PRIVACY POLICY NOTICE

Effective August 2026

Our commitment: Roberts & Ryan, Inc. protects the confidentiality and security of customer information and uses it only for legitimate business, regulatory, and legal purposes.

Who This Notice Covers

Roberts & Ryan, Inc. ("Roberts & Ryan," "we," "us," or "our") is primarily an institutional broker-dealer. Regulation S-P generally applies to nonpublic personal information about individuals who obtain financial products or services primarily for personal, family, or household purposes. It generally does not apply to information about corporations, partnerships, trusts, funds, governmental entities, or other institutional clients, or to individuals obtaining services primarily for business or commercial purposes.

Because Roberts & Ryan may accept a retail customer by exception, this notice applies to any natural person who is a consumer or customer within the scope of Regulation S-P. We nevertheless protect confidential information relating to our institutional clients and their representatives through our information-security, confidentiality, recordkeeping, and supervisory controls.

Information We Collect

We may collect nonpublic personal information as reasonably necessary to open, maintain, service, supervise, and close an account; process transactions; satisfy legal and regulatory obligations; manage risk; and protect our clients and the Firm. Depending on the relationship, this information may include:

- Identification and contact information, such as name, address, telephone number, email address, date of birth, Social Security or taxpayer identification number, government-issued identification, citizenship, and residency.
- Account-opening and due-diligence information, such as occupation, employer, affiliations, control-person status, investment profile, financial condition, source of funds or securities, beneficial ownership, and information required for customer identification, anti-money laundering, sanctions, and tax compliance.
- Transaction and relationship information, such as account balances, positions, orders, executions, deposits, withdrawals, wire instructions, communications, and information about transactions with us, our clearing or carrying firms, custodians, transfer agents, issuers, banks, and other financial institutions.
- Information received from third parties, such as consumer reporting agencies, identity-verification providers, public records, regulatory databases, service providers, other financial institutions, and persons authorized by you.
- Electronic and security information, where applicable, such as authentication records, device or network information, access logs, recordings, and other information used to operate and protect our systems and services.

How We Use Information

We use customer information only as reasonably necessary for legitimate business, regulatory, and legal purposes, including to:

- Provide brokerage, execution, investment-banking, capital-markets, custody-related, or other authorized securities services;
- Open, maintain, service, supervise, and close accounts and relationships;
- Process and settle transactions and transfer funds or securities as instructed or authorized;

- Verify identity, conduct due diligence, monitor activity, prevent fraud and financial crime, and comply with applicable securities, anti-money laundering, sanctions, tax, recordkeeping, and reporting requirements;
- Protect the confidentiality, integrity, and availability of information and systems; and
- Administer and improve our business operations and respond to requests, examinations, disputes, legal process, or regulatory inquiries.

Information We Disclose

We do not sell nonpublic personal information and do not disclose it to nonaffiliated third parties for their own independent marketing purposes. We may disclose information, as permitted or required by law, to:

- Clearing or carrying firms, executing brokers, custodians, banks, transfer agents, exchanges, alternative trading systems, issuers, settlement organizations, and other parties needed to process, settle, service, or administer an authorized transaction or relationship;
- Vendors and service providers that support technology, communications, identity verification, cybersecurity, document management, archiving, professional services, compliance, operations, or other functions on our behalf, subject to appropriate confidentiality and security requirements;
- Attorneys, accountants, auditors, consultants, insurers, and other professional advisers;
- FINRA, the SEC, other regulators, self-regulatory organizations, governmental authorities, law enforcement, courts, and other persons when required or permitted by law;
- Persons you authorize or direct us to disclose information to, including your representatives and advisers; and
- A successor or proposed successor in connection with a merger, acquisition, transfer, reorganization, or sale of all or part of our business, subject to applicable law and appropriate safeguards.

These disclosures are made to provide requested services, process transactions, maintain or service accounts, protect against fraud or unauthorized activity, comply with legal and regulatory obligations, or for other purposes permitted by Regulation S-P and applicable law. Because our current practices do not involve disclosures that require a Regulation S-P opt-out right, this notice does not include an opt-out form.

How We Protect Information

We maintain administrative, technical, and physical safeguards reasonably designed to protect customer information. Access is limited to personnel and service providers that require the information for legitimate business, regulatory, or legal purposes. Our safeguards include policies and procedures addressing access controls, authentication, secure transmission and storage, vendor oversight, employee training, incident response, record retention, and secure disposal, as appropriate to the nature of the information and our business.

If we become aware of unauthorized access to or use of sensitive customer information, we will investigate and respond in accordance with our incident-response program and provide notice to affected individuals when required by applicable law.

Former Customers

When a customer relationship ends, we continue to protect the information associated with that relationship in accordance with this notice and applicable law. We retain information for the periods required by securities, financial, tax, litigation-hold, and other applicable recordkeeping obligations, after which it is disposed of in accordance with our policies.

Changes and Delivery of This Notice

We may amend this notice from time to time. If we materially change our privacy practices, we will provide a revised notice and any opportunity to limit disclosures that applicable law requires. We provide an initial notice when required. We may rely on an applicable exception from annual delivery when our policies and practices have not changed and we share information only as permitted by law; a current copy remains available upon request.

Questions

Questions about this notice or Roberts & Ryan's privacy practices may be directed to:

Chief Compliance Officer
Roberts & Ryan, Inc.
39 Broadway, Suite 610
New York, NY 10006
866-884-9959
www.roberts-ryan.com