Galatia Privacy Policy

Last updated: July 12, 2026

This Privacy Policy is part of the Galatia Terms of Service at

https://galatia.com/legal/Galatia%20-%20Terms%20of%20Service.pdf. All terms, conditions, and terminology are consistent with the Terms of Service, and the Terms of Service are incorporated into this document by reference. This policy governs the use of the Galatia website at https://galatia.com and the associated tools and services, including https://galatia.com/arena. Collectively, the website and the associated tools and services are referred to as the "Services" in these terms. The operator may offer other products and services. The Services do not include outside websites or platforms which may be linked or interconnected to the Services. Such outside platforms may have their own terms of service, which control for all transactions on such platforms. Galatia Org LLC, a Delaware limited liability company, operates the Services. It and its affiliates are referred to in this document as the "operator," "we," or "us."

The Blockchain

Blockchain technology, also known as distributed ledger technology (or simply 'DLT'), is at the core of our business. Blockchains are decentralized and made up of digitally recorded data in a chain of packages called 'blocks'. The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several 'nodes' which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralized place where it is located either. This means that by design, a blockchain's records cannot be changed or deleted and is said to be 'immutable'. This may affect your ability to exercise your rights such as your right to erasure ('right to be forgotten'), or your rights to object or restrict processing, of your personal data. Data on the blockchain can't be erased or changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted. In certain circumstances, in order to comply with our contractual obligations to you (such as delivery of tokens) it will be necessary to write certain personal data, such as your wallet address, onto the blockchain; this requires you to execute such transactions using your wallet's private key. In most cases ultimate decisions to (i) transact on the blockchain using your wallet address, as well as (ii) share the public key relating to your wallet address with anyone (including us) rests with you.

If you want to ensure your privacy rights are not affected in any way, you should not transact on blockchains as certain rights may not be fully available or exercisable by you or us due to the technological infrastructure of the blockchain. The blockchain is available to the public and any personal data shared on the blockchain will become publicly available.

Individuals under the Age of 18

As per our Terms of Service, individuals under the age of 18 are not permitted to use the Services. As such, we do not knowingly collect, solicit or maintain personal data from anyone under the age of 18 or knowingly allow such persons to register for the Services. In the event that we learn that we have collected personal data from an individual under age 18, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns. If you are a parent or guardian and you are aware that your child has provided personal data to the Services, please contact us so that we may remove such data. Note that we cannot delete information stored on public cryptographic blockchains.

Collecting

Things you and others do and provide. •

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Information and content you provide. We collect the content, communications and other information you provide when you use our Services, including when you create an account, initiate the use of the Services, create or share content, and message or communicate with others. This information may include, but is not limited to: •

Name

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Address

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Email

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Phone Number

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SSN (or equivalent)

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Financial Information

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Date of Birth

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Citizenship

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Payment Information

Information used to verify your identity. If required to help us verify your identity, you may provide us a copy of your driver's license, passport or other government issued ID. If required to help us verify your residence, you may provide us with a utility bill, lease or other proof of residence. You may also provide us other verification documents, such as bank statements reflecting the source of funds, to meet U.S. Bank Secrecy Act or antimoney laundering laws, US Treasury department rules or regulations or other legal requirements. If you seek to invest through an entity or corporation, you may provide us

with documentation relating to the entity's jurisdiction of formation, legal status and ownership. By providing the verification information and documents mentioned above, you also provide us information within those records, which may include characteristics of protected classifications like your sex, age, national origin, and citizenship. •

Financial information. In order to transfer funds, you may need to provide us and our third-party financial providers or partners with certain account and other payment information, such as information needed to make payment via ACH, wire, electronic checks, cryptocurrency, foreign currency or any other payment methods. You may agree to your personal and financial information being transferred, stored, and processed by such third parties in accordance with their respective privacy policies.

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Your usage. We collect information about how you use our Services, such as the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; and the time, frequency, and duration of your activities.

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Information about transactions made on our Services. If you use our Services for transactions of any kind, we collect information about them.

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Things others do and information they provide about you. We also receive and analyze content, communications, and information that other people provide when they use our Services.

Cookies

We, and our partners, use cookies and similar technologies to give you the best possible content and experience. Cookies are used to remember you and to collect information about how you interact with the Services. If you have an account with the Services, we may link this usage data with other information. You may have the option to either accept or refuse these cookies. If you choose to refuse, you may not be able to use some portions of the Services.

Device Information

As described below, we collect information from and about the computers, phones, and other web-connected devices you use that interact with our Services, and we combine this information across different devices you use. Information we obtain from these devices includes: •

Device attributes: information such as the operating system, hardware and software versions, browser type, app and file names and types, and plugins.

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Device operations: information about operations and behaviors performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).

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Identifiers: unique identifiers, device IDs, and other identifiers.

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Data from device settings: information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.

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Network and connections: information such as the name of your mobile operator or ISP, language, time zone, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network.

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Cookie data: data from cookies stored on your device, including cookie IDs and settings.

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Information necessary to enable push notifications: if you enable push notifications in

our services, we will collect information from your device as may be necessary to enable such notifications

Information from partners. •

The Services use Google Analytics and other Google services to gather information about

the computers and devices that connect to them. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

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See the "Third-Party Data Collection" section for additional information on third-party

collection of data.

When using the Services

When using the Services, we may collect and process personal data. The data will be stored in different instances. We collect and use this information to provide you the Services and to debug issues and provide support. 1. On the Blockchain the following data may be stored: • addresses of externally owned accounts •

transactions made; and

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token balances.

The data will be stored on the Blockchain. Given the technological design of the blockchain, this data will become public and it will not likely be possible to delete or change the data at any given time. 2. In our web servers, we will store the following data: • addresses of externally owned accounts; and •

transactions made.

3. Log Data • the Internet protocol address ("IP address"); and •

transaction id/ Hash.

Tracking and Uses

We use the information we have (subject to choices you make) as described below and to provide and support the Services. Here's how:

Provide, personalize and improve our Services. We use the information we have to deliver our Services, including to personalize features and content. •

Information across devices: We connect information about your activities on different

devices to provide a more tailored and consistent experience.

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Product research and development: We use the information we have to develop, test and improve our Services, including by conducting surveys and research, and testing and troubleshooting new products and features.

Provide measurement, analytics, and other business services. The Services use Google Analytics to gather information about their use. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. The Services use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information.

Promote safety, integrity and security. We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Services, and promote safety and security.

Communicate with you. We use the information we have to send you marketing communications, communicate with you about our Services, and let you know about our policies and terms. We also use your information to respond to you when you contact us. Because recognition of the Do Not Track HTTP header feature of your web browser is not standardized, the Services don’t recognize it for tracking purposes.

Retention

The Services may keep the information we gather about you an unlimited length of time. To request that information collected about you be deleted, please contact us at the email provided in this policy. A valid request must include sufficient information to identify your personal data. Note that we cannot delete information stored on public cryptographic blockchains.

Sharing

The Services only share information about you with others as follows:

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We employ other companies to perform functions on our behalf, such as service providers that assist in the administration of the Services and our advertising and marketing efforts, identity verification services, data analytics companies that help us target our offerings, marketing partners, and payment providers. We may need to share your information with these companies. These partners may access this information so long as you have an account on the Services.

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We may also transfer your personal data to a third party as a result of a business

combination, merger, asset sale, reorganization or similar transaction or to governmental authorities when we reasonably believe it is required by law or appropriate to respond to legal process.

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We will also share your information with third-party companies, organizations or individuals if we have a good faith belief that access, use, preservation or disclosure of your information is reasonably necessary to detect or protect against fraud or security issues, enforce our terms of use, meet any enforceable government request, defend against legal claims or protect against harm our legal rights or safety. In any such event, and to the extent legally permitted, we will notify you and, if there are material changes in relation to the processing of your data, give you an opportunity to consent to such changes. Any third party with whom we share your data with will be required to provide the same or equal protection of such data as stated in our Privacy Policy.

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To operate the Services, we share information about you as needed with our service providers, including financial institutions, accountants, auditors, lawyers, payment processors, information technology consultants, advisors, and our affiliates. We only share information to the extent it is required to fulfill our obligations to you and to regulators, and to operate the Services. The information is only shared so long as you are have an account on the Services.

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We routinely share information with companies closely related to us – our "affiliates" –

for certain purposes under this policy. Our affiliates will be entitled to enjoy our rights under this Privacy Policy and we will be responsible for our affiliates' conduct related thereto.

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We may share information about you with US, state or international regulators, SEC, or FINRA where we believe doing so is required or appropriate to comply with any laws, regulations or other legal processes or law enforcement requests, such as court orders, search warrants, or subpoenas.

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The Services may contain links to third party websites and may redirect you to third party

websites. These sites include, among others, service providers who have a relationship with the operator. Third party websites are not under our control, and we are not responsible for any third party websites, or the accuracy, sufficiency, correctness, reliability, veracity, completeness, or timeliness of their information, links, changes or updates. The inclusion or access to these websites does not imply an endorsement by the operator, or of the provider of such content or services, or of any third party website. Please be aware that when you enter a third party website, any information you provide,

including financial information, is subject to the terms of use and privacy policy of that website.

Opt–Out

If you wish to stop receiving marketing or promotional communications or to opt out of use of your information for the purposes described in this policy, please follow the opt-out instructions, such as clicking “Unsubscribe” (or similar opt-out language), in those communications. You can also contact us at hello@galatia.com to opt out. Despite your indicated email preferences, we may send you service-related communications, including notices of any updates to our terms of service or this policy. Please understand that you will not be allowed to opt–out of certain communications required to comply with applicable laws, rules and regulations or other legal and related notices concerning your relationship to the Services.

Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Contact

If you have comments or questions about the privacy policies of the Services, contact hello@galatia.com.

Changes

The Services may change their privacy policy at any time. Check this page for the latest.

CCPA Addendum – Compliance

You agree to do your respective parts to comply with the California Consumer Privacy Act and its regulations, consistent with the operator’s role as a “service provider”, and not as a “third party”, under that law.

Cooperation

Whenever it is feasible and legal to do so, both the operator and You will give the other prompt notice of user rights requests, regulatory inquiries, and other communications under the California Consumer Privacy Act. Both sides agree to cooperate in good faith to respond to and honor such communications, and to meet other obligations under the California Consumer Privacy Act.

Prohibitions

The operator may not:

- sell personal information collected from consumers covered by the California Consumer Privacy Act that You disclose to the operator
- retain, use, or disclose such information for any purpose other than for the specific purpose of performing the services in the Terms of Service, including retaining, using, or disclosing such information for a commercial purpose other than providing the services Terms of Service
- retain, use, or disclose such information outside of a direct business relationship between the operator and You

Certification

The operator understands the restrictions in Prohibitions and will comply with them.

Minimization

Both You and the operator agree to limit use of personal information covered by the California Consumer Privacy Act to that reasonably necessary and proportionate to achieve the purpose of the Terms of Service, consistent with the meaning of "business purpose" under that law.

Subcontracting

The operator agrees to ensure that each subcontractor that processes Your information covered by the California Consumer Privacy Act will also qualify as a "service provider", and not as a "third party", under that law.

Personal Information

Of the following categories of personal information: • identifiers (such as contact information, government IDs, cookies, etc.), •

information protected against security breaches (such as your name and financial account, driver's license, social security number, user name and password, health/medical information),

- protected classification information (like race, gender, ethnicity, etc.),
- other information, including commercial information, Internet/electronic activity, geolocation, audio/video data, professional or employment related information, education information, biometrics, and inferences from the foregoing;

The operator has collected and used for a business purpose such data within the last 12 months. The operator has not sold or disclosed any such data within the last 12 months, as of the date of this agreement.

Previously Submitted Information

To request access or changes to information previously submitted, please contact the operator at the address provided above (under the "Contact" heading).

Conflicts

If the terms of this addendum conflict with terms of the Terms of Service or Privacy Policy, the terms of this addendum take precedence.

GDPR / EU Addendum

Transferring Your data outside of the EU

The data mentioned in this document will be stored in the United States. But, when interacting with the blockchain, as explained above in this Policy, the blockchain is a global decentralized public network and accordingly any personal data written onto the blockchain may be transferred and stored across the globe.

Your Rights as a Data Subject

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the European Commission's website.

Right Information and access

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source). This document provides that information, and you may contact us for additional information.

Right to rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information. The accuracy of your information is important to us. If you do not want us to use your Personal Information in the manner set out in this Privacy Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us at the above details.

Right to erasure (right to be 'forgotten')

You have the general right to request the erasure of your personal information in the following circumstances: o

the personal information is no longer necessary for the purpose for which it was collected;

o

you withdraw your consent to consent based processing and no other legal justification for processing applies;

o

you object to processing for direct marketing purposes;

o

we unlawfully processed your personal information; and

o

erasure is required to comply with a legal obligation that applies to us.

But, when interacting with the blockchain we may not be able to ensure that your personal data is deleted. This is because the blockchain is a public decentralized network and blockchain technology does not generally allow for data to be deleted and your right to erasure may not be able to be fully enforced. In these circumstances we will only be able to ensure that all personal data that is held by us is permanently deleted. We will proceed to comply with an erasure request without delay unless continued retention is necessary for: o

Exercising the right of freedom of expression and information;

o

Complying with a legal obligation under EU or other applicable law;

o

The performance of a task carried out in the public interest;

o

Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or

o

The establishment, exercise, or defense of legal claims.

Right to restrict processing and right to object to processing

You have a right to restrict processing of your personal information, such as where: o

you contest the accuracy of the personal information;

o

where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;

o

we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defense of legal claims.

You also have the right to object to processing of your personal information under certain

circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right. But, when interacting with the blockchain, as it is a public decentralized network, we will likely not be able to prevent external parties from processing any personal data which has been written onto the blockchain. In these circumstances we will use our reasonable endeavors to ensure that all processing of personal data held by us is restricted, notwithstanding this, your right to restrict to processing may not be able to be fully enforced.

Contact

If you have comments or questions about the privacy policies of the Services, contact hello@galatia.com.

Right to data portability

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to

entering into a contract, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

Right to freedom from automated decision-making

We do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

Right to object to direct marketing ('opting out')

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless: o

you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above)

o

you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details. Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our Services or as part of a contractual relationship we may have with you.

Right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

Raising a complaint about how we have handled your personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office in your jurisdiction.