

Rosenthal Collins Group's Privacy Policy

At RCG we value our customers, and maintaining customer trust and confidence is our highest priority. While it is necessary that we obtain accurate and current information about our customers in order to provide the highest level of customer service, we are dedicated to protecting the privacy and confidentiality of our customer's information.

RCG will never sell customer's personal information to anyone. We will not use or distribute your personal information in any way without prior notification to you. We promise that we will uphold the privacy policies and procedures as set forth below.

Information we collect about our Customers

- The personal information we collect from you comes from information you supply to us in account opening applications (whether written or electronic), or in other forms you may provide to us. This information may include your name, address, social security number or tax identification number, and financial information about you.
- Information regarding your transactions with us, including your trading history at RCG, your history of meeting margin calls or your use of the various services and products that we provide.
- Information about your credit history and information we may receive from your IB or AP and other consumer reporting agencies.
- "Cookies" are small text files consisting of encrypted information assigned to a computer's browser. Cookies do not collect or transmit your personal information. For users of the non-public areas of our website or electronic trading platforms that require a User ID or password, RCG may use cookies to identify you so that you do not have to input your password multiple times as you navigate our site. RCG may also use cookies for administrative purposes, such as to maintain security on our site.

Information we may share about our Customers

- **RCG will not sell personal information regarding our current or former customers.**
- RCG may share personal information about our current and former customers with our affiliated companies and service providers around the world. (RCG affiliated companies include our subsidiaries and our GIBs.) In either case, your personal information will remain subject to the strictest confidentiality protections.
- To the extent that we may engage unaffiliated companies to assist in providing services on our web site, such providers will be subject to stringent contractual requirements to maintain the confidentiality of any

personal information they may obtain in connection with the performance of their services for us. We will make every effort to make sure that they receive the minimum amount of personal information necessary and will be allowed to retain that information only for as long as necessary in order to provide such services. Such service providers will only be allowed to use personal information in the course of providing services to RCG and only for the purposes that we authorize.

Information we may disclose

- We may disclose information about current or former customers in order to cooperate with legal or regulatory authorities or pursuant to a court order or subpoena.
- We may also disclose personal information as necessary to perform credit checks, collect debts, enforce our legal rights or otherwise protect our interests and property.

Security

RCG is committed to protection of your personal information and to protecting your privacy.

- Only authorized RCG employees or agents will have access to your personal information. All of our employees, affiliates and service providers are held to the highest standards of privacy and security.

If this privacy policy is changed you will be notified through the Company's web site or in other appropriate ways."