Graintree, LLC

Non-U.S. Privacy Policy

Effective Date: November 5, 2026

1. INTRODUCTION

This Non-U.S. Consumer Policy ("Policy") provides an overview of how Graintree, LLC and its affiliates and subsidiaries ("Graintree," "we," "our," or "us") collect and process Personal Data (as defined below), including information about our prospective, current and former clients ("you" or "your") in connection with our services ("Services").

2. UPDATES TO THIS POLICY

This Policy is subject to change and is updated periodically to comply with applicable laws and regulations. The Effective Date above indicates when this Policy was last revised. Changes are effective when we publish the revised Policy.

3. PERSONAL DATA WE COLLECT

"Personal Data" is information that identifies an individual or relates to an identifiable individual. Below are the categories and elements of Personal Data that we may collect from you or through the provision of the Services. Failure to provide the requested information may prevent us from providing the Services to you.

- **a. Identifiers**. These include information such as name, alias, postal or email address, date of birth, and mobile or landline telephone number.
- **b. Sensitive Data**. This includes information such as government-issued identification, social insurance numbers, individual credit, financial, income or account information, biometric data and information about your race, ethnicity, religion, disability information, criminal records and sanctions.
- **c. Professional or Employment Data**. This includes information such as your employer and employment status or position and work history.
- **d. Authentication Data**. Information such as Internet Protocol (IP) address, device identifier, username, geolocation data, identity verification data and manual or electronic signatures.
- **e. Engagement Data**. This includes information such as confirmation of attendance at in-person or virtual events, dietary requests (Note, religion, disability and health concerns may be inferred from a person's requests), surveys and photographs taken or video recordings made at such events
- **f. Technology and Usage Information**. This includes information such as means for identifying an individual by associating informational traces an individual leaves when using the Internet such as cookies, pixel tags, web beacons, locally stored objects, MAC/IP addresses, smart device information and mobile phone network information.
- **g. Legal Data**. This includes information such as filings with or orders from judiciary bodies regarding legal matters such as legal documents or decisions.

4. SOURCES OF PERSONAL DATA

We may collect Personal Data about you from a variety of sources, such as:

- **a. Directly from you**, including when you submit an application for credit or financing, complete forms, create or access an account, communicate with us, respond to requests for information,

provide supporting documentation, execute agreements, participate in surveys, or otherwise interact with us;

b. **From your representatives and authorized persons**, including loan applicants, co-borrowers, guarantors, beneficial owners, directors, officers, employees, agents, attorneys-in-fact, advisors, or other persons acting on your behalf;

c. **From our business partners and service providers**, including brokers, referral sources, originators, lenders, servicers, financial institutions, payment processors, identity verification providers, fraud prevention providers, data analytics providers, client support providers, and other vendors that support our business operations;

d. **From third parties involved in a transaction**, including counterparties, investors, purchasers or prospective purchasers of loans or receivables, participants, assignees, securitization parties, trustees, custodians, and professional advisors;

e. **From public sources**, including government agencies, regulatory authorities, courts, registries, corporate records, public databases, sanctions lists, watch lists, publicly available websites, and other publicly accessible sources;

f. **From Reporting and Verification Providers**, including consumer reporting agencies, credit bureaus, commercial credit reporting agencies, fraud prevention organizations, identity verification providers, background screening providers, and similar information providers, where permitted by applicable law**;**

g. **From authorized information providers**, including employers, financial institutions, accountants, legal advisors, tax advisors, and other organizations that you direct or authorize to provide information to us**;**

h. **Automatically through your use of our websites, applications, portals, systems, and electronic communications**, including through cookies, pixels, log files, device identifiers, and similar technologies, where permitted by applicable law and subject to any required consent; and

i. **From other lawful sources**, including affiliated companies, corporate groups, data providers, data aggregators, and other third parties from whom we obtain information in accordance with applicable law.

We may combine Personal Data collected from multiple sources to verify information, assess eligibility for products and services, manage risk, prevent fraud, comply with legal and regulatory obligations, service accounts, and operate our business.

5. PROCESSING ACTIVITIES

We may collect, use, store, organize, analyze, transmit, disclose, transfer, retain, and otherwise process Personal Data, as permitted by applicable law, for the following purposes:

a. **Providing Products and Services.** To review applications, originate, underwrite, fund, administer, service, restructure, renew, modify, transfer, participate, sell, assign, enforce, or otherwise manage loans, credit facilities, and related products and services.

b. **Client and Loan Management.** To establish and maintain accounts, verify identity, communicate with clients and prospective clients, provide client support, respond to inquiries, deliver notices and disclosures, process transactions, and maintain business records.

c. **Credit, Risk, and Underwriting Activities.** To assess creditworthiness, evaluate eligibility for financing, perform due diligence, analyze financial condition, verify information provided

to us, assess collateral, monitor credit exposure, manage portfolio risk, and make lending and investment decisions.

d. **Fraud Prevention and Security.** To detect, investigate, prevent, and respond to fraud, identity theft, financial crime, unauthorized transactions, cybersecurity incidents, suspicious activities, and other actual or suspected unlawful conduct.

e. **Regulatory Compliance.** To comply with applicable legal, regulatory, tax, accounting, reporting, licensing, audit, know-your-customer (KYC), anti-money laundering (AML), sanctions screening, anti-terrorist financing, consumer protection, recordkeeping, and other compliance obligations.

f. **Verification and Authentication.** To verify identity, authenticate users, validate information provided in connection with applications or transactions, conduct background and screening checks where permitted by law, and maintain the security and integrity of our systems and services.

g. **Servicing and Collections Activities.** To service loans and other obligations, process and collect payments, manage delinquencies, enforce contractual rights, resolve disputes, recover amounts owed, protect collateral, and pursue available remedies.

h. **Business Operations.** To operate, maintain, improve, troubleshoot, and administer our business, systems, websites, portals, applications, products, and services; conduct internal reporting, analytics, quality assurance, auditing, training, record management, and business planning activities.

i. **Transaction and Investment Activities.** To facilitate actual or proposed financings, participations, syndications, securitizations, assignments, sales, purchases, transfers, investments, mergers, acquisitions, reorganizations, asset transactions, financing arrangements, and other corporate transactions.

j. **Research, Analytics, and Product Development.** To perform data analysis, business analytics, modeling, testing, research, product development, service enhancement, and market analysis. Where appropriate, Personal Data may be aggregated, de-identified, anonymized, or otherwise processed in a form that does not identify an individual.

k. **Marketing and Communications.** To provide information regarding products, services, events, educational materials, industry developments, and other communications that may be of interest, subject to applicable legal requirements and any consent rights or preferences you have exercised.

l. **Protection of Rights and Interests.** To establish, exercise, or defend legal claims; protect our rights, property, safety, and security; protect the rights, property, safety, and security of our clients, business partners, and others; and enforce our agreements, policies, and legal rights.

m. **Other Disclosed Purposes.** To fulfill any other purpose disclosed to you at or before the time Personal Data is collected, authorized by you, or otherwise permitted or required by applicable law.

We may process Personal Data using automated and manual means and may combine Personal Data obtained from different sources for the purposes described in this Policy. We may also process Personal Data as necessary to perform a contract, comply with legal obligations, pursue legitimate business interests where permitted by applicable law, protect against fraud and security threats, protect vital interests, obtain consent where required, or otherwise rely on a lawful basis recognized under applicable privacy laws.

6. DISCLOSURE OF PERSONAL DATA

We may disclose, transmit, make available, share, transfer, or otherwise provide access to Personal Data to the following categories of recipients, as permitted by applicable law and for the purposes described in this Policy:

a. **Affiliates and Related Entities.** Our parent companies, subsidiaries, affiliates, portfolio companies, and other entities under common ownership or control for operational, administrative, risk management, compliance, servicing, reporting, and business purposes.

b. **Service Providers and Vendors.** Third parties that provide services on our behalf, including loan servicing providers, payment processors, cloud service providers, technology providers, data hosting providers, client support providers, identity verification providers, fraud prevention providers, data analytics providers, document management providers, auditors, consultants, and other professional service providers.

c. **Financial Institutions and Transaction Participants.** Banks, lenders, funding sources, investors, purchasers, prospective purchasers, assignees, participants, syndication partners, securitization parties, trustees, custodians, collateral agents, backup servicers, and other parties involved in the origination, funding, servicing, sale, participation, syndication, securitization, administration, or enforcement of a loan or other financial transaction.

d. **Credit and Verification Providers.** Consumer reporting agencies, commercial credit reporting agencies, credit bureaus, fraud prevention organizations, identity verification providers, sanctions screening providers, background screening providers, and similar organizations, where permitted by applicable law.

e. **Professional Advisors.** Attorneys, accountants, auditors, tax advisors, consultants, valuation firms, due diligence providers, and other professional advisors acting on our behalf or in connection with a transaction involving us.

f. **Government Authorities and Regulatory Bodies.** Courts, regulators, supervisory authorities, law enforcement agencies, tax authorities, governmental agencies, self-regulatory organizations, and other parties where disclosure is required or authorized by applicable law, regulation, legal process, court order, regulatory request, examination, investigation, or supervisory requirement.

g. **Persons Authorized by You.** Any person, organization, or representative that you authorize us to share Personal Data with, including co-borrowers, guarantors, beneficial owners, attorneys-in-fact, advisors, agents, or other representatives.

h. **Business Transaction Counterparties.** Actual or prospective buyers, sellers, investors, lenders, financing sources, merger partners, acquisition targets, and other participants in connection with a proposed or completed merger, acquisition, investment, financing, divestiture, restructuring, reorganization, sale of assets, sale of loans, or other corporate transaction.

i. **Protection of Rights and Security.** Third parties where we believe disclosure is necessary to protect our rights, property, security, systems, clients, personnel, business partners, or the rights, property, and safety of others; to prevent fraud or financial crime; or to establish, exercise, or defend legal claims.

We may also disclose Personal Data where we have obtained your consent or where such disclosure is otherwise permitted or required by applicable law.

7. DATA MINIMALIZATION

We collect, use, disclose, and retain Personal Data only where reasonably necessary, relevant, and proportionate to the legitimate business, legal, regulatory, fraud prevention, identity verification, servicing, client support, underwriting, credit assessment, and contractual purposes described in this Policy. We endeavor to collect the minimum amount of personal information necessary to accomplish those purposes

and do not intentionally collect personal information that is excessive, unnecessary, or unrelated to the services requested by you.

Where reasonably practicable, we use aggregated, anonymized, pseudonymized, or de-identified information instead of identifiable personal information. Access to personal information is limited to personnel, service providers, and authorized third parties who have a legitimate need to access such information in connection with the purposes described in this Policy.

8. DATA RETENTION

We retain Personal Data only for as long as reasonably necessary to fulfill the purposes for which it was collected, to comply with applicable legal, regulatory, audit, accounting, reporting, risk management, litigation hold, record retention, and enforcement requirements, or as otherwise permitted or required by law. Upon expiration of the applicable retention period, or when the information is no longer reasonably required, we will delete, destroy, anonymize, or de-identify such information using appropriate technical and organizational safeguards.

The length of time we retain Personal Data depends on the nature of the information, the purposes for which it was collected, applicable legal requirements, and our legitimate business needs. When Personal Data is no longer required for these purposes, we will take reasonable steps to delete, destroy, anonymize, de-identify, or otherwise dispose of the information in accordance with applicable law and our record retention policies.

In certain circumstances, we may retain Personal Data for longer periods where necessary to comply with legal obligations, respond to regulatory inquiries, prevent fraud, establish, exercise, or defend legal claims, enforce contractual rights, maintain business records, or otherwise as permitted or required by applicable law.

9. CONSUMER RIGHTS

Subject to the territorial and substantive scope of the relevant law and any applicable exceptions, exemptions or limitations, individuals may have certain rights regarding their Personal Data, including the right to:

- **a.** Request access to the Personal Data we maintain about them;
- **b.** Request information regarding how we collect, use, disclose, process, or transfer their Personal Data;
- **c.** Request correction, rectification, or updating of inaccurate, incomplete, or outdated Personal Data;
- **d.** Request deletion, erasure, anonymization, or de-identification of Personal Data in certain circumstances;
- **e.** Withdraw consent where our processing is based on consent, provided that such withdrawal will not affect the lawfulness of processing conducted before consent was withdrawn;
- **f.** Request that we restrict, suspend, limit, or object to certain processing activities, where permitted by applicable law;
- **g.** Request a copy of certain Personal Data in a portable or commonly used format, where such right applies;
- **h.** Request information regarding cross-border transfers of Personal Data, where required by applicable law; and
- **i.** Lodge a complaint with a competent privacy, data protection, or supervisory authority or other applicable regulatory body.

These rights are not absolute and may be limited by applicable law. For example, we may be unable to comply with a request to delete Personal Data where retaining or continuing to process Personal Data is necessary to comply with legal, regulatory, recordkeeping, fraud prevention, anti-money laundering, sanctions compliance, underwriting, servicing, collections, litigation, security, or other legitimate business obligations.

Individuals wishing to exercise their privacy rights may contact us using the contact information provided in this Policy. We may take reasonable steps to verify the identity and authority of a requestor before responding to a request. Where permitted by applicable law, an authorized representative may submit a request on behalf of an individual.

We will respond to privacy rights requests in accordance with applicable law and within the time periods required by applicable legal and regulatory requirements.

10. CROSS-BORDER TRANSFERS

As a U.S.-based organization, we may transfer, store, access, process, or disclose Personal Data in the United States and in other jurisdictions where we, our affiliates, service providers, business partners, investors, or transaction counterparties operate. As a result, Personal Data may be transferred to, processed in, or accessed from countries or regions whose privacy or data protection laws may differ from those of your country or region of residence.

Where required by applicable law, we will implement appropriate safeguards designed to protect Personal Data in connection with cross-border transfers, including contractual protections, data transfer agreements, security measures, internal policies, certifications, assessments, consent mechanisms, or other safeguards recognized under applicable law.

We may provide Personal Data to recipients located outside your country or region of residence for purposes including loan origination, underwriting, servicing, account administration, payment processing, fraud prevention, compliance, risk management, investor reporting, syndication, participation, securitization, business operations, and corporate transactions.

By interacting with us, applying for or obtaining products or services, or otherwise providing Personal Data to us, you acknowledge that your Personal Data may be processed, stored, and transferred as described in this Policy, subject to any rights and protections available to you under applicable law.

11. CONTACT CHANNELS

Questions and requests related to this Policy may be directed to privacy@graintree.com.