



ADDITIONAL DISCLOSURE INFORMATION

Important Information about New Account Opening Procedures / Customer Identification Program (CIP)

The USA PATRIOT Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA PATRIOT Act requires financial institutions to obtain, verify and record information that identifies each person or entity with an account relationship at a financial institution.

If you are an individual and wish to open an account or have an account currently with Gamma Securities LLC or Gamma Asset Management LLC (collectively referred to as "GAMMA"), carry out transactions with GAMMA, or receive formal communications from GAMMA, GAMMA is required to collect the following information about you:

- Name,
- Date of birth,
- Address,
- Identification number:
 - U.S. citizen: taxpayer identification number (Social Security number or employer identification number), or
 - 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.

If you are a corporation, partnership, trust, or other entity that wishes to open an account or has an account currently with GAMMA, carries out transactions with GAMMA, or receives formal communications from GAMMA, then GAMMA will collect the following information about you:

- Name,
- Street address (either principal place of business, a local office or other physical location),
- a U.S. taxpayer identification number, or if not organized or a resident in the United States or filing U.S. income tax returns, the number and country of issuance of any other government-issued document certifying the existence of the organization, and
- such other information or documents that we consider necessary to verify the entity's identity (examples of additional information include articles of incorporation, a

government-issued business license, a partnership agreement, or a trust instrument. We may also verify the entity's identity through other means).

If the above information is not provided, GAMMA will not be able to open an account for you, maintain an account for you, carry out transactions for you, or distribute formal communication to you. If GAMMA has already opened an account for you, such account may need to be closed if the above information is not complete.

Business Continuity Planning

GAMMA has an established Business Continuity Plan ("BCP") that includes systems and procedures for backup and recovery of mission critical systems / data, alternate communications with customers / employees and alternate physical locations. GAMMA's BCP is designed to address the effects of various significant business disruptions ("SBDs"), whether internal (e.g., affecting a GAMMA building) or external (e.g., affecting a business district, city or region in which GAMMA conducts business), that may be caused by several foreseeable scenarios. GAMMA's BCP includes a crisis management framework as well as a contingency site and plans to address both internal and external SBDs. All GAMMA's operational facilities are equipped for resumption of business. Regarding all circumstances within our control, GAMMA's recovery time objective for business resumption is within six (6) hours, depending upon the availability of external resources.

GAMMA's policy is to respond to all SBDs by focusing on:

- Safeguarding employees' lives.
- Safeguarding customer assets.
- Safeguarding GAMMA's property.
- Making timely and prudent financial and operational assessments.
- Quickly recovering and resuming essential business operations within hours, and if not feasible, the next business day.
- Protecting GAMMA's books and records, and
- Allowing GAMMA's customers to transact business.

If you would like a copy of the full plan, please contact:

Name: David Galarza Sosa

Title: Chief Compliance & Legal Officer

Address: Ochoa Building, 500 De La Tanca Street Suite 305 San Juan, PR 00901-1969.

Phone: (787) 957-3260 ext. 130

Complaints

Complaints concerning services provided by GAMMA may be directed to:

Name: David Galarza Sosa

Title: Chief Compliance & Legal Officer

Address: Ochoa Building, 500 De La Tanca Street Suite 305 San Juan, PR 00901-1969.

Phone: (787) 957-3260 ext. 130

Confidentiality

GAMMA's policy is to maintain the confidentiality of client order and transaction information. Please be assured that GAMMA has strict policies and procedures in place on confidentiality of client information, as well as sophisticated and secure operational technology to provide superior protection of our clients' information.

GAMMA's Privacy Policy

The Gramm-Leach Bliley Act and SEC Regulation S-P require GAMMA to disclose its privacy policy.

Types of Nonpublic Personal Information We Collect:

We collect nonpublic personal information about you that is either provided to us by you or has previously been provided to one of our affiliates by you or obtained by us with your authorization.

Parties to Whom We Disclose Information:

For current and former clients, we do not disclose any nonpublic personal information obtained during our business or from our affiliates except as required or permitted by applicable law, rule or regulation. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared. GAMMA may also share information with its affiliates.

Protecting the Confidentiality and Security of Current and Former Client's Information:

We retain records relating to services that we provide so that we are better able to assist you with your needs and in some cases, to comply with professional guidelines or applicable law, rule or regulation. To guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards.

Should you wish to opt out of our information sharing, or have any other questions about this communication, please contact:

Name: David Galarza Sosa

Title: Chief Compliance & Legal Officer

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