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Please contact us with any questions or concerns regarding our website's Terms and Conditions.

Privacy and Information Security

Federal and state privacy laws require Galapagos to, among other things, disclose how we collect, share, and protect our clients' personal information. We do not sell customer lists and will not disclose your information to other companies who may want to sell their products or services to you. We do not disclose or share nonpublic information about our clients, prospective, or former clients with third parties, except to deliver contracted services, as described below, or as permitted by law.

Galapagos collects information directly from you when you apply for, access, and use the products and services offered by us and/or our business partners or third-party providers, as applicable. The personal information we collect generally includes:

- Information we receive on client account applications (name, social security or tax identification number, address, income, assets, etc.), and
- Information about transactions with our firm or others (account information, payment history, parties to transactions, etc.).

This information may be obtained by telephone, electronically, or in person. We may verify the information you provide to us by obtaining additional information from consumer reporting agencies or other sources.

We may disclose your personal information to law enforcement and regulatory agencies as required or permitted by law. As necessary to service your account and deliver contracted services to you, we will disclose your personal information to non-affiliated financial institutions or third-party service providers with whom we may have arrangements, such as custodians, brokers, administrators, and other service providers to:

- assist us in monitoring and analyzing your financial situation
- assist with reporting and reviews
- enable them to provide business services to us such as accounting, legal, audit, consulting, or other professional services,

Galapagos requires that all third parties and business partners protect our clients' personal information and sign confidentiality agreements. Our technology vendors provide security and access control over personal information and have policies on the transmission of data. We maintain commercially reasonable physical, electronic, and procedural safeguards to protect our clients' nonpublic personal information. Employees and agents are trained on their responsibilities to protect our clients' personal information and are required to use secure passwords and encryption to store and transmit client data. Employees may access your information only when it is appropriate to do so, such as to administer products or services. Failure to adhere to our established privacy and

security policies may subject employees to disciplinary action, including termination of employment. You may have additional rights under state laws. Please contact us for further information regarding our Privacy Policy. We reserve the right to change our Privacy Policy.

Cybersecurity

Galapagos has in place policies and procedures regarding information technology security, maintains appropriate technical and physical safeguards, and takes other reasonable precautions to safeguard the confidentiality of sensitive information and internal data. However, despite reasonable precautions, the risk remains that cybersecurity incidents may occur that may result in the inadvertent disclosure of confidential sensitive information to unintended parties, unauthorized access to confidential sensitive information, or operational disruptions by malicious hackers. If such an event were to occur, Galapagos would promptly notify the affected parties and take all necessary appropriate actions as required by state and federal law.

Business Continuity/Business Disruption

Galapagos has established a Business Continuity/Business Disruption plan to manage the effects of a significant business disruption. Although our Business Continuity/Business Disruption plan is reasonably designed to allow us to operate during an emergency business disruption, due to the unpredictability of such events, we have no control over damage to infrastructure that may impact our access to reliable power sources, communication networks, or transportation and affect our ability to resume business operations. Our clients have access at all times to their accounts maintained at their custodian financial institutions.

Additional Information

Galapagos is a U.S. Securities and Exchange Commission ("SEC") -registered investment advisor located in Miami, Florida. Registration as an investment advisor does not imply any level of skill or training. For additional information, please refer to Galapagos' Form CRS (Client Relationship Summary) and Form ADV Part 2A Brochure, which are filed with the SEC and are available by contacting us at compliance.intl@galapagoscitizen.com, or on the SEC's Investment Advisor Public Disclosure website www.adviserinfo.sec.gov.