

PRIVACY POLICY

Granite Crest Holdings LLC

Effective Date: March 14, 2026

Granite Crest Holdings LLC (“GCH,” “we,” “us,” or “our”) is committed to protecting the privacy of individuals who visit our website, contact us, or engage with us in connection with our real estate investment activities. This Privacy Policy explains how we collect, use, disclose, and safeguard information you provide to us, and describes your rights with respect to that information.

By accessing gchldgs.com or submitting information through our contact form or other communications, you acknowledge that you have read and understood this Privacy Policy.

1. INFORMATION WE COLLECT

We may collect the following categories of personal information:

Information You Provide Directly:

- Name, email address, phone number, and other contact information submitted through our inquiry form or via direct communication.
- Your stated role or relationship (e.g., prospective investor, broker, property owner, lender).
- Any message content or supplemental information you voluntarily provide.

Information Collected Automatically:

- IP address, browser type, operating system, and referring URLs collected via standard web server logs and analytics tools.
- Pages visited, time spent on site, and navigation patterns collected via cookies or similar tracking technologies.

Information from Third Parties:

- Business contact information provided by brokers, referral partners, or other third parties who refer to potential investors or deals to GCH.

2. HOW WE USE YOUR INFORMATION

GCH uses the information we collect for the following purposes:

- To respond to inquiries and communicate with prospective investors, brokers, and other parties who contact us.
- To evaluate potential investment opportunities submitted through our deal submission process.
- To send investor updates, deal announcements, or other materials to individuals who have expressed interest in GCH's investment activities, where permitted by law.
- To operate and improve our website and communications.

- To comply with legal and regulatory obligations, including applicable securities laws and anti-money laundering requirements.
- To protect the rights and safety of GCH, our partners, and the public.

We do not sell, rent, or trade your personal information to third parties for their marketing purposes.

3. LEGAL BASIS FOR PROCESSING

Where applicable law requires a legal basis for processing personal data, GCH relies on the following:

- Legitimate interests — to operate our business, respond to inquiries, and communicate with prospective partners.
- Consent — where you have expressly opted in to receive communications from us.
- Legal obligation — where processing is necessary to comply with applicable law.
- Contractual necessity — where processing is required to perform a contract or take pre-contractual steps at your request.

4. DISCLOSURE OF YOUR INFORMATION

GCH may share your information with the following categories of recipients:

- Service Providers: Third-party vendors who assist with website hosting, email delivery, CRM platforms, analytics, and other operational services, subject to appropriate confidentiality obligations.
- Legal and Regulatory Authorities: When required by law, court order, regulatory inquiry, or to protect GCH's legal rights.
- Business Transfers: In connection with a merger, acquisition, restructuring, or sale of all or a portion of GCH's assets, subject to standard confidentiality protections.
- Professional Advisors: Attorneys, accountants, and other advisors bound by professional confidentiality obligations.

We do not disclose your personal information to unaffiliated third parties for their independent commercial use without your consent.

5. ACCREDITED INVESTOR COMMUNICATIONS

GCH's investment opportunities are available only to accredited investors as defined under applicable securities laws. If you express interest in investing with GCH, we may request information to verify your accredited investor status. Such information is treated as strictly confidential and used solely for the purpose of evaluating your eligibility and facilitating potential investment transactions.

Communications related to investment opportunities are made in reliance on exemptions from registration under applicable securities laws and are not intended for public distribution.

6. COOKIES AND TRACKING TECHNOLOGIES

Our website may use cookies and similar technologies to enhance user experience and gather analytics data. You may configure your browser to refuse cookies or to alert you when cookies are being sent. Note that certain features of the site may not function properly if cookies are disabled.

We do not use cookies to serve targeted advertising or to track you across third-party websites.

7. DATA RETENTION

We retain personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, to comply with legal obligations, resolve disputes, and enforce our agreements. When personal information is no longer needed, we take reasonable steps to delete or anonymize it securely.

Inquiry and contact form data is generally retained for three (3) years from the date of collection, unless a longer retention period is required by law or by the nature of an ongoing business relationship.

8. DATA SECURITY

GCH implements reasonable administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, disclosure, alteration, or destruction. However, no method of transmission over the Internet or electronic storage is completely secure, and we cannot guarantee absolute security.

If you have reason to believe that your interaction with us is no longer secure, please contact us immediately at the address below.

9. YOUR RIGHTS

Depending on your jurisdiction, you may have certain rights with respect to your personal information, including the right to:

- Access — request a copy of the personal information we hold about you.
- Correction — request that inaccurate or incomplete information be corrected.
- Deletion — request that we delete your personal information, subject to legal retention requirements.
- Opt-Out — unsubscribe from marketing communications at any time by following the unsubscribe instructions included in our emails or by contacting us directly.
- Restriction — request that we restrict processing of your information in certain circumstances.

To exercise any of these rights, please contact us using the information provided in Section 11. We will respond to all requests within a reasonable time and in accordance with applicable law.

10. THIRD-PARTY LINKS

Our website may contain links to third-party websites. GCH is not responsible for the privacy practices or content of those sites. We encourage you to review the privacy policies of any third-party sites you visit.

11. CONTACT INFORMATION

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

Granite Crest Holdings LLC

Attention: Privacy Officer

Email: zacharyharris@granitecresthholdings.com

Phone: (410) 205-9485

Website: granitecresthholdings.com

12. CHANGES TO THIS PRIVACY POLICY

GCH reserves the right to update or modify this Privacy Policy at any time. We will post the revised policy on our website with an updated effective date. Your continued use of our website or engagement with GCH after changes are posted constitutes your acceptance of those changes. We encourage you to review this Privacy Policy periodically.

This Privacy Policy does not constitute an offer to sell or solicitation of an offer to buy any securities. Investment opportunities offered by Granite Crest Holdings LLC are available only to accredited investors and are subject to the terms of applicable offering documents. Past performance is not indicative of future results.