

ROACH ENERGY PRIVACY POLICY



April 29, 2010

Protecting Customer Information: Keeping your personal information secure is important to R.M. Roach and Sons. This Privacy Policy explains how we protect your privacy, when we collect and use information about you in order to administer your account, and the measures we take to safeguard that information.

ALL PERSONAL INFORMATION PROVIDED BY OUR CUSTOMERS IS USED EXCLUSIVELY TO ADMINISTER OUR BUSINESS AND RELATED SERVICES IN A MANNER CONSISTENT WITH ALL APPLICABLE LAWS AND REGULATIONS. IT IS KEPT CONFIDENTIAL AND NOT SOLD TO THIRD PARTIES FOR USE IN MARKETING OR SOLICITATION. WE MAINTAIN YOUR PERSONAL INFORMATION ACCORDING TO STRICT STANDARDS OF SECURITY AND CONFIDENTIALITY.

We require that employees with access to confidential information not use or disclose the information except for our internal business use. Only employees who need this information to service your accounts have access to this information. Such employees are trained to safeguard your personal information.

Who is covered by our Privacy Policy: This Privacy Policy applies to all current and former customers of ours. Our website, www.roachenergygrocs.com, may contain links to unaffiliated websites. We are not responsible for the privacy practices or the content of such other websites.

Customers receive our Privacy Policy when they open a new account. Our current policy is available online at www.roachenergygrocs.com. You will be notified of any major change to the Privacy Policy.

Types of Information We Collect from Our Customers:

- Information from applications, incoming phone calls, online registrations or other forms (such as your name, address, email address, social security number and income).
- Information about your account, account transactions (e.g., account number, spending and payment history, use of online products and services) and other transactions with us and others.
- Information about your creditworthiness, credit history, and information about you obtained from consumer reporting agencies or other companies we work with, and information obtained in connection with our efforts to protect against fraudulent or unauthorized use of your account(s).
- If you visit our website, we use software to collect anonymous data including browser types, pages visited, date of visit and time spent on our site. With or without cookies, our website keeps track of usage data, such as the source address of a page request, your IP address or domain name, the date and time of the page request, the referring website (if any) and other parameters in the URL. We use this data to better understand website usage and to improve our website. The information is stored in log files and is used for aggregated and statistical reporting. This log information is not linked to personally identifiable information gathered elsewhere on the site.
- If you utilize our online services, we retain your user ID and password and information about your use of our website so that we can recognize you as a registered user of an online service and personalize your online session.

Use of Information: When we collect personal information from you, we will reference this policy or otherwise explain to you how we intend to use the information. We use personal information in ways compatible with the purposes for which we originally requested it. We limit the collection and use of personal information to what is necessary to administer our business. We share personal information about you to give you superior customer service, provide convenient access to our services and make a wider range of products available to you. We share this information in the following ways:

- **Legal and Routine Business Reasons.** We may disclose personal information as required by law. We do reserve the right to disclose 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 process and service your account(s), to protect against fraud, to protect the security of our records, to protect our rights or property, or upon your written request. Personal information may be shared with third-

party service providers for the sole purpose of performing services for us. Companies we hire to provide support services must conform to our privacy standards. They are required to keep this information confidential and not use it for any other purpose than to carry out the services they are performing for us, such as printing statements, checks, etc.

- Marketing Purposes. We may also share information we have about you, as described above, with third parties hired by us to market our products and services exclusively.

- Sharing Information within Our Organization. We and our affiliated companies offer various consumer products and/or services. We may share information we have about you, as described above, among these entities. Some of the benefits to you include improved customer service and responsiveness and detection of unusual behavior to help prevent unauthorized transactions or fraud.

If you have any questions, please contact us by email at info@roachenergy.com, or call us between 9:00 a.m. and 5:00 p.m. Eastern Time, Monday through Friday, at 304-263-3329, or send a letter to us at 333 East John Street, Martinsburg WV 25401. We constantly evaluate our procedures to protect personal information and make every effort to keep your personal information accurate and current. If you identify any error in your personal information or need to change that information, please contact us and we will update our records.

Options relating to disclosure of personal information: We will not contact you regarding additional products or services provided by us, and we will not provide personal information to any third parties for this purpose, if you instruct us not to do so. To give us such instructions, please email us at info@roachenergy.com or call us at 304-263-3329. If you choose this option, we will continue to contact you from time to time to notify you of changes or updates to your account, to our services or to our website.