

RIDGEWAY & CONGER, INC. PRIVACY POLICY STATEMENT

UPDATED JULY 2009

Ridgeway & Conger is a FINRA broker/dealer. As a client of this firm, you should be aware of the firm's policies regarding our use of the information you provide us when establishing or while maintaining a relationship with us.

Privacy Policy

Ridgeway & Conger does not sell personal information about our clients to anyone. We will not share personal information about our clients with other companies unless we need to share the information in order to provide a product or service a client has requested. Unless we tell clients otherwise, these other companies do not have the right to use clients' personal information obtained from our firm in any manner beyond what is required to provide a client's requested product or service. Our firm limits the collection of personal information to what is necessary to administer our business and to deliver our products and services to our clients. It is usually necessary in the conduct of our business that we share information with our affiliates, Legent Clearing, LLC. We do reserve the right to disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities, to perform necessary credit checks or collect or report debts owed to us, to protect our rights or property, or upon reasonable request by the sponsor or provider of a product in which you have chosen to invest. Listed below is the information we do collect and how we use that information:

Forms you fill out to interact with our company such as:

- new account forms
- agreements and contracts
- paystubs
- questionnaires and miscellaneous forms

These forms may request personal information such as your e-mail address, telephone number, mailing address, financial information, employment information, investment objectives and financial needs, and pension information for example.

How we use this information

Your personal information is generally organized according to your name by Ridgeway & Conger. We use your personal information for the purpose of

conducting business with you. At no time do we sell your information or share it unless it is necessary to conduct business with you. On occasion, our clients' service providers such as accountants, attorneys, etc. may request non-public information about them. We will upon request and upon notification to our clients supply such provider with such information.

Protection of Client Information

Ridgeway & Conger's policies require that employees with access to confidential client information may not use or disclose the information except for business use. Access to client information is available to employees on a "need-to-know" basis only and is restricted to certain employees, representatives and agents with a business reason for access to such information. We safeguard information according to established security standards and procedures and train our employees and representatives to understand and comply with these protections.

E-mail at Ridgeway & Conger

Ridgeway & Conger may rely on E-mail as a means of communication between our firm and our clients.

Changes to Firm Privacy Policies

From time to time Ridgeway & Conger may update its privacy policies. All new clients will receive the firm's most current private policy upon entering into an agreement or opening an account with the firm. All clients will be provided with the firm's most current privacy policies at least annually.

Maintaining the Accuracy of Client Information

Keeping client account information accurate and up to date is very important to us. If you ever find that your account information is incomplete, inaccurate or not current, please email or write us at the locations listed below. We will correct any inaccurate or outdated information as soon as possible.

Contacting Us

You may contact us by telephone at: **(315) 662-7450**

Or you may also communicate with us in writing at:

Ridgeway & Conger
2123 Main Street, PO Box 460
New Woodstock, NY 13122

Business Continuity Plan Disclosure for Ridgeway & Conger, Inc.

Ridgeway & Conger, Inc. has developed a Business Continuity Plan (BCP) to strategize how we will respond to any event that may significantly disrupt our business. Since events creating a disruption in business will vary in scope and nature and are unpredictable, we will have to be flexible in responding to such events as they occur.

The plan is designed to address the following areas of concern:

- 1 Books and Records Recovery
- 2 Mission Critical Systems
- 3 Financial and Operational Assessments
- 4 Alternate means of communication between RWC and its customers
- 5 Alternate means of communication between RWC and its employees
- 6 Alternate physical locations of employees
- 7 Critical business constituent, bank and counter-party impact
- 8 Regulatory reporting
- 9 Communication with regulators
- 10 How RWC will ensure that customers have access to their funds and securities in the event RWC determines that it is unable to do business

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records and allowing our customers to transact business. Our BCP is designed to permit our firm to resume operations as soon as possible given the range and severity of the significant business disruption.

Our clearing firm, Legent Clearing, LLC, backs up our important records in an geographically separate area from ourselves and from their home office. While each significant business disruption will pose its own unique problems based on variable external factors, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as quickly as possible. It is possible that your orders and requests for funds and securities could be delayed during this recovery period.

Significant business disruptions can vary in their scope. It could consist solely of an internal disruption, affecting only our firm or the building housing our home office. It could consist of an external disruption, affecting the business district where our firm is located, the city we are in which we are located, or the whole region. In an internal disruption affecting our firm or building housing our firm, we will transfer our operations to an alternate site and expect to recover and resume business within hours of the disruption. In an external disruption, affecting our business district, city or geographic region we will transfer our operations to a site outside of the affected area, and recover and resume business as quickly as possible. In either situation, we plan to continue in business, transfer operations to our clearing firm, if necessary, and notify you via telephone, fax or e-mail on how to contact us. If the disruption is so severe as to prevent us from remaining in business, we will assure our customer's prompt access to their funds and securities.

If after a significant business disruption you cannot contact us as you usually do at 315 662-7450, you should call our alternate emergency number 315 663-4129 or 314 892-1038. If you cannot access us through either of those means, you should contact our clearing firm, Legent Clearing, LLC., at 866 774-0218 on how it may enter your orders, provide prompt access to your funds and securities, maintain your account and perform other trade-related, security and cash transactions.

If you have any questions about our BCP, you can contact us at 315 662-7450.