

# ThinCats

Business Loans Network Limited ("ThinCats", the "Firm")

## **Business Continuity Policy ("BCP") v.1**

Oct 16

## INTRODUCTION

In the event that BLN business operations are interrupted, or access cannot be gained to its Ashby office, the responsibility for the facilitation of the platform must continue with the least possible disruption and with no adverse impact on the ability to perform these functions.

### 1. PURPOSE

This document describes how ThinCats would respond to a significant disruption to its business operations and outlines plans that would mitigate the impact of such a disruption.

### 2. PLAN INVOCATION

In the event of an incident leading to an evacuation of the Ashby office during office hours, all staff will be expected to either return home where they can remotely access work email and group drives or travel to London office. The Management Team will decide on who works from home and who has to travel to London office depending on the incident. BLN's fire evacuation procedures are outlined in the separate document.

#### 2.1 OUTSOURCED PROVIDERS

BLN's current key outsourced providers.

1. Rolonews LLP acts as a provider of certain software development services to BLN. This includes software development for the main client-facing application ([www.thincats.com](http://www.thincats.com)). *Note that these services are in the process of being transferred in-house and this will be completed by the end of 2016.*

2. Street (UK) Ltd currently undertakes two key roles for BLN:

- The payment, collection, distribution and operation of lender and borrower monies. Operates designated Client Account held at Barclays Bank
- Acts as primary 'Run-Off / Back-Up servicer in the event of BLN ceasing operation

3. Ocean Intelligent Communications provide hosted infrastructure IT services. This includes corporate desktop infrastructure, server infrastructure, network infrastructure, security services, file and standard package (e.g. eMail) support. All data centres are located in the UK.

4. Rackspace Ltd provides hosted infrastructure IT services. This includes hosting of the client-facing application ([www.thincats.com](http://www.thincats.com)) and database including backup, recovery and IT business continuity services. All data centres are located in the UK.

The two independent software systems are employed to support BLN's business; one to manage the platform including lenders registration and auction management up until the point when a loan is drawn down. The other 'Street Serve' system is operated by an independent company that is authorized and regulated by the Financial Conduct Authority Street UK

("Street"). Street controls the back office, administering all the direct debit collections from borrowers, accepting funds deposited into lenders accounts and income allocation. Additionally, it has an ability to calculate the interest earned by each lender. In the event BLN or platform ceasing to operate Street has all the data needed to continue to collect direct debits from borrowers and allocate funds to lenders.

### **3. ROLE PROFILES**

#### **3.1 MANAGEMENT TEAM**

The Management Team in Ashby is comprised of Damon Walford, Jill Sanford, Malcolm Caley, Kevin Caley and Peter Brown. They are responsible for making strategic decisions throughout the recovery of business operations that best serve the joint interests of staff, clients and other stakeholders.

The Management Team's responsibility is to manage and co-ordinate the response to, and recovery from, a crisis. This role will continue through the restoration until the situation returns to normal.

#### **3.2 INFORMATION TECHNOLOGY**

As the IT systems are hosted by outsourcing partners, the Business Continuity Plan (BCP) and Disaster Recovery (DR) processes for IT systems are linked to the related BCP and DR processes for those providers.

As the business is a 'Digital' business and applications are hosted in secure UK data centers offsite then access to those systems can happen from any location where internet services are available. This means that in the event of a disaster at a BLN business location it will be possible to continue to run the business from alternative locations with minimum disruption.

For Corporate IT applications the hosted server infrastructure is constructed as a virtual estate with both primary and secondary data centre backup of all data. This means that in the event of a disaster at the primary site then data can be restored from the secondary site. There is a DR recovery service level of 8 hours.

For the main client application there is a primary and secondary hosting location with replication of code and data between the two sites. The contract provides for a DR recovery service level of 8 hours.

For the loan administration application there is a primary and secondary hosting location with replication of data between sites. There is a DR recovery service level of 6 hours.

The Chief Technology Officer or delegate is responsible for overseeing the testing and maintenance of computer and communications system supported by Ocean/Rackspace, including all telephone and fax communications. The highest priority will be given to restoring, supporting and providing access to the core business systems.

### **3.3 EXTERNAL COMMUNICATIONS**

The Head of Marketing responsibility is to channel and coordinate all formal communications between external parties. The Head of Marketing will act as primary contact for all media agencies and will notify them as appropriate.

### **4. CLIENTS MONEY RESOLUTION PLAN (CASS RP)**

BLN maintain a CASS RP which must be reviewed on a regular basis. This is a Regulatory requirement to ensure that its records are up-to-date and can assist an insolvency practitioner on a primary pooling event. The CASS RP provides relevant practical information and ensures records are readily accessible to the insolvency practitioner, facilitating a prompt return of client money in case of platform failure.