

Privacy Policy – Galapagos Advisory SA

Introduction

Galapagos Advisory SA (hereinafter referred to as "Galapagos" or "we") values your privacy and is committed to protecting your personal data in accordance with the Swiss Federal Act on Data Protection (FADP) and other applicable regulations.

Definitions

Personal data refers to any information relating to an identified or identifiable natural person. Data processing means any operation performed on personal data, such as collection, storage, use, disclosure, or deletion.

Purposes of Data Processing

We collect and process personal data to:

- Provide our portfolio management and investment advisory services;
- Fulfill legal and regulatory obligations;
- Maintain client relationships;
- Ensure the security of our operations;
- Perform administrative and operational functions within the Galapagos Group.

Categories of Personal Data

Depending on the context, we may collect:

- Identification and contact data (e.g., name, address, phone number, email);
- Client information (e.g., date of birth, nationality, marital status, profession);
- Risk management data (e.g., creditworthiness, regulatory data);
- Financial data (e.g., bank account details);
- Mandate-related data (e.g., contracts, tax information);
- Website usage data (e.g., IP address, browser information).

Source of Data

We collect personal data primarily directly from our clients. We may also receive personal data indirectly from third parties, such as custodians, banks, or business partners, where legally permitted.

Data Sharing

Personal data may be shared with:

- Entities within the Galapagos Group (Switzerland, Brazil, USA);
- Third-party service providers and partners under confidentiality agreements;
- Authorities and regulators, when required by law.

International Data Transfers

Data may be transferred to countries outside Switzerland, including Brazil and, in exceptional cases, the United States. Transfers to non-adequate jurisdictions, such as

the USA, occur only with appropriate safeguards in place and based on the client's explicit consent.

Data Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or misuse.

Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal and regulatory obligations.

Your Rights

Under applicable data protection laws, you have the right to:

- Access your personal data;
- Request correction or deletion;
- Object to or restrict data processing;
- Request data portability (where applicable).

Contact

For any questions regarding this Privacy Policy or to exercise your data protection rights, please contact:

Galapagos Advisory SA

Rue du Mont-Blanc 7, 1201 Geneva, Switzerland

Email: andrea.barbosa@galapagoscapital.ch

This Privacy Policy may be updated periodically. We encourage you to review it regularly to stay informed about how we protect your data.