

Privacy Notice to Customers

Prime Executions, Inc. (“Prime”) is committed to safeguarding all personal information that you provide to us to service your account(s). This notice describes our privacy policy and how we handle and protect personal information that we collect. The provisions of this notice apply to all the present and former customers of Prime who have transacted business with our firm.

Prime has entered into a clearing agreement with Wedbush Securities (“Wedbush”). Prime may introduce your account to Wedbush. Wedbush is not your broker/dealer. Pursuant to the clearing agreement, Wedbush provides to Prime various back office services related to the settlement of security trades. Certain personal information of Prime’s customers, incidental to the performance of clearing services provided by Wedbush, is maintained at Wedbush.

Why and How We Collect Personal Information

As stated above, we collect personal information about you so that we can provide brokerage services to you and inform you about our products and services that may be of interest to you. The personal information we collect about you includes:

- Some of the information you provide to us on applications and other forms (such as your name, address, social security number or tax identification number, etc.);
- Information about your transactions with us or others (such as your account balance, payment history, and parties to transactions); and/or
- Information we receive from consumer reporting agencies (such as your credit history and creditworthiness) and other entities not affiliated with Prime.

How We Protect Personal Information

We limit access to your personal information to those employees who need it in order to conduct our business, clear and settle transactions in your account through Wedbush, and help develop products and services that Prime may offer to you. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. To comply with applicable laws and regulations, we maintain physical, electronic, and procedural safeguards that comply with applicable laws and regulations to protect your personal information.

The Information We Disclose

In order to provide service to your account or effect your transaction, we may provide your personal information to Wedbush to assist us in servicing your account and to certain outside consultants who provide professional compliance and/or operational support to Prime. We may also disclose personal information to regulatory authorities as permitted by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights or property. We do not otherwise provide information about you to outside firms, organizations or individuals.

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.

Opting Out

Please be aware that you have the right to maintain the privacy of your non-public personal information. Should our policies change, we will notify you and at that time, you may notify us, in writing, if you wish that your information not be used for any other purpose than maintaining your account with our firm.

FINRA Public Disclosure Notification

In accordance with the Financial Industry Regulatory Authority (“FINRA”) Investor Education and Protection Rule, you may obtain information on FINRA’s Public Disclosure Program by contacting FINRA at (800) 289-9999 or via their internet address which is www.finra.org. A copy of the investor brochure that includes information concerning FINRA’s Public Disclosure Program can be obtained by calling the number provided or visiting FINRA’s web site.

If you have a question or concern about this notice, please call Prime at (212) 785-0200.

Customer Identification Program Notice

Important information you need to know about opening a new account:

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person or entity that opens an account. This notice answers some questions about Prime’s Customer Identification Program.

What types of information will I need to provide?

When you open an account, Prime is required to collect information such as the following from you:

- Individual or entity name
- Date of birth, if applicable
- Address
- Identification number:
- U.S. Citizen: taxpayer identification number (social security number or employer identification number)
- Non U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You may also need to show your driver’s license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities & Exchange Commission, FINRA, and the New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What happens if I don't provide the information requested or my identity can't be verified?

Prime may not be able to open an account or carry out transactions for you. If Prime has already opened an account for you, we may have to close it.

We thank you for your patience and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to Americas' financial system.

Customer Notice Pursuant to Section 311 of the USA PATRIOT Act

Pursuant to U.S. regulations issued under Section 311 of the USA PATRIOT Act, 31 CFR 103.192, we are prohibited from opening or maintaining a correspondent account for, or on behalf of, Banco Delta Asia SARL, including its subsidiaries Delta Asian Credit Limited and Delta Asia Insurance Limited (Banco Delta Asia or bank), [the "Specified Banks"]. The regulations also require us to notify you that your correspondent account with our financial institution may not be used to provide the Specified Banks with access to our financial institution. If we become aware that the Specified Banks are indirectly using the correspondent account you hold at our financial institution, we will be required to take appropriate steps to prevent such access, including terminating your account.

Notification to Customers

Please direct complaints or concerns with respect to the handling of your account to:

Prime Executions, Inc.
Attn: Compliance Dept.
40 Wall Street, Suite 1704
New York, New York 10005
Telephone: (212) 785-0200

SIPC

You may find information regarding the Securities Investor Protection Act by contacting SIPC directly at (202) 371-8300 or by e-mail: asksipc@sipc.org or you may obtain information through their website: www.sipc.org.

Business Continuity Plan Summary

Prime Executions, Inc. ("Prime") has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – if after a significant business disruption you cannot contact us as you usually do at (212) 785-0200, you should call our alternative number (213) 688-8000. If you cannot access us through either of those means, you should contact our clearing firm that maintains your account for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions.

Wedbush Securities
www.wedbush.com
1000 Wilshire Blvd.
Los Angeles, CA 90017
Attn: Edna Palacios – (213) 688-4568
edna.palacios@wedbush.com

Our Business Continuity Plan – 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. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternative physical location of employees; critical supplier, contractor, bank and counter-party impact, if any; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Wedbush, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firms that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within the same business day. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within a 24 hour period. In the event of a significant business disruption that closes the New York Stock Exchange (“NYSE”), we will move our staff from affected offices to any alternative site designated by the Exchange. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within a reasonable time period. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our customer emergency number. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (212) 785-0200.

SEC Rule 606 Reporting

Securities and Exchange Commission Rule (“SEC”) 606 requires broker dealers that route client orders in certain equity and option securities to make available to the public quarterly reports that represent a general overview of their routing practices. Upon written request, Prime Executions Inc. will provide the market center location to which your specific equity order was routed for execution, and/or a copy of their website information. The most recent quarterly report is available to view at www.primexe.com.