Privacy Policy

Granite Capital Wealth Management LLC

9681 Allison Circle, Huntington Beach, CA 92646 · (949) 556-5556 · www.teamgranite.com

Version 2.0

Dated 12 September 2026

WHAT THIS IS

Granite Capital Wealth Management LLC ("Granite", "we") is a California-registered investment adviser. This notice says what personal information we collect, why, who we share it with, how long we keep it, and how you can reach us. **We provide it when a relationship begins and every year afterwards.**

We do not sell your personal information, and we never have.

1 · WHOSE INFORMATION THIS IS ABOUT — AND WHY THAT IS UNUSUAL HERE

Granite serves two kinds of people, and most of our information is about the second kind.

- **Our own clients**, who contract with Granite directly.
- **The clients of introducing RIAs.** In the Defined Outcome Program **Granite is a sub-adviser**: the client contracts with their own adviser, and that adviser sends us what we need to manage the account. **We never contract with that person and never bill them.**

WE HOLD THEIR INFORMATION ANYWAY, SO THIS NOTICE COVERS THEM TOO. Not being somebody's adviser of record is not a reason to be casual with their data — and it is precisely the arrangement the 2023 policy could not describe, because it did not exist yet. RULING_2026-09-07_THE_SUB_ADVISER_MODEL.md is the one home for what the sub-advisory relationship is.

2 · WHAT WE COLLECT

From you, or from your adviser on your behalf: name, address, telephone, email, date of birth, Social Security or taxpayer number, account numbers, and the financial information needed to open and manage an account — assets, income, investment objectives, time horizon, liquidity needs, loss capacity, tax situation, and any restrictions you place on the account.

From your custodian and from executing brokers: account balances, positions, transactions, confirmations and statements.

Generated by us: the quotes, structures, tickets, allocations, fee calculations and records we create to run your account.

From our website and adviser portal: if you or your adviser use granite-adviser.onrender.com or teamgranite.com, we record ordinary web-server information — pages viewed, times, approximate location derived from the network address, and a marker stored in the browser so that repeat visits from the same browser can be recognised.

WE COLLECT ONLY WHAT WE NEED, AND THIS PARAGRAPH IS THE HONEST VERSION OF THAT CLAIM. A prospective adviser filling in our forms is asked for very little; we do not ask a prospect for a Social Security number, and the visit counter identifies a BROWSER, never a person by their network address.

3 · WHY WE COLLECT IT

To manage your account and produce your quotes and trades; to receive the sub-advisory fee the introducing adviser bills and remits to us; to communicate with you and your adviser; to keep the books and records the law requires; and to comply with tax-reporting, sanctions and other legal obligations that apply to Granite.

We do not use your information for marketing to you, and we do not sell it or rent it to anyone.

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4 · WHO WE SHARE IT WITH

- **Your own adviser** — for a sub-advised account, they are already your adviser of record.
- **Your custodian and executing brokers** — to open the account, place trades and settle them.
- **Our service providers** — portfolio, trading, document, email and hosting providers, and our accountants and lawyers. **Each is given only what it needs to do its job, and each is used under terms that restrict what it may USE your information FOR** — not merely a promise to keep it confidential. Those are different promises, and the second one on its own would let a provider keep your data secret while still using it for its own purposes. **Before Granite adds or changes a provider, the CCO checks four things**, because they are what lets us use a provider without asking you first: that the work is something Granite could lawfully do itself; that the **written terms forbid the provider using or disclosing your information for anything else**; that it gets **only what it needs**; and that **Granite is paid nothing for releasing it**. **Specifically barred: marketing, resale, unrelated analytics, advertising, and training unrelated products.** Granite uses these providers on their standard published terms and holds no negotiated contract with any of them.
- **Regulators, courts and law enforcement** — where the law requires it.
- **Anyone you tell us to**, in writing.

Our affiliates. Granite has **two**: **Keystone Advantage Fund, LLC**, a private fund the firm manages, and **Marathon Capital Management**, which Granite's Managing Member also owns. **WE DO NOT SHARE YOUR INFORMATION WITH EITHER OF THEM.** Your separately managed account, the Fund and Marathon are run separately; nothing about your account is used to market the Fund to you, and nothing about your account goes to Marathon.

AND NOWHERE ELSE EXCEPT AS THIS NOTICE DESCRIBES. We disclose your information only as set out in this section, as you direct us in writing, or as the law permits or requires. **Granite does not sell personal information for money, and does not let an unaffiliated firm use it for that firm's own marketing.** If that ever changes we will revise this notice first.

If Granite is ever sold, merged or transfers your account to another adviser, your information may pass to that firm so your account can continue to be managed. **We will tell you before that happens** and you may object.

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5 · IF A REPRESENTATIVE LEAVES

If an investment adviser representative leaves Granite for another firm, **they do not take your information with them unless you first say in writing that they may.**

We will ask you, in a separate consent that you sign and date. It names what would be shared and who would receive it, it stays in force until you change or withdraw it, and it says how to withdraw it. We keep it and give you a copy whenever you ask. **If you do not sign it, nothing goes.** The only exception is a disclosure the law permits without your consent.

This is a real choice and you get to make it FIRST. If you would like your representative to go on serving you at their new firm, signing takes a moment — telephone (949) 556-5556 or [ ] a monitored compliance address — the PPM uses darren@teamgranite.com; confirm. If you would rather they did not, do nothing at all.

The 2023 policy did this the other way round: your information went unless you objected. That is opt-OUT, and California requires opt-IN for a non-affiliated firm. The practice is kept and the ORDER is corrected — the client still chooses, and now chooses before anything moves. Where your account was introduced by another RIA, that firm's own rights apply as well as this.

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6 · HOW WE PROTECT IT

Access is limited to the people who need it to do their work. Devices and accounts carrying client information use multi-factor authentication where the service supports it. Information sent to custodians and advisers goes over the custodian's or the portal's own secured channel. Service providers are under written confidentiality obligations. Paper and electronic records are disposed of securely.

NO SYSTEM IS PERFECTLY SECURE, AND SAYING OTHERWISE WOULD BE THE KIND OF ABSOLUTE THIS FIRM HAS BEEN CORRECTING ALL WEEK. We do not promise that information can never be accessed without authorisation; we promise the measures above and the response below.

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7 · IF SOMETHING GOES WRONG

We log and investigate every suspected security event, and take steps to contain it.

Where the law requires us to tell you, we tell you — within 30 calendar days of discovering the breach or being notified of it, except so far as the law allows us longer. We say what happened, what information was involved, and what you can do about it, in a notice headed **"Notice of Data Breach"**.

Where the information belongs to your own adviser rather than to us, we tell them immediately, so that they can tell you. For a sub-advised account that is often the case, because your adviser holds the client relationship and we hold the account.

The law allows two things to move that timing, and only two: a legitimate law-enforcement need, and the time reasonably necessary to work out the scope of the breach and restore the security of the system. **If either applies we tell you as soon as it no longer does**, and we say in the notice if a law-enforcement delay was involved.

8 · HOW LONG WE KEEP IT, AND FORMER CLIENTS

If you stop being a client, nothing here stops applying to you. We treat information about former clients, and about people who were clients of an adviser we sub-advised for, exactly as we treat information about current ones — same limits on sharing, same protection, same rights.

Records the securities laws require are kept for **at least five years from the end of the financial year in which the last entry was made**, with the first two of those years kept in a Granite office, and longer where another law or a legal hold requires it. Information we no longer need is disposed of securely.

9 · CALIFORNIA RESIDENTS

WE ARE NOT GOING TO ARGUE ABOUT WHETHER THESE RIGHTS APPLY TO US. YOU HAVE THEM EITHER WAY.

Whether or not California's consumer privacy law reaches a firm of Granite's size, **you may ask us to:**

- **tell you what personal information we hold about you**, and where it came from;
- **correct it** if it is wrong;
- **delete it**, except where we must keep it — the books and records an investment adviser is required by law to retain, and anything needed for an open account or a legal claim;
- **know who we shared it with**, and why.

We will not treat you differently for asking. And we do not sell personal information, to anybody, for any price. Ask through your adviser, or contact us directly — §10.

Granite is comfortably below the revenue and volume thresholds that law turns on, and much of what it holds is exempt in any case as information collected under the Gramm-Leach-Bliley Act. ***The firm has chosen not to rely on that.*** *A claim of exemption is true on the day it is written and quietly stops being true as a firm grows, and nobody re-reads a privacy notice when revenue changes.*

10 · THIS WEBSITE

This section covers what the websites collect, as distinct from what your account file holds.

What is collected when you use teamgranite.com or floor.teamgranite.com: your IP address, approximate location, the device and browser you are using, and which pages you looked at. **And if you sign a Program document online: your name, email address, the electronic signature itself, and the record of what you signed and when.**

Who it may be shared with: our hosting, email, document-signature and analytics providers, each given only what it needs — and nobody else, on the terms in §4.

Reviewing or changing it: ask us, or ask your adviser, and we will tell you what we hold about you and correct it. §9 sets out those rights in full.

If we change this notice materially, we post the revised version here with a new effective date, and tell you if the change affects information we already hold about you.

Effective date: [ ].

Do Not Track: browsers send a “do not track” signal that has no agreed meaning across the industry, so **we do not respond to it**. **We do not permit third parties to collect personally identifiable information about you across other sites through ours.**

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11 · CHANGES, AND HOW TO REACH US

We may change this notice. **The current version is always available on request and is delivered to every client annually**, and material changes are described when we deliver it.

Granite Capital Wealth Management LLC 9681 Allison Cir, Huntington Beach, CA 92646 Telephone (949) 556-5556

☐ email

Chief Compliance Officer: **Darren Crume**

Version 2.0 · ☐ adoption date · supersedes the policy dated 1 February 2023
