

## Annual Compliance Notices

### **Business Continuity Plan**

Burnham Financial Group ((which consists of Burnham Securities Inc. (BSI) and Burnham Asset Management Corp. (BAM)) conducts business in equity, fixed income and derivative securities. BAM is the investment advisor of Burnham Investors Trust – a mutual fund group. BSI is a broker/dealer, and is principal distributor of Burnham Investors Trust fund shares.

BSI is an introducing firm to J.P. Morgan Clearing Corp., 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. Our clearing firm also custodies our customers' accounts, can grant customers access to them, and delivers funds and securities.

In the event of a Significant Business Disruption (SBD) in New York City, we will move selected staff from the affected office to either our Chicago or Houston offices. Approximate recovery time: 6 hours. If a SBD occurs at another office location, certain employees would relocate to another Burnham branch office. Burnham Investors Trust would operate out of its administrator's facility in Boston, MA and King of Prussia, PA. Approximate recovery time: immediate. Were the New York Metropolitan area to be severely disrupted, operations would be based from individual homes, Houston or Chicago. Approximate recovery time: 24 hours.

Our firm's "mission critical" systems are those that ensure the prompt and accurate processing of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. More specifically, those systems include: J.P. Morgan Clearing Corp. trading and customer platforms, Market data and news services, and back office communications, BSI's phone, fax and email capability.

Our clearing firm, J.P. Morgan Clearing Corp., maintains a business continuity plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other correspondents.

Our clearing firm represents that it backs up their records at a remote site and that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing. Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure – particularly telecommunications – can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process the new transactions and payments after a wide scale disruption. Our clearing firm represents that its mission critical systems would be fully operational within 12 hours of a declared disaster. Information on J.P. Morgan Clearing Corp. business continuity plans may be found at:

[http://www.jpmorgan.com/cm/cs?pagename=JPM/DirectDoc&urlname=BDS\\_BusinessContinuityPlanDisclosure.pdf](http://www.jpmorgan.com/cm/cs?pagename=JPM/DirectDoc&urlname=BDS_BusinessContinuityPlanDisclosure.pdf)

## **Alternate Communications between the Firm and Customers, Employees, and Regulators**

We now communicate with our customers, employees and regulators via phone, email, our website, fax, US mail, courier and overnight delivery services, and in-person visits at our offices or customer-specific locations. In the event of a 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. In the event of a SBD, customers should use the following means to obtain information regarding contacting Burnham:

Client information and updates, and Business Continuity Disclosure:

[www.burnhamfinancial.com/client\\_emergency](http://www.burnhamfinancial.com/client_emergency)

(Provided as well on a hyperlink on Burnhamfinancial.com homepage)

Client updates by phone (lines may be diverted):

Messages will be recorded on:

Burnham Funds: 800-874-3863

Burnham Securities and Asset Management clients: 800-881-6543

General: 212-262-3100

Lengthy messages or conference calls will be hosted by Verizon Conference Line.

Information will be provided.

We may deviate from this plan if circumstances demand, if it places our employees at physical risk, where we may possibly violate any permanent or temporary laws, or if such actions would violate our customers' best interests. The plan may be revised based on any deviations that occur.

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## **Privacy Policy**

Burnham Financial Group honors your relationship with us, and we respect the confidentiality and security of your private personal and financial information. Our Privacy Policy is in place to protect your information while serving your investment needs.

We ask for personal information about you when you open an account with our firm. This information may include your name, address, social security number, account statements, and information from third parties such as other banks or brokerage firms, accountants and attorneys. We use this information to evaluate and serve your financial needs, to fulfill your investment requests and complete your transactions.

Burnham Asset Management Corp. and Burnham Securities Inc. contract with other firms in order to provide you with a full range of services, and we may share aspects of your personal information in the course of conducting your business. For accounts at Burnham Securities Inc., this includes our clearing firm, J.P. Morgan Clearing Corp., and other firms with whom we may trade securities on your behalf. For Burnham Asset Management, this may include Burnham Securities and J.P. Morgan Clearing Corp., or other brokerage concerns, plus outside custodial agents as you may direct. We will not sell, market or otherwise disclose any information about you or your account to any third party or individual.

In order to service your account, we may need to work with unaffiliated parties for services such as account maintenance or administration. We maintain strict guidelines reflecting their business standards and their privacy policies. We also restrict access to your nonpublic, personal information to those employees, agents and parties who need to know the information in order to process your transactions or supervise your account. If you ask us to provide information to one of your agents, for example your accountant or attorney, we will honor that request. Our industry is regulated, and at times we are obliged to disclose information during routine audits by U.S. government regulators, the Financial Industry Regulatory Authority (FINRA), or other official regulatory agencies. The purpose of these audits is to review our firms' compliance with the rules and regulations of our industry, to detect fraud or unauthorized transactions, or to comply with a court order.

We also maintain safeguards that comply with federal and technological standards to safeguard your data. We regularly evaluate and update our systems to ensure the highest levels of security.

If you have any questions, please do not hesitate to contact your account representative.

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### **SIPC Information (Securities Investors Protection Corporation)**

The Securities Investor Protection Corporation either acts as trustee or works with an independent court-appointed trustee in a missing asset case to recover funds. The statute that created SIPC provides that customers of a failed brokerage firm receive all non-negotiable securities that are already registered in their names or in the process of being registered

You may obtain information about SIPC, including the SIPC brochure, by any method below:

Securities Investor Protection Corporation  
805 15th Street, N.W. Suite 800  
Washington, D.C. 20005-2215

[www.sipc.org](http://www.sipc.org)

Tel: (202)371-8300  
Fax: (202)371-6728  
Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)

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### **Request for records regarding employment, directorship or ownership of 10% or more of a corporation**

For compliance purposes we are required to maintain records regarding your significant employment or investment relationships with public and non-public corporations.

**Please advise your Burnham financial representative if you or any member of your immediate family owns 10% or more of a public or non-public corporation, or is a director or an officer of a public or non-public corporation. Immediate family includes your spouse, child(ren), siblings, parents or in-law.**

We also request that you confirm any information that you have previously disclosed to your representative, and please advise him/her if your status has changed. We also remind you to inform us promptly of any changes should they occur in the future.

Burnham will ask you for this information upon opening an account, and on an annual basis thereafter in writing.

Thank you in advance for your cooperation.

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### **Protecting yourself against identity theft**

Do not give your financial information, checking account, debit/credit card numbers, or your social security number to anyone over the telephone or email, unless you know the person or organization you are dealing with. Confirm with the representative that email correspondence they use that includes this information is encrypted.

Report lost or stolen checks, or unreceived statements immediately. Review new deliveries of checks to make sure none have been lost or stolen in transit.

Notify your registered representative or brokerage branch manager of any suspicious telephone inquiries such as those asking for account information to 'verify a statement' or 'award a prize'.

Shred financial solicitations or financial statements before disposing of them.

Deposit your mail into a secure, official Postal Service collection box. Identity thieves may use outgoing mail (which may be left in your mailbox for the carrier) containing your checks or other information to steal your identity.

If regular bills or statements fail to reach you, call the company to find out why. Identity thieves may have filed a false change of address notice to divert your mail to their own address.

If your bills or statements include questionable items, investigate them immediately. This is often an early indicator of identity theft.

Contact the major credit reporting companies to review your file and make certain the information on file is correct. For a small fee you may obtain a copy of your credit report at any time. The three major credit bureaus are: Equifax (800-685-1111), Experian (888-397-3742) and Transunion (800-888-4213).

**BSI maintains rigorous information security programs and privacy policies to protect your personal and financial information.** Access to non-public information about you is limited to employees who need to know that information to provide service to you. Before using any of our online services you will be assigned your own personal password. It is important that you protect this information. Do not leave it in a place where it may be easily found, such as in your wallet or taped to a monitor. Whenever you are online with our clearing firm to access your account at BSI, powerful encryption software secures your personal information.

For more information about identity theft protection, go to [www.ftc.gov](http://www.ftc.gov).