EU/EEA PRIVACY POLICY

Griffin Global Asset Management DAC (the "Company," "we," "us," or "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect use, disclose, safeguard, and otherwise process your personal data in compliance with applicable data protection laws, including the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

This Privacy Policy applies to our processing of personal data in the context of our activities within the European Union and the European Economic Area. If you are a resident of the United States, please see our privacy policy for the U.S., [link].

Our Processing of Personal Data

This Privacy Policy applies when we act as a "data controller" within the meaning of the GDPR. This means that we are responsible for deciding how we process your personal data.

As used in this Privacy Policy, "processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Personal data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Collection of Your Personal Data

We may collect or obtain your personal data 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 data from children, including those below the age of 16.

Categories of Personal Data We May Collect and Process

The personal data we 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, user IDs);
- Third Party Data: Personal data received from counterparties or clients in respect of their business and/or services, which may include personal data of their staff, customers, and others; and
- Job Application and Employment Data: We collect personal data from prospective employees, employees, freelancers and other independent contractors, contract workers, and partners to manage and evaluate job applications and employment offers.

We collect the following special categories of personal data only when (i) you give explicit consent to its processing, or (ii) such information is necessary or permitted to be collected by applicable law.

- 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.

Purposes of Processing

We may process your personal data 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, websites, 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 and 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.

Security and Storage of Personal Data

We maintain appropriate technical and organizational measures to protect your personal data against unlawful or unauthorized processing and the risks of accidental access, alteration, loss, or damage.

We have put in place appropriate security measures to protect your personal data from accidental or unlawful destruction, loss, or alteration, from unauthorized disclosure or access, and from risks related to the transmission, storage, or processing of your personal data.

We securely store your personal data in a centralized database, with controlled access to such database. Access to personal data (including special data) in both electronic and paper form is restricted to employees who have a legitimate and justifiable reason to view such data.

Third parties will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any data security breach and will notify you and any applicable regulator of a breach when we are legally required to do so.

We retain your personal data for as long as is reasonably necessary in connection with the purposes for which the personal data was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

Disclosure of Your Personal Data

We do not sell your personal data. We may share your personal data with others for legitimate business purposes in accordance with applicable law and subject to applicable requirements regarding confidentiality.

When required by applicable law or when it is otherwise appropriate, we safeguard your personal data by entering into written agreements with the third parties with whom we share it. Specifically, under the GDPR, we contract with third-party processors to ensure that they only process your personal data under our written instructions, that they protect the security and confidentiality of your personal data by implementing appropriate technical and organizational measures, and that they comply with other regulatory requirements.

We may share your personal data with third parties as follows:

- As directed or instructed by you;
- 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 data 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;
- Service providers, contractors or third parties who assist us in the administration, processing and management of certain 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, trade unions, legal and medical providers, 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.

International Transfers

We may transfer your personal data from the jurisdiction in which it is collected or located to other jurisdictions, including to other jurisdictions in which we have offices. In making any such transfer, we ensure that there is a legal basis for the transfer and appropriate safeguards in place.

Specifically, with respect to transfers of your personal data from the EU, EEA, Switzerland, or the United Kingdom to other jurisdictions, third countries and international organizations, we may rely on an adequacy decision issued by the EU Commission. We may use appropriate

safeguards, such as Standard Contractual Clauses. We may rely on derogations for specific situations, such as when the transfer is necessary for the establishment, exercise, or defense of legal claims or when you give us explicit consent after having been informed of the possible risks associated with the transfer.

Your Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following rights:

- *The right to access* - You have the right to request copies of your personal data from us.
- *The right to rectification* - You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete information you believe is incomplete.
- *The right to erasure* - You have the right to request that we erase your personal data, under certain conditions.
- *The right to restrict processing* - You have the right to request that we restrict the processing of your personal data, under certain conditions.
- *The right to object to processing* - You have the right to object to our processing of your personal data, under certain conditions.
- *The right to data portability* - You have the right to request that we transfer your personal data to another organization, or directly to you, under certain conditions.

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

To keep your personal data safe, if we cannot ascertain your identity or if we have reasonable doubts concerning your identity, then prior to processing your request, we may ask you to submit additional information for the purposes of verifying your identity.

You will not be charged or have to pay a fee to exercise your rights regarding your personal data, including your right to access your personal data, your rights to rectification or erasure of your personal data and your right to object to the processing of your personal data. However, if your request is manifestly unfounded or excessive, in particular because of its repetitive character, we may charge a reasonable fee or refuse your request.

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 Data Protection Commission.

Data Protection Commission
Email: info@dataprotection.ie
Address: 21 Fitzwilliam Square South
Dublin 2, D02 RD28

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, security features, and enabling 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 user ID

Calendly:

- _cfuvid: session: distinguishes users

When you visit the Site, you may 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)