

FAQ: Supporting Your Compliance with Regulation S-P

(17 CFR Part 248, Subpart A)

1. How does Cohen & Co help clients comply with Regulation S-P's data protection requirements?

Cohen & Co maintains physical, technical, and administrative safeguards to protect confidential client information as outlined in our written information security plan. These safeguards have long been in place, well before the technology amendments to Regulation S-P were adopted on May 16, 2024.

2. What is Cohen & Co's process for notifying clients of a data breach?

If we become aware of any unauthorized access to or use of any of your customer's information, we will notify you as soon as practical, but no later than 72 hours, as required by Regulation S-P. That notification will include the relevant details about the incident to support your timely regulatory reporting obligations, and we will keep you informed as more information becomes available throughout the incident resolution.

3. What types of safeguards are in place to protect customer information?

Cohen & Co safeguards your customer's sensitive information with overlapping layers of protection, including multi-level password controls, multi-factor authentication, data encryption (in transit and at rest), and regular required security training for our workforce. We also conduct due diligence and oversight of third-party software and service providers to ensure they meet our security standards.

4. As a client, what is my responsibility as it relates to Cohen & Co helping me comply with Regulation S-P?

As a client subject to Regulation S-P, you must notify us in writing if you are providing us access to nonpublic personal information in the form of customer information, as defined by the regulation, in connection with the services we are performing for you.

5. How does Cohen & Co support clients' ongoing compliance and due diligence efforts?

We provide documentation and responses to due diligence questionnaires, including details about our security policies and positions. Further, our team is available to answer questions and discuss our approach to keeping your customer's information secure, as desired.