LIMITED SBD	3
B. LOCAL SBD	3
C. LARGE SBD	3
II. DECLARATION OF SBD	3
III. RESPONSE TO DECLARATION OF SBD	5
A. OBTAIN AND REVIEW A COPY OF SBD PLAN	5
B. IMPLEMENT THE CALLING TREE	5
C. FOLLOW THESE PROCEDURES ONCE SBD DECLARED	6
IV. UPDATING THIS PLAN	13
V. SENIOR MANAGER APPROVAL	14
ATTACHMENT A: List of Custodians and Their Contact Information	15
ATTACHMENT B: Emergency Contacts for Key Personnel	16
ATTACHMENT C: Advisor/Representative Calling Tree	17
ATTACHMENT D: Evacuation Check List	23
A. Items for Evacuation	23
B. Floor Plan Layout 1216 State Street, 3 rd Floor	24
ATTACHMENT E: Test Plan for the Business Continuity Plan	25
A. Purpose	25
B. Types of Tests	25
C. Planned Tests	25

OVERVIEW

The business continuity plan is designed to help enable Partnervest Financial Group LLC and its affiliated entities (“PFG”) to deal with ongoing business needs in the event of a Significant Business Disruption (“SBD”). All PFG employees and representatives need to understand and know their responsibilities, and what to do in case of an emergency. PFG’s policy is to respond to a Significant Business Disruption (SBD) by taking reasonable measures designed to safeguard employees’ lives and firm property, making a financial and operational assessment, quickly as practicable recovering and resuming operations, protecting the 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 take steps towards assuring customers prompt access to their funds and securities and/or assisting them in transferring their business elsewhere.

I. TYPES OF SIGNIFICANT BUSINESS DISRUPTIONS (“SBD”)

A. LIMITED SBD

This is a SBD affecting only a portion of the firm’s ability to operate such as a partial flood or fire in our building or extended power outage. This also encompasses an outage of one or few service providers, such as a custodian.

B. LOCAL SBD

This is an external SBD’s preventing the operation of our business in a localized geographic region from such things as a terrorist attack, a blackout, or other geographically limited regional disruption.

C. LARGE SBD

This is an external SBDs preventing the operation of our business in a large geographic region from such things as a terrorist attack, a blackout, or a wide-scale, regional disruption.

II. DECLARATION OF SBD

Upon circumstances occurring which have or may give rise to a SBD, the following individual(s) in order of priority shall be responsible for declaring that an SBD exists and the type of SBD. The person making this declaration shall then start the procedure in this plan to implement the company’s disaster recovery.

1) Ken Hyman
(805) 967-4292
(805) 722-2286 cell#
khyman@partnervest.com

In the event that Ken Hyman is unwilling or unable to make such a determination and/or commence implementation of the plan, then;

2) Marcy Burton
(805) 565-0853
(805) 680-7311 cell#
mburton@partnervest.com

These names will be updated in the event of a material change, and our Executive Representative (Ken Hyman) will review periodically not less than once per year.

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III. RESPONSE TO DECLARATION OF SBD

A. OBTAIN AND REVIEW A COPY OF SBD PLAN

Upon notification of declaration of a SBD, each employee shall obtain a copy of and refresh their familiarization with the SBD plan. A copy of the SBD plan should be obtainable in their desk and also at:

F:\Compliance\PAS\Business Continuity Plan\PFG_Business_Continuity_Plan_2015.pdf.

Each employee and representative should be familiar with the SBD plan and keep a copy of the plan outside of their business location for referral in case of emergency. If a hard copy is not available, log into the Partnervest SharePoint site at <http://sharepoint.partnervest.com> using your e-mail User ID and password. The BCP tab will contain links to the BCP located on the Egnyte cloud site.

The company shall also maintain a copy of a redacted version of the plan available to clients on the Partnervest website at www.partnervest.com and also available by written request.

B. IMPLEMENT THE CALLING TREE

The person making the declaration of the SBD shall contact Ken Hyman who shall in turn contact those underneath his name. Those persons, will in turn contact the persons under their name. In the event that Ken Hyman or another person who is responsible for contacting others is unable or unwilling to contact others, then the responsibility shall fall on the next person under that person's name. For example, if Ken Hyman is unwilling or unable to contact those persons under his name then Angie Chen would make the calls allocable to Ken Hyman.

Please refer to Attachment B for phone contact information.

Caller	Last Name	Email
Hyman, Ken		
	Burton, Marcy	[REDACTED]
	Herrell, James	[REDACTED]
	Hyman, Mary-Lyn	[REDACTED]
	Chen, Angie	achen6722@gmail.com
	Mahota, Tina	[REDACTED]
Chen, Angie		
	Yothers, Treven	[REDACTED]
	Berkowitz, Sherry	[REDACTED]
	Lewis, John	[REDACTED]
	Purpero, Tony	[REDACTED]
	Yothers, Treven	treven.y@gmail.com

Caller	Last Name	Email
	Hu, Jiang	[REDACTED]
	Gomez, Maricela	[REDACTED]
	Martin, Steven	[REDACTED]
Herrell, James		
	Valdez, Becky	[REDACTED]

** All cell phones should be turned on, carried, and charged periodically.

If a person on the above calling tree cannot be contacted then contact with the person should be attempted through contacting the person's emergency contact listed in Attachment B.

C. FOLLOW THESE PROCEDURES ONCE SBD DECLARED

1. IN GENERAL

i. KNOW WHO IS THE DEPARTMENTAL PERSON IN CHARGE

The following individuals (or the listed alternate in succession) will be responsible for taking actions and working with others to continue the departmental functions allocated to them.

Name	Department	Phone **
Angie Chen	Finance & Operations (Safety Monitor)	805-705-0631 (cell)
Ken Hyman	Finance Alternate 1	805-722-2286 (cell) 805-967-4292 (home)
Ken Hyman	Executive Management	805-722-2286 (cell) 805-967-4292 (home)
John Lewis	Technology (Safety Monitor Alternate 1)	805-451-0907 (cell)
Tina Mahota	Compliance Alternate 1	952-686-1070 (cell)

ii. LOCATE, OCCUPY, AND SET UP ALTERNATIVE OFFICE SPACE

If the Company's current office space is uninhabitable then the following should be done:

a. LOCATION AND OCCUPATION

Ken Hyman or in the alternative, Marcy Burton shall select the appropriate alternative office location based upon the type of SBD declared, as follows:

1. LOCAL SBD

Contingency location #1 Marcy Burton's House

The first contingency location will be Marcy Burton's house, located at 815 Cima Linda Lane, Santa Barbara, CA 93108. This pre-defined meeting place will serve as a location for key staff members to plan our response to the situation.

- 3 land lines w/1 split line for dedicated fax

- Cox Cable modem
- 3 / HP Printer Scanners, 2 / HP Copier
- Secure wireless router 3 open slots

Contingency location #2: Ken Hyman’s House

In the event that Marcy Burton’s house is not available or are uninhabitable, the 3rd contingency location will be Ken Hyman’s house, located at 660 Walnut Lane, Santa Barbara, CA.

- 1 land line
- Cable modem with wireless router
- All in one color copier/printer/scanner
- HP desktop
- Sony laptop

2. LIMITED SBD

South Locations

1. Embassy Suites Mandalay Beach, Hotel & Resort
 2101 Mandalay Beach
 Oxnard, CA 93035
 805-984-2500
 Fax: 805-984-8339

Hwy 101, exit Victoria Ave. Turn left (south) onto Victoria Ave. and proceed 5.5 miles to Channel Islands Blvd. turn right onto Channel Islands Blvd. and proceed to the 3rd stoplight. Turn left on Costa de Oro to Resort.

2. Embassy Suites Los Angeles
 1440 East Imperial Avenue
 El Segundo, CA 90245
 310-640-3600

From I-405 TO I-105 West, where freeway ends. Left on California Street (first signal) and left on Imperial Avenue.
 *From North: 405 S. TO 105 W. until it ends, left on California Street, left on Imperial Avenue.

North Locations

1. Embassy Suites, Lompoc
 1117 North H. Street
 Lompoc, CA 93436
 805-735-8311
 Fax: 805-735-8459

Hwy 101 North to Hwy 246 West. As you come into Lompoc, Hwy 246 becomes Ocean Ave. make a right turn onto “H” Street and the hotel will be on the left hand side of “H” Street.

2. Embassy Suites, San Luis Obispo
 333 Madonna Road
 San Luis Obispo, CA 93405
 805-549-0800
 Fax: 805-543-5273

Hwy 101 North to Madonna exit. Left on Dalidio road.

3. LARGE SBD

North Location

Embassy Suites, Santa Clara
 2885 Lakeside Drive
 Santa Clara, CA 95054

From 101 Freeway, take the Bowers Avenue exit. Turn left at Great America Parkway. Continue onto Bowers Avenue. Turn Right at Augustine Drive. Turn right at Lakeside drive. Destination will be on the right.

(408)496-6400

South Location

Embassy Suites, Los Angeles Airport
9801 Airport Blvd
Los Angeles, California, USA, 90045
310-215-1000
Fax: 1-310-215-1952

From San Diego Fwy-405 - Exit West on Century Blvd. Go one mile to Airport Blvd. Turn right then left to hotel. Entrance to hotel parking garage is located on Airport Blvd. From Century Fwy - 105 - Exit North on Sepulveda Blvd. Turn right onto 98th St. The hotel is at the corner of 98th and Airport Blvd.

East Location

Embassy Suites Las Vegas
4315 Swenson Street
Las Vegas, Nevada, USA, 89119
702-795-2800
Fax: 1-702-795-1520

From I-15 Exit Tropicana Ave. Take Tropicana Ave. East to Swenson Ave. Take Swenson North 1/4 mile and the hotel will be on the left. From McCarran International Airport take Swenson Ave. North 1 mile and the hotel will be on the left. From the Las Vegas Strip take Tropicana East to Swenson Ave. Take Swenson Ave. North 1/4 mile and the hotel will be on the left.

iii. SET UP OF OFFICE SPACE

Set up shall be overseen by John Lewis, and in the alternative by Jiang Hu. In the absence of the foregoing, persons should contact the Company's outsource technology provider Landspeed: (805) 682-9981 option 2. John Lewis (or an alternate as stated above) shall notify Jiang Hu or Angie Chen when the foregoing is up and running, who shall in turn notify representatives. As Internet and Fax capabilities will be necessary for the short and long term operation of Partnervest, any alternate office location will need to have at the minimum a working Internet connection and one computer.

a. PHONE

The company uses the ShoreTel system for phone service. The ShoreTel system is VOIP technology and requires electrical service and the appropriate servers and switches to work. In the event of a SBD which eliminates the use of our phones, the main PFG numbers (805) 966-1266 and (888) 991-9969 will be forwarded to the new office location. To do so, the appropriate personnel will contact Cox Communications technical support at (805) 683-0059 to inform them to forward the primary phone numbers to the new appropriate location. The company also maintains an emergency smartphone which has all employee and advisor phone numbers.

b. EMAIL

Partnervest email is outsourced to Aptix and there should be no disruptions in email services. If individuals lose access to the Partnervest website, they can access Webmail at <https://mail.apptix.net> . Enter your Partnervest login and e-mail password.

c. FAX

If an Internet connection is available, Partnervest can utilize its www.efax.com account to handle all fax capabilities. The login name is: [REDACTED] and password is: [REDACTED] During a BCP the normal fax 805-966-1299 will be forwarded to the efax number. If no internet is available, then a traditional fax machine can be used as provided by the alternate office location.

d. WEBSITE

Partnervest's public website www.partnervest.com is hosted by Dowitcher Designs. There should not be interruption to this service. For problems related to the website Dowitcher can be reached at: Amber Wallace, Dowitcher Designs Web & Graphic Design at 805-681-1930 or www.dowitcherdesigns.com.

e. ACCESS TO DATA AND RECORDS

Partnervest produces and stores paper and/or Laserfiche digital images of all relevant access data and programs so that in the event that the security access files or programs are destroyed or corrupted due to an event, they can be reconstructed in accordance with Securities and Exchange Commission regulations.

PFG maintains its primary hard copy books and records and its electronic records at the home office, 1216 State Street, 3rd Floor, Santa Barbara, CA 93101. Older records are stored at Bond Storage Co., 719 Bond Avenue in Santa Barbara. PFG maintains the following document types and forms as hard copy and as scanned data that is backed up to our server room Datto backup hard drive, as well as to our Egnyte cloud storage site.

- a. New accounts files
- b. Corporate records
- c. Financial records
- d. Representative files
- e. Compliance files

PFG uses Laserfiche, which is a document imaging and management software technology that stores, indexes and retrieves scanned electronic images. All new account files, corporate records, and other critical documents are scanned into this system. In the event of an internal or external SBD that causes the loss of our paper records, we will recover them from our Datto backup device or from the Egnyte cloud.

f. ACCESS TO PORTFOLIO DATA

Partnervest outsources our portfolio management data to Orion Advisor Services. Contact information is: (402) 496-3513. Access via Citrix is:

<https://remote.orionadvisor.com/vpn/index.html>

Access via internet is: <http://www.orionadvisor.com/>. Contact at Orion is Marchello Gomez at 425-379-8030, strategicsg4@orionadvisor.com

g. ACCESS TO FINANCIAL INSTITUTIONS

Ken Hyman is the CEO, President, and Financial Operations Principal, and is responsible for maintaining and monitoring PFG's financial condition and credit risk exposure. 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. If we determine that we may be unable to meet our obligations 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 Advisor representatives and clients. If needed, we will contact our bank relationship manager, Bibi Moezzi, at Heritage Oaks Bank, (805) 899-4300. We will contact our Advisors and business partners in a commercially reasonable manner to apprise them of how to contact us; this will be done by direct phone calls and by postings on the Partnervest web site.

iv. NOTIFICATIONS

a. NOTIFICATION OF CUSTODIANS

PFG's affiliate Partnervest Advisory Services LLC conducts registered investment advisory services through several custodians including TD Ameritrade, Pershing LLC, Schwab, and Fidelity. This consists of equity, option, mutual fund, fixed income, and other types of securities. We also conduct business directly with other financial institutions (e.g. insurance). PAS is an advisory firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All brokerage transactions are sent to our clearing firm, which executes orders for our firm, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customer accounts, can grant customers access to them, and delivers funds and securities. Our firm services both retail and institutional customers.

The Operations person in charge (see list in section C.1.i) shall notify custodians of the SBD and work with the Technology person in charge to ensure that the company's connections to the custodians is uninterrupted or restored as soon as practicable. The Operations person in charge shall notify the custodians of any alternative methods of communication with company personnel and keep them periodically advised of the status of the SBD and its anticipated resolution.

Attached in Attachment A is a list of the contact information for our custodians.

b. NOTIFICATION OF ADVISOR REPRESENTATIVES

The Operations person in charge shall commence the advisor representative calling tree listed in Attachments B and/or communicate with them through other means listed on Attachment B.

c. NOTIFICATION OF CLIENTS

If our Internet access is available, PFG will post on our Web site that customers may access their accounts by contacting the Partnervest Home Office (805) 966-1266 option 2 or their Advisor Representative.

d. NOTIFICATION OF VENDORS

1. INSURANCE VENDORS

Ken Hyman will contact Glen Estabrook with Brown and Brown, our property and casualty carrier (805) 964-1240. John Lewis will contact the telephone company, Verizon Wireless, (800) 483-5000 and Cox Cable (805) 683-0059 and other non-critical providers. Angie Chen will contact the Santa Barbara Post Office at 836 Anacapa Street (805) 564-2226, Federal Express (800) 463-3339, and other necessary providers.

2. GRANADA BUILDING MANAGER

Our Granada Tower building manager is Carolle Van Sande:

Carolle Van Sande
Bristol Property Management, Inc.
2920 De La Vina Street
Santa Barbara, CA 93105
Office: Cell: 805-455-7832
carolle@bristolsb.com

3. BANKS

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD and have a line of credit established with Heritage Oaks Bank. Upon an SBD we will notify the bank. The bank maintaining our operating account is Heritage Oaks Bank, and the contact is Bibi Moezzi (805) 879-7106.

4. OTHER VENDORS

The following is a list of vendors that PFG will contact if necessary in the event of a disaster.

24 Hour Emergency Fire/Water	911
Alarm Company	800-600-5145

Animal Control	805-963-1513
Apptix	866-428-0131
Civil Defense Disaster Information	805-965-3828
Granada Tower / Carolle Van Sande	Cell: 805-455-7832
Lanspeed	805-682-9981 option 2
Cox Cable	805-683-0059
Damage Services: SB Building Svcs	805-455-1381
Disaster Assistance Information	800-525-0321
Fire Department	911 or 805-965-5254 or 805-681-5500
Orion	402-496-3513
Police Department	911 or 805-897-2300
Public Works/Storms/Drains/Streets/ Reclaimed Water	805-564-5413 805-963-4286 (after 4pm or Sat/Sun/Holiday)
Time Warner	805-879-7822
Verizon Wireless	800-483-5000

2. PARTICULAR SBD ISSUES

i. LIMITED SBD: TRANSACTING WITH CUSTODIANS

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 and entry. Our custodial firms are responsible for 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.

ii. INTERIM OPS FUNCTIONALITY

a. TEMPORARY OPERATIONS OUTSOURCE

In the event that during either a limited, local or large SBD, if trading and basic operations functionality cannot be immediately established, then the Operations person in charge and/or the Director of Investments shall contact Tina Mahota (at ccmahota@hotmail.com or phone: [REDACTED]) and work closely with her to ensure that she handles operational, e.g. trading approval, tasks until operations can be established locally.

b. ORDER TAKING

Currently, our firm places orders for accounts under the STAR programs or as contracted with the advisors for STAR I accounts. During an SBD, either internal or external, we will continue to place orders for STAR accounts. If advisors normally process trades through our back office, we will instruct the advisor to contact the Partnervest trading desk manager at each custodian to transact trades. We will inform our advisor representatives by phone and/or by the PFG website,

when communications become available, to tell them what alternatives they have to submit their orders to us. If necessary, we will advise our advisor representatives to place orders directly with the custodian.

c. ORDER ENTRY

Currently, our firm enters orders electronically or by telephone. In the event of an SBD, we will enter and send orders to the custodians by the fastest alternative means available, which may mean calling the desk directly, calling another custodian location, or entering orders on an alternative system. In addition, during an SBD, we may need to refer our Advisor representatives to deal directly with our custodians for order entry.

d. DOCUMENTS & FORMS

Knowing that our library of forms is important to the continuance of our business, the Company maintains a backup set of its forms which it will make available on Egnyte and can be retrieved by PFG Staff.

iii. PHYSICAL EVACUATION AND FIRST AID

In the event of an emergency during office hours, Safety Monitors, (Angie Chen and John Lewis) will help to evacuate employees from our facility. The Safety Monitors will also be responsible for ensuring that the equipment specified in Attachment D is removed from the office. Employees are instructed to move away from the building and meet in the Spencer Adams parking lot. Please do not leave this area unless so instructed by a Safety Monitor.

IV. UPDATING THIS PLAN

Ken Hyman, PFG's CEO and registered principal, is responsible for approving the plan and for conducting the required annual review. Ken Hyman has the authority to execute this Business Continuity Plan and may delegate responsibility to periodically update information.