U.S. PRIVACY POLICY

Griffin Global Asset Management ("Griffin," the "Company," "we," "us," or "our") is committed to protecting the privacy and security of your Personal Information (as defined below). This Privacy Policy explains how we collect use, disclose, safeguard, and otherwise process your Personal Information in compliance with applicable U.S. data privacy laws, including the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA").

This Privacy Policy applies to our processing of personal data in the context of our activities in the United States. If you are in the European Union or the European Economic Area, please see our privacy policy for the EU/EEA, [link].

Our Processing of Personal Information

"Personal Information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. For example, it could include your name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other Personal Information that could create a profile about your preferences and characteristics.

Griffin does not sell, rent, or trade Personal Information to or with third parties. Nor do we share Personal Information for cross-contextual behavioral advertising.

We may disclose your Personal Information as set forth in this Privacy Policy. Under applicable laws, you have the right to request and obtain information from us about our disclosure or use of your Personal Information as further described below.

Collection of Your Personal Information

We may collect or obtain your Personal Information in the following ways:

- Automatically when you visit and interact with our website, www.griffingam.com, or any affiliated websites (collectively, the "Site");
- Directly from you (e.g., when you contact us via email, phone, or mail);
- In the course of our regular business activities, including the leasing, sale, or purchase of aircraft;
- In connection with investor conference calls;
- When you apply for a job or position with us;
- From Griffin's commercial counterparties; and
- From other sources (*e.g.*, background checks, identity verification, law enforcement and regulatory authorities, etc.).

We collect your geolocation data, such as the state or country associated with your IP address, automatically when you visit our Site. Please see the section of this Privacy Policy on Cookies for further information.

Our Site and business activities are not directed at children. We do not knowingly collect Personal Information from children, including those below the age of 16.

Categories of Personal Information We May Collect and Process

The Personal Information we may collect and process about you includes:

- Identification Data: Names, phone numbers, mailing addresses, email addresses, additional contact details, job titles, organization, gender, date of birth, and identifiers (*e.g.*, passport numbers, driver license numbers, social security numbers, tax IDs, and user IDs);
- Third Party Data: Personal Information received from counterparties or clients in respect of their business and/or services, which may include Personal Information of their staff, customers, and others; and
- Job Application and Employment Data: We collect Personal Information from prospective employees, employees, freelancers and other independent contractors, contract workers, and partners to manage and evaluate job applications and employment offers.

Sensitive Personal Information

In the event that we collect or obtain Personal Information that divulges the following:

- Personal identification numbers, including social security, driver's license, passport, or state ID card numbers;
- Account or debit or credit card numbers combined with passwords or codes that would enable access to the accounts;
- Your exact geolocation;
- Your racial origin, religious beliefs, or union membership;
- Your genetic data, such as DNA samples;
- Biometric data that identifies you; or
- Information concerning your health or sexual orientation;

we will process such information in accordance with applicable data privacy law and only as necessary and proportionate to (a) conduct business activities on behalf of the Company or (b) comply with legal requirements.

Purposes of Processing

We may process your Personal Information for various purposes, including:

- To permit access, use and improvement of our Site;

- To respond to a request for information we receive from you;
- To comply with our compliance, legal and regulatory obligations, such as for anti-money laundering compliance, know your customer laws, financial and credit checks, audit requirements, fraud and crime prevention and detection, and record keeping;
- To protect the security of and manage access to our premises, IT and communication systems, online platforms, Site, and other systems, including preventing and detecting security threats, fraud, or other criminal or malicious activities;
- To help us manage health and safety risks to employees and visitors to our offices;
- To carry-out recruitment activities and manage employment applications;
- To comply with any inquiry, subpoena, court order, or other legal or regulatory process or procedures;
- To investigate, establish and/or protect the Company's legal rights, property, or safety, or the rights, property, or safety of others, to bring and/or defend against legal claims, to facilitate the seeking of external legal advice;
- To operate and manage the business of the Company, including our commercial aviation leasing and asset management business, and our relationships with airlines, OEMs, financial institutions and other financiers, lessors, vendors, third-party suppliers, insurers, landlords and managing agents, advisors, consultants, and other professionals;
- To facilitate the expansion, opening, closing, or moving of Company offices or a merger, acquisition, or restructuring of the Company; and
- To conduct other business activities of the Company, as needed.

Within the past 12 months, we collected the following categories of Personal Information about individuals. The specific pieces of Personal Information we collected about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category of Information Collected	**Source**	**Business Purpose**
Identification Data, such as names, phone numbers, mailing addresses, email addresses, job titles, organization, gender, date of birth, identifiers (*e.g.*, passport numbers, driver's license, social security numbers, tax IDs, user IDs), IP address, mobile device id, and/or other online identifiers.	Directly from you; From publicly available sources; or Information received from third parties in connection with our regular business activities or your employment with us.	Communicating with you; To administer or otherwise perform obligations in relation to any agreement or contract to which we are a party; To address compliance and legal obligations, such as prevention of fraud/money laundering; To respond to queries or requests; To protect our rights and meet our legal obligations; To provide for internal business administration and operations, including troubleshooting, Site customization, enhancement or development, testing, research,

		administration and operation of our Site and data analytics; To comply with Company financial responsibilities (audit, accounting, and tax requirements); In connection with hiring and employment; and/or As permitted or required by law, or as we may notify you.
Any categories of Personal Information described in subdivision CCPA Section 1798.80(e).	See above.	See above.
Geolocation data, such as the state or country associated with your IP address.	Automatically when you visit our Site.	To provide for internal business administration and operations, including troubleshooting, Site customization, enhancement or development, testing, research, administration and operation of our Site and data analytics; and/or To keep our Site safe and secure.
Financial Data, such as account information, billing address, payment method; invoice records; payment records; payment amount; payment date; and records of checks.	Directly from you or from third parties.	To administer or otherwise perform our obligations in relation to any agreement to which we are a party; and/or In connection with employment and payroll practices.

Disclosure of Your Personal Information

We may share your Personal Information with others for legitimate business purposes in accordance with applicable legal requirements.

In accordance with the requirements of applicable data privacy law, and/or when it is otherwise appropriate, we safeguard your Personal Information by entering into written agreements with the service providers, contractors, or third parties with whom we share or disclose your Personal Information.

We may disclose, share, or transfer your Personal Information to others as follows:

- As directed or instructed by you;
- To alert certain individuals that you have opted out of the sharing of your Personal Information or that you have limited the use of your Sensitive Personal Information;

- Our affiliates, subsidiaries, or group companies for business-related purposes, including the running of global processes, group wide reporting, or decisions about hiring or promotion;
- A third party as part of a merger, acquisition, bankruptcy, or other transaction in which a third party assumes control of all or part of the business (in such circumstances, we may transfer your Personal Information to such third party as an asset);
- Potential purchasers or bidders, including their representatives and advisors;
- In the course of our regular business activities, when it becomes necessary to share such information with third parties, such as investors, purchasers or sellers, Government departments, agencies, and regulatory bodies to whom we are obliged or required to disclose information;
- Service providers, contractors or third parties who assist us in the administration, processing and management of certain business activities pertaining to past, current and prospective employees;
- Individuals or companies employed by the Company to conduct specific services, functions, or consultancy work, including external reference agencies and other financial institutions, as well as representatives and other professional advisors;
- Relatives or legal representatives of past, current and prospective employees, including, among other individuals, to those who are listed as emergency contacts or beneficiaries;
- Insurance or assurance companies, health insurance providers or trade unions; legal and medical practitioners, pension providers;
- Government departments, agencies, and regulatory bodies to whom we are obliged or required to disclose information; and
- Other support service providers necessary to assist the Company with any of the above.

Your Data Protection Rights

You have certain rights which you may exercise independently or through an authorized agent. Those rights include:

- *The right to know about the Personal Information a business collects about you and how it is used and shared*: You have the right to request that we disclose to you what Personal Information we have collected, used, or shared about you, and why we collected, used, or shared that information. We will provide you this requested information, free of charge, for the 12-month period preceding your request. Specifically, you may request that we disclose:
    - The categories of Personal Information collected;
    - Specific pieces of Personal Information collected;
    - The categories of sources from which we collected Personal Information;
    - The purposes for which we use the Personal Information;
    - The categories of third parties with whom we share the Personal Information; and
    - The categories of information that we sell or disclose to third parties.
- *The right to delete Personal Information collected from you (with some exceptions)*: You may request that we delete Personal Information we collected from you and to tell our service providers to do the same.

- *The right to opt-out of the sale of your Personal Information*: While you may have this right under applicable law, please note that we do not sell your Personal Information or share your Personal Information for cross-context behavioral advertising.
- *The right to non-discrimination for exercising your rights*: We will not discriminate against you for exercising your privacy rights.
- *The right to correct inaccurate information*: You have the right to request that we correct your Personal Information if it is inaccurate.
- *The right to limit the use and disclosure of Sensitive Personal Information*: You have the right to direct us to limit the use or disclosure of your Sensitive Personal Information.
- *The right to opt-out of automated decision-making technology*: You have the right to opt out of our use, if any, of automated decision-making technology, including "profiling," in connection with decisions related to your work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

Exercising Your Rights to Know or Delete or Correct

If you would like to exercise any of your rights or have any questions about this section, please submit your request in writing by emailing us at tmaccary@griffingam.com. You can also write to us at:

Griffin Global Asset Management
Attn: Stephen Lennon
Head of Legal
Sixth Floor, Block 2, Fibonacci Square,
Ballsbridge, Dublin 4,
D04 X5A0, Ireland

You have the right to designate an authorized agent to submit a request on your behalf by providing that agent with your written permission and providing us with a copy of such written permission.

Your request to know or delete Personal Information must provide information sufficient to allow us to reasonably verify that you are the person about whom we collected the Personal Information or that person's authorized representative. Your request must also contain sufficient detail to allow us to properly understand, evaluate, and respond to it. To the extent you provide Personal Information with your request, we will use that Personal Information only to verify your identity or authority to make the request and as necessary to track and document requests and responses, unless you also provided the Personal Information to us for another purpose.

If we cannot comply with a request for any reason, we will explain the reasons in our response. We may deny your request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction or legal matter for which we collected the Personal Information, take actions reasonably anticipated within the context of our ongoing business or legal relationship with you or a client, or otherwise perform our contract with you;
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which the information was provided to us.

Please note that we are not required to delete Personal Information about an individual that was not collected directly from that individual.

Any requests that can be processed by us will be responded to in no more than 45 days from the date we receive your request, unless we notify you that an extension is required. In case of an extended completion period, we will process the request in no more than 90 days from the date of the original request. You are limited to two requests to know/access your Personal Information within a 12-month period.

Retention Period

Please note that we retain Personal Information for as long as is reasonably necessary in connection with the purposes for which the Personal Information was collected.

Other Privacy Rights

You may request and obtain from us, once a year and free of charge, information about categories of Personal Information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared Personal Information in the immediately preceding calendar year. If you would like to make such a request, please submit your request in writing to us using the contact information provided above.

Cookies

Cookies are small text files that are stored on your computer and are used to collect information that allows us to understand how users interact with our Site. We use necessary or essential cookies to help make our Site usable. These cookies enable basic functions such as page navigation and security features. They also enable the Site to remember your consent preferences. We use Google Analytics to collect data about your visits to this Site, such as page views and time on the Site. This data allows us to understand how visitors use our website, and to improve our service and provide you with the best experience. We do not use Google Analytics to personally identify individual visitors to the Site.

In particular, we use the following cookies:

Google:

- _ga_*: 1 year: stores and counts pageviews
- _ga: 1 year: distinguishes users
- _gid: 1 day: distinguishes users
- _gat_gtag_UA_*: 1 minute: stores a user ID

Calendly:

- _cfuvid: session: distinguishes users

When you visit the Site, you may choose to opt-out of certain cookies by exercising (or changing) your consent preferences. In addition, all recent versions of popular browsers give users a level of control over cookies. You can set your browser to accept, reject, or disable cookies, or to prompt you each time a cookie is offered. You can also delete cookies that are stored on your device using your browsing settings and preferences.

It is not possible for us to provide instructions for every browser for every type of device. The best advice is to consult the browser publishers' websites or your browser's "Help" menu for further instructions regarding cookies. If, however, you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly. Please note, as well, that browser-management tools for cookies are outside of our control and we cannot guarantee their effectiveness.

Updates to this Privacy Policy

We may update this Privacy Policy at any time or as required by applicable laws or regulations. We will make an updated copy of such Privacy Policy available on our Site. Please check our Site regularly for any changes or updates.

(Last updated: Nov 10, 2026)