

Privacy Policy

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Introduction

GFT Group, LLC (referred to as “Company,” “we,” “us,” or “our”) is committed to protecting your privacy. This Privacy Policy explains what personal information we collect through our Maryland-based real estate development website, how we use and share that information, and your choices regarding your data. We adhere to applicable U.S. federal laws (including the Telephone Consumer Protection Act, TCPA) and state laws (including Maryland privacy and data protection laws) in handling your personal data. By using our website or providing your information, you agree to the practices described in this Privacy Policy.

Information We Collect

We collect personal information that you voluntarily provide to us, such as your name, email address, phone number, and any other information you submit via forms on our site. For example, when you fill out a contact or inquiry form, we may ask for your name, email, and phone number so we can respond to your request. We also collect information related to your real estate preferences or the services you inquire about if you choose to provide it. Additionally, our website may automatically collect certain technical data when you visit, such as your IP address, browser type, and browsing actions via cookies or similar technologies (you can manage cookies through your browser settings). We only collect data by lawful and fair means, and limit collection to what is necessary for the purposes described in this Policy.

How We Use Your Information

We use the personal information we collect for the following purposes:

- **Providing Services:** To respond to your inquiries, provide information you requested about our real estate developments, and otherwise fulfill your requests or transactions. For instance, if you ask for details about a property or project, we will use your contact information to provide those details.
- **Communication:** To communicate with you via email, phone, or SMS/text messages (with your consent) regarding your inquiries, appointments, or other service updates. We will also send you transactional messages such as appointment reminders or confirmations related to our services, as needed.
- **Marketing (With Consent):** To send you promotional communications about our projects, events, or services if you have opted in to receive such messages. We require your prior express consent before sending marketing text messages or emails, in compliance with the TCPA and other laws. This means we will only send you marketing SMS messages if you have actively agreed (e.g. by checking an opt-in box or providing written consent) to receive them. Your consent to receive marketing texts is not a condition of purchasing any property or service.

- **Improvement and Analytics:** To analyze website usage and improve our site's content, layout, and services. For example, we may use aggregate usage data to understand which pages are most visited, in order to enhance the user experience.
- **Legal Compliance and Protection:** To comply with applicable laws, regulations, or legal processes (such as responding to subpoenas or government requests), and to enforce our Terms and Conditions or protect the rights, property, or safety of the Company, our customers, or others.

We do not use your personal information for any purposes other than those described above without your consent. In particular, we will not sell your personal data to third parties or use it for profiling or targeted advertising without proper notice and consent, and we will clearly disclose if we ever engage in those activities (as of now, we do not).

SMS/Text Messaging and Email Communications

SMS Communications: We offer an SMS/text messaging program to provide updates and information to our contacts. You will only receive SMS messages from us if you have given us consent to do so, typically by opting in (for example, by checking a box on a web form indicating you agree to receive texts, or by texting a designated keyword to our number). By opting in to our SMS program and providing your mobile phone number, you expressly consent to receive text messages from us (and parties texting on our behalf, such as our service providers) at the number you provided. These messages may be sent using an automatic telephone dialing system or other automated system, and may include both marketing/promotional messages and transactional or informational messages related to our services. Examples: If you opt in, you might receive marketing texts about new property releases or special events, as well as transactional texts like appointment reminders or updates on a service you requested. We identify our Company in our text messages and include opt-out instructions in each initial message, per industry best practices.

Consent Not Required: We want to emphasize that your consent to receive marketing text messages is voluntary and not required as a condition of doing business with us. You can still inquire about or purchase our services without agreeing to SMS marketing; consent can be withheld or withdrawn at any time. If you do not wish to receive any marketing texts, simply do not opt in, or you can opt out as described below.

Message Frequency and Costs: If you opt in, you may receive periodic texts from us. Message frequency may vary (for example, you might receive a few messages per month, depending on your interactions or the number of events/promotions). We strive to keep messaging reasonable and relevant. Standard messaging charges apply: Message and data rates may apply to any SMS we send or that you send to us, according to your mobile plan. You are responsible for any fees charged by your mobile carrier for text messages, and those costs will not be charged by us. (If you have questions about your text or data plan, please contact your wireless provider.)

Opt-Out for SMS: You can unsubscribe from our SMS messages at any time. To stop receiving texts, reply with the word “STOP” to any of our messages (or follow any other opt-out instructions we provide). Once we receive your STOP request, we will send a final confirmation text to let you know you’ve been unsubscribed, and then you will no longer receive SMS messages from us. Please allow a short time for us to process your request. If you change your mind, you may re-subscribe by opting in again through our website or other provided method. We will honor all opt-out requests promptly, as required by law and carrier rules. Additionally, for help or support with our SMS program, you may reply “HELP” to any of our texts or contact us at the support email/number provided below.

Email Communications: If you provide your email address, we may send you email communications. This can include responding to your inquiries, sending documents or information you requested, and (with your consent) sending newsletters or promotional emails about our projects or services. Each marketing email will include an unsubscribe link that you can click to opt out of future emails. If you unsubscribe from marketing emails, we will remove you from the marketing list. However, we may still send you essential transactional emails (for example, an email with information you requested, or a confirmation of an appointment or transaction) as permitted by law.

A2P Messaging Compliance: We adhere to application-to-person (A2P) messaging rules and industry guidelines for text messaging. This means we have registered our messaging campaign as required and follow best practices set by mobile carriers and the CTIA (Cellular Telecommunications and Internet Association). For instance, our first text to you after opt-in will always identify our business and include opt-out instructions, and we maintain records of your consent. We comply with the TCPA’s requirements for prior express written consent for marketing texts and honor all Do-Not-Call (DNC) and opt-out requests. Our commitment to these rules is not only to avoid legal consequences, but also to respect your rights and build trust. Carriers are not liable for delayed or undelivered messages, and we, along with our service providers, are not responsible for technical issues outside our control that may affect message delivery. (In other words, text messaging services are provided on an “as-is” basis and may not be available in all areas at all times.)

User Consent and Choices

Providing Personal Data is Voluntary: You can always choose whether or not to provide personal information to us. However, note that if you choose not to provide certain contact information, we may not be able to respond to your requests or provide certain services (for example, we cannot send you SMS updates if you don’t provide a phone number, or we cannot email you without an email address).

Consent for Communications: By submitting your phone number or email to us (for example, by completing a website form and clicking “Submit”), you are consenting to be contacted by the Company. This includes being contacted for the specific inquiry you made, and if you opted in, for marketing messages as described above. If you prefer not to

receive any marketing communications, you have the right to withhold consent or opt out at any time. We will not send you marketing SMS or emails unless you have given consent, and we will not share your contact information with third-party marketers without your explicit permission.

Opting Out: You have control over how we use your information for marketing. If you initially consented but later change your mind, you can opt out of:

- **Text Messages:** by replying “STOP” as described in the SMS section (or by contacting us directly to request removal).
- **Marketing Emails:** by clicking the “unsubscribe” link in any promotional email, or contacting us to request removal.
- **Phone Calls:** If at any time you prefer not to be contacted by phone for marketing purposes, please inform us and we will note your preference on our internal Do Not Call list, in accordance with TCPA and DNC rules. We will stop marketing calls or texts, though we may still call you regarding active transactions or requests you’ve made, as allowed by law (e.g., to follow up on a service request, since providing your number for a specific interaction can imply consent for related non-marketing calls/texts).

Opting out of marketing communications will not affect our ability to communicate with you about transactions or services you’ve requested (for example, we may still send an appointment reminder or a response to a direct inquiry). However, if you wish to stop all communications from us, please contact us using the information in the Contact section, and we will accommodate your request to the extent possible (we may need to retain some contact information to honor your opt-out requests and for legal record-keeping).

Accessing and Updating Information: If you have an account with us or have provided us information, you have the right to request access to the personal data we hold about you and to request corrections of any inaccuracies. You may contact us to update or correct your contact information or other personal details at any time. We appreciate it if you keep your information up-to-date.

Third-Party Service Providers

We may share your information with service providers that help us run our business and provide our services to you. In particular, we use the GoHighLevel (GHL) Customer Relationship Management platform to manage our contacts and communications. This means that when you submit your information to us (such as filling out a form on our site), your contact details may be stored in our GHL CRM system. GHL (and its sub-processors, such as messaging gateways) will process your personal data solely on our behalf and under our instructions, for the purposes of storing the data and sending out communications (emails, SMS, etc.) to you as requested. We have an agreement in place with such providers to ensure your data is protected – for example, GHL is contractually obligated to implement reasonable security measures to safeguard personal information

and is not permitted to use your data for any purpose other than providing services to our Company.

Aside from GHL, we may also use other third-party services such as:

- **Email Service Providers:** for sending out email newsletters or transactional emails.
- **Telecommunications/API Providers:** that facilitate our SMS delivery (for example, GHL may route texts through third-party texting APIs or gateways).
- **Analytics or Cookies Providers:** to analyze website traffic (e.g., Google Analytics), in which case those providers may collect certain technical data from your browser via our site. Any analytics we use will be mentioned in our Cookie notice or similar section, and those providers are only allowed to use the data for analytics on our behalf.

We ensure that any third-party service provider we use is bound to protect your information and comply with applicable privacy laws. They are only given the information necessary to perform their specific services. We do not allow our service providers to use or disclose your information for their own marketing or other purposes. If you have questions about specific providers we use, feel free to contact us.

Disclosure of Information

We do not sell or rent your personal information to third parties for their own marketing use. We may disclose personal information to third parties only in the following circumstances:

- **Service Providers:** As described above, we share data with vendors who need it to perform functions on our behalf (such as our CRM, email delivery service, etc.). They are bound by contractual obligations to keep personal data confidential and use it only for the services requested.
- **Legal Requirements:** We may disclose your information if required to do so by law or legal process, or if we have a good-faith belief that such disclosure is necessary to comply with legal obligations. For example, we might have to provide information in response to a court order, subpoena, or a lawful request by government authorities.
- **Protecting Rights and Safety:** We may disclose information as necessary to enforce our Terms and Conditions, to investigate or protect against harmful activities against our Company, users, or property (including fraud, security incidents, or misuse of our website), or to protect personal safety or property of others.
- **Business Transfers:** If our Company is involved in a merger, acquisition, sale of assets, or other business transfer, personal information may be transferred to the successor or new owner as part of that transaction. In such cases, we will ensure the recipient agrees to protect your personal data consistent with this Privacy Policy or notify you and obtain consent if required by law.

Other than the above, you will be notified and given the opportunity to consent if your personal information might be shared with any other third parties for purposes not covered by this Policy.

Data Security

We take reasonable administrative, technical, and physical security measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. These measures include, for example, using encryption for data in transit (HTTPS on our website), access controls to limit who within our organization and our service providers can access your data, and maintaining up-to-date security software on our systems. Our CRM (GHL) and other providers also implement security and privacy safeguards, and we select reputable providers with standards such as encryption and network security in place. Additionally, we require via contract that our third-party service providers handling personal data maintain appropriate security measures.

Despite our best efforts, please understand that no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security of your data. You share information at your own risk, but we will work hard to protect it. In the unfortunate event of a security breach that compromises your personal information, we will notify you and the appropriate authorities as required by Maryland's Personal Information Protection Act (PIPA) and other applicable laws. For example, Maryland law requires us to notify affected Maryland residents of certain security breaches within 45 days of discovery. We will follow all legal requirements regarding breach notification, and strive to do so promptly and transparently.

Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law. For example, if you become a client or buyer, we may retain your information for the duration of our business relationship and for a period thereafter as needed for record-keeping or legal compliance. If you merely inquire and do not engage in services, we may keep your contact details for a reasonable period in case you have follow-up questions or to send you marketing communications (if you opted in), but we will delete or anonymize it upon your request or after it is no longer needed.

When determining retention periods, we consider legal requirements (e.g., real estate transaction records, tax and accounting rules), the nature of the data, and the purpose for which it was collected. For instance, certain business records must be kept for a number of years under law, whereas marketing contact lists will be pruned more frequently.

Opt-Out Preservation: If you have opted out of receiving communications from us, we may retain your contact information on a suppression list indefinitely to ensure we honor your opt-out (so we can prevent future messages to you).

Once personal information is no longer necessary or if you request deletion (and we have no lawful basis to retain it), we will securely delete or anonymize the data. Please note that we may retain a minimal amount of information if required for legal disputes, enforcing our agreements, or complying with legal obligations.

Your Privacy Rights

Depending on your jurisdiction or applicable law, you may have certain privacy rights regarding your personal information. We are committed to honoring the rights of individuals as required by law, which may include the following:

- **Access and Portability:** You may have the right to request confirmation of whether we are processing your personal data, and to obtain a copy of the personal information we hold about you. We will provide this in a readily usable format, so you can transfer it to another entity if needed (this is known as data portability).
- **Correction:** You have the right to request that we correct any inaccuracies or incomplete personal data we have about you. We encourage you to help us keep your information current by notifying us of any changes or errors.
- **Deletion:** You may have the right to request deletion of your personal information. If you request, we will delete the personal data we have about you, provided we do not have a legal obligation or compelling legitimate ground to retain it. (For example, we may retain information needed for a contract with you or required for legal compliance, but we will inform you if such an exception applies.)
- **Disclosure of Sharing:** You have the right to request information about whether your personal data has been shared with third parties and what categories of third parties. In this Privacy Policy we have described our practices, but you can also contact us for further details.
- **Opt Out of Certain Processing:** If applicable, you may have the right to opt out of processing of your data for purposes of targeted advertising, the sale of personal data (which we do not do), or profiling in furtherance of decisions that produce legal or similarly significant effects (we do not engage in such profiling). We have made available opt-out mechanisms for communications as described above, and you can always contact us to further limit or object to any processing.

These rights may be subject to certain limitations and exceptions under applicable law. For instance, the Maryland Online Data Privacy Act (effective October 1, 2025) provides Maryland residents with the above rights, but it applies to businesses meeting certain thresholds (e.g., those processing data of 35,000+ Maryland consumers). While our Company may not be legally required to comply with every aspect of such law (depending on our size/activities), we value your privacy and will strive to honor valid requests regardless. We will not discriminate against you for exercising any privacy rights (for example, we will not deny you services or charge different prices just because you made a data request). If we cannot fulfill a particular request, we will explain the reason to you (such as if the request is excessive or conflicts with legal requirements).

How to Exercise Your Rights: To exercise the rights above or any other rights you have under applicable privacy laws, please contact us using the information in the “Contact Us” section below. We may need to verify your identity before fulfilling certain requests (for example, we might ask you to confirm some information we already have on file to ensure we are dealing with the correct person). For requests under applicable laws, we will respond within the timeframe required (for instance, within 45 days for many state law requests, with the possibility of a reasonable extension). If we deny your request, you may have the right to appeal that decision by contacting us and providing details, and we will review and respond within a reasonable time as required.

Children’s Privacy

Our services are intended for adults interested in real estate development opportunities. We do not knowingly collect personal information from children under the age of 13. In fact, you must be at least 18 years old to use our website forms or to consent to communications from us (our services are not directed to minors, and we require that anyone providing personal data, especially a phone number for texting, is an adult). If you are under 18, please do not use or provide any information on this site. If we become aware that we have inadvertently collected personal information from a child under 13, we will promptly delete such information from our records. Parents or guardians who believe we might have any information from or about a minor may contact us to request deletion.

Changes to This Privacy Policy

We may update or revise this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make changes, we will post the updated policy on this page with a new “Last Updated” date. If the changes are significant, we may also provide a more prominent notice (such as adding a notice on our homepage or sending an email notification, if appropriate). We encourage you to review this Privacy Policy periodically for the latest information on our privacy practices. Your continued use of our website or services after any changes to this Policy constitutes your acceptance of the updated terms.

Contact Us

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

- **By Email:** privacy@gftgroupmd.com
- **By Phone:** 443-391-7850 (ask for the Privacy Officer or appropriate contact)
- **By Mail:** GFT Group, LLC, Attn: Privacy Department, 6340 Security Blvd, Suite 100-1410, Baltimore, MD 21207

We will address your inquiry as soon as possible and do our best to resolve any issues or fulfill any requests. Your privacy is important to us, and we welcome your feedback.