

## ANNUAL DISCLOSURE STATEMENT

Invictus Timing Service Ltd. (“ITSL”) is an SEC Registered Investment Adviser. This notice contains important information regarding your account with ITSL. Please read it carefully and contact your registered representative with any questions.

### PRIVACY POLICY

#### GUIDING PRINCIPLES

This Client Privacy Notice is being provided to all of our individual clients who obtain financial products or services from us in accordance with U.S. Securities and Exchange Commission regulations. The relationship of trust between Invictus Timing Service Ltd., and our clients is the most important asset of our firm. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect your personal information to the best of our ability. We realize that all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is permitted by law and necessary to provide you with our services.

#### THE PERSONAL INFORMATION THAT WE COLLECT AND COMMUNICATE

Invictus Timing Service Ltd., collects and maintains your personal information so we can provide investment services to you. The types and categories of information we collect about you includes: Information we receive from you on applications and during your interview with us about your personal finances and profile (such as name, home address, telephone number, social security number, investment and income data, investment and financial objectives, risk tolerance, and other pertinent information); Information from transactional activity in your account (such as trading history and account balances); Information that we may receive from third parties with respect to your account or transactions (such as trade confirmation).

We do not share or sell your personal information to anyone. We also do not disclose your personal information to anyone, except in very limited circumstances in order to provide you with our services such as providing account information to custodians and our affiliate broker-dealer. In addition, we are also required to disclose your personal information with your consent and to fulfill your instruction, or to comply with applicable laws and regulations.

## HOW WE PROTECT YOUR PERSONAL INFORMATION

To fulfill our privacy commitment at Invictus Timing Service Ltd., we have instituted firm-wide practices to safeguard the information we maintain about you. These included: Adopting policies and procedures that put in place physical, electronic, and procedural safeguards to keep your personal information safe and are designed to comply with federal standards to guard your information; Limiting access to personal information to those employees who need it to perform their job duties; Requesting that any third parties that perform services for us to agree to keep your information strictly confidential; Protecting information of our former clients to the same extent as our current clients.

## BUSINESS CONTINUITY PLAN

Invictus Timing Service Ltd. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us - If after a significant business disruption, you cannot contact us as you usually do at 516-741-0500, you should contact our custodian, Axos Advisor Services, LLC (“Axos”) at 303-705-6000 or by mail to 7103 S Revere Pkwy, Centennial, CO 80112. Since we don't maintain custody of customers' fund or securities, we rely on the Axos for order execution, comparison, allocation, clearance, settlement of securities transactions, maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our Business Continuity Plan - We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical suppliers and data vendors; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

ITSL primarily maintains electronic books and records. Electronic records are backed up regularly. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by their objective is to restore its own operations and be able to complete existing transactions and accept new

transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions - Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business as quickly as possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business. In either situation, we plan to continue in business and to notify you through whatever means available. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at 516-741-0500 or at the address below:

Invictus Timing Service Ltd.  
c/o Compliance  
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