

ROTH CAPITAL PARTNERS PRIVACY POLICY

Roth Capital Partners, LLC recognizes that you expect your personal information to be handled in a professional, confidential manner and we have, therefore, adopted the following policies to safeguard your privacy and to explain the circumstances under which we may collect, maintain and use any non-public personally identifiable information that you may provide us.

We collect information about you to help us serve your financial needs, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. The type of information we collect may include:

- Information we receive from you on applications or other forms (for example, your name, address, social security number, assets and income);
- Information about your transactions with us or others (for example, your account balance, payment history, parties to transactions); and
- Information that we receive from a consumer reporting agency (for example, your creditworthiness and credit history).

We do not share non-public personal information about you with unaffiliated third parties with whom we have no contractual business relationship for their independent use unless (1) you give us permission, (2) it is necessary to complete a transaction on your behalf, (3) it is necessary to protect against fraud, comply with a subpoena or other court order or is otherwise required or permitted by law. We do not sell information about you to outside unaffiliated companies.

Further, we restrict access to your personal and account information to those employees who need to know that information to provide products or services to you and maintain strict physical, electronic, and procedural safeguards to guard your non-public personal information.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change these privacy policies at any time.

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