



## Disclaimers

### Disclosure Information

#### Privacy Notice

Brasil Plural Securities (BPS) collects nonpublic personal information about you, including information such as your name, address, account balances and transaction information, from your account application and other forms that you may deliver to us, and from your transactions with us and our affiliates. You should read this notice carefully to understand what information we collect and what we do with it. In order to conduct your transactions and service your account properly, we may disclose all of the information that we collect, as described above, to firms that assist us in servicing your account, such as the clearing broker-dealer, which is Pershing, LLC.

All records containing your nonpublic information are kept at our principal place of business and may also be kept by our service provider(s), such as Pershing, LLC.

In connection with servicing your account, your nonpublic personal information may be shared with entities named in this notice, their affiliates, and non-affiliates who provide services regarding or relating to your account, including transfer agents or other service companies. Our affiliates and any non-affiliated service providers are required to protect the confidentiality of your information and to use the information for the sole purposes for which disclosure to them is made. Service providers restrict access to nonpublic personal information about you to those employees who need to know that information to provide products and services to you. BPS, our affiliates, and the service providers we use maintain physical, electronic, and procedural safeguards to maintain the security of your nonpublic personal information.

BPS do not sell nonpublic personal information. BPS do not disclose nonpublic personal information about customers to non-affiliated third parties, except as described in this Privacy Notice or except as permitted or required by law.

In the event that you close your account or become an inactive customer, we will adhere to the privacy policies and practices as described in the Privacy Notice.

### Business Continuity Plan Disclosure

#### BPS Policy:

BPS policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and the Firm's property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Firm's records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities. Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs only affect the Firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, hurricane 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 our clearing firm. The Firm conducts business in equity, fixed income, and derivative securities. The Firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. BPS accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them, and delivers funds and securities. The Firm services retail and institutional customers.

Communication with our employees and clients in the event of a disruption:

BPS now communicates with our employees using the telephone, via e-mail, and in person. 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. BPS will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. BPS have identified one person from each team to be in charge of contacting other members of their team.

Our Firm's Mission Critical Systems:

➤ **Order Taking**

Currently, the Firm receives orders from customers via telephone/fax/email/in-person visits by the customer. During an SBD, whether internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by telephone, fax, e-mail, in person or any other method available. If necessary, we will advise our customers to place orders directly with our clearing firm using emergency numbers.

➤ **Order Entry**

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. Alternatively, we place customer orders through backup electronic systems or telephonically. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include telephone, email, fax, or electronically. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

➤ **Order Execution**

BPS currently execute orders by telephone or electronically. In the event of an internal or external SBD, we would move to our alternate location and proceed to enter orders by telephone, fax, email or electronically.

➤ **Mission Critical Systems Provided by Our Clearing Firm:**

BPS relies, by contract, on our clearing firms to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

Customers' Access to Funds and Securities:

The Firm does not maintain custody of customer funds or securities, which are maintained at our clearing firm, (Pershing, LLC). In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf:

Customer Service:  <b>Brasil Plural Securities, LLC</b> 950 Third Avenue, Suite 1702 New York – NY 10022 Tel (212) 388 5600
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### **SEC Rule 606 - Routing of Customer Orders**

Securities and Exchange Commission Rule ("SEC") 606 requires broker-dealers that route client orders in certain equity and option securities to make a general overview of their routing practices available in the public quarterly reports filed. Upon written request, Brasil Plural Securities will provide the market center location to which your specific equity and/or option order was routed for execution, and/or a copy of our website information.

The most recent quarterly report is available here: <https://www.orderroutingdisclosure.com/>

Please insert "Herold & Lantern Investments, Inc." in the search tab, due to the Firm's sub-clearing relationship with Herold & Lantern Investments, Inc.

### **FINRA Regulation Public Disclosure Program**

FINRA Regulation, Inc., a subsidiary of the Financial Industry Regulatory Authority, is charged with regulating the securities industry and oversees virtually all U.S. stockbrokers and brokerage firms. BPS are advising you, our customer, that available to you is the FINRA Public Disclosure Program. This Program provides you with a reference tool regarding us and your broker. Public Disclosure Program Hotline Number: 1-800-289-9999. FINRA Regulation Website: [www.FINRA.org](http://www.FINRA.org). In addition, please be aware that available on the FINRA website is an investor brochure that includes information describing the Public Disclosure Program.

### **FINRA 2261 - Disclosure of Financial Condition to Customers**

BPS will make available, upon request, a statement of financial condition as disclosed in its most recent balance sheet prepared either in accordance with the firm's usual practice or as required by any state or federal securities laws, or any rule or regulation there under.

### **SIPC Disclosure**

Customers can obtain information about SIPC (including the SIPC brochure) by contacting SIPC by phone at (202) 371-8300 or by going to the SIPC website ([www.sipc.org](http://www.sipc.org)).