

# Bluetower Associates

## Disclosure Summary

### Overview

XT Capital Partners LLC ("XT Capital;" "the Firm") has created and implemented a business continuity plan ("BCP") in an effort to mitigate the effects related to unforeseen business interruptions. This BCP is designed to enable the Firm to continue or resume its third-party marketing services in the event of an emergency or significant business disruption ("SBD").

### Communications and locations of Employees during a disruption

In the event of an SBD, XT Capital will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to alternative back-up locations. Recovery time for most of the applications involved in the Firm's advisory services and relocation to alternate locations is expected to range from immediate to 24 hours.

### Communications with Customers

XT Capital currently communicates with its clients using the phone, email, fax, US Mail, its website, and in person. In the event of an SBD, XT Capital will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if all traditional means of communication are not available, XT Capital will post emergency contact information and instructions on its web site ([www.XTCapital.com](http://www.XTCapital.com)) regarding access to XT Capital representatives.

### Books & Records

XT Capital maintains its hard-copy books and records and electronic records primarily at its Main Office and back-up books and records at alternate locations. If records are lost as the result of a business disruption or for any other reason, XT Capital has the means to physically recover data from both physical and electronic back-up locations.

### Vendors and Counterparties

XT Capital currently communicates with its clients using the phone, email, fax, US Mail, its website, and in person. In the event of an SBD, XT Capital will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if all traditional means of communication are not available, XT Capital will post emergency contact information and instructions on its web site ([www.XTCapital.com](http://www.XTCapital.com)) regarding access to XT Capital representatives.

### Disclosure

XT Capital's BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and XT Capital cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, XT Capital has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP, XT Capital will send an updated copy to all of its clients.

The information contained in this disclosure is provided by XT Capital for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and XT Capital.

Bluetower Associates LLP offers securities in the USA through XT Capital Partners, LLC  
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