



# Privacy Policy

Effective Date: December 19, 2022

Your privacy is important to us. The purpose of this Privacy Policy is to explain the practices of the Private Wealth Management, Private Bank and certain other wealth management businesses conducted by Goldman Sachs & Co. LLC ("GS&Co."), Goldman Sachs Bank USA, the Goldman Sachs Trust Company, N.A. and the Goldman Sachs Trust Company of Delaware, inclusive of investment advisory services provided by and investment funds managed by Goldman Sachs Asset Management L.P. and its affiliates, (collectively "Goldman Sachs", "GS" or "we") with respect to the collection, use, disclosure, and safeguarding of your personal information.

GS&Co. also facilitates directed allocations via an interactive platform that allows a company to offer a portion of its securities for purchase to individuals the company selects, e.g., employees, customers, friends and family, and further offers issue-designated individuals the ability to open a brokerage account for themselves (collectively "DSP"). DSP services are made available through the Site.

If you have a relationship with another business unit of Goldman Sachs, you may be provided with a separate privacy policy with respect to the

collection, use, disclosure, and safeguarding of your personal information by that business unit. Please visit the [Goldman Sachs Privacy and Cookies Website](#) for more information about how your personal information is processed and to understand your rights and choices for those services.

These links accessible at [https://www.goldmansachs.com/privacy-and-cookies/docs/PWM\\_Privacy\\_Policy.pdf](https://www.goldmansachs.com/privacy-and-cookies/docs/PWM_Privacy_Policy.pdf) will take you to sections of this Privacy Policy explaining the following topics and, together with the information contained in the below sections, constitute our Notice at Collection:

- [The categories of personal information we collect;](#)
- [The purposes for which personal information are collected and used;](#)
- [Whether we sell or share, as defined by the California Consumer Privacy Act, as amended by the California Privacy Rights Act \(collectively, the "CCPA"\) personal information and a description of your right to opt out;](#) and
- [The criteria we use to determine how long we retain personal information.](#)

## OUR COLLECTION, USE, AND DISCLOSURES PRACTICES

In the table below, we have identified, by category, the various types of personal information that we collect about you and we have provided examples for illustrative purposes. Some data elements may fit into multiple categories. We may collect or generate personal information about you, or a third party acting upon your instruction, in a number of ways and from a number of sources depending on the services and our relationship with you. Although most of the personal information we hold is obtained directly from you, we have indicated below the other sources of such information.

We collect and use your personal information for specific purposes as explained in the table below and we have listed the types of parties with whom we may share it from time to time. Due to the size and complexity of Goldman Sachs' operations, it is not possible to name each of our data recipients in this policy. However, Goldman Sachs only shares your personal information with the types of data recipients listed below.

<b>Category: Personal Identifiers</b>
<i>Examples of Data Collected</i>
Name, address, email address, telephone number, identifiers assigned to you for our internal use, signature, publicly available photographic images
<i>Why Do We Collect This Data?</i>
Communicating with you; providing services to you; carrying out operational and administrative functions; marketing; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; internally generated information; publicly available sources; third party vendors that provide information to assist with marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Device and Online Identifiers and Related Information</b>
<i>Examples of Data Collected</i>
Internet Protocol ("IP") address; account user name / log-in; device information; device type
<i>Why Do We Collect This Data?</i>
Communicating with you; providing services to you; carrying out operational and administrative functions; helping us improve our services; marketing; preventing financial crime
<i>Where Do We Collect Data From?</i>
You; automatically generated from your device via Cookies (defined below) or similar technologies when you interact with the Site
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent
<b>Category: Demographic Information</b>
<i>Examples of Data Collected</i>
Date of birth, gender, number of financial dependents, family information, information about your personal and professional associates, your interests/preferences
<i>Why Do We Collect This Data?</i>
Understanding your needs and offering services to you; managing our relationship with you; marketing; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; publicly available sources; third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent



# Privacy Policy

<b>Category: Financial Information</b>
<i>Examples of Data Collected</i>
Account number(s) and other information regarding accounts at other financial institutions; your authority over, beneficial interest in and other information about entities you are associated with; public and private company affiliations; philanthropic affiliations and activity; source of wealth information; expected activity within your account; investor qualifications; investment goals and experience; net worth and liquidity needs; income; credit scores; tax classification and information and other information regarding your financial circumstances
<i>Why Do We Collect This Data?</i>
Carrying out operational and administrative functions; understanding your needs and offering services to you; managing our relationship with you; marketing; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; publicly available sources; your service providers (including external banks and custodians); third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime; consumer reporting agencies
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Government Identifiers</b>
<i>Examples of Data Collected</i>
Social Security number; tax identification number; national identification number; other government-issued identification number (such as driver's license, passport, or alien registration number)
<i>Why Do We Collect This Data?</i>
Carrying out operational and administrative functions; understanding your needs and offering services to you; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Legally Protected Classification Characteristics</b>
<i>Examples of Data Collected</i>
Age, citizenship, nationality, marital status, association with senior political officials and/or executives of government owned enterprises
<i>Why Do We Collect This Data?</i>
Carrying out operational and administrative functions; understanding your needs and offering services to you; marketing; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Internet, Application, and Network Activity</b>
<i>Examples of Data Collected</i>
Emails; activity on our website and mobile applications, including browsing history, search history, clickstream/online website tracking information and other data related to user activity
<i>Why Do We Collect This Data?</i>
Communicating with you; helping us improve our services; meeting our regulatory and compliance obligations and preventing financial crime; marketing
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; automatically generated from your device via Cookies or similar technologies when you interact with the Site
<i>Who Do We Share Data With?</i>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GA affiliates; vendors who provide support services to us; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Location Data</b>
<i>Examples of Data Collected</i>
IP geo-location from which you connect to the Internet when using our website or mobile applications
<i>Why Do We Collect This Data?</i>
Helping us improve our services; meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
Automatically generated from your device via Cookies or similar technologies when you interact with the Site



# Privacy Policy

<b>Who Do We Share Data With?</b>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors who perform support services for us; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Audio Data</b>
<b>Examples of Data Collected</b>
Audio recordings of telephone conversations regarding account activity
<b>Why Do We Collect This Data?</b>
Helping us improve our services; meeting our regulatory and compliance obligations and preventing financial crime
<b>Where Do We Collect Data From?</b>
You
<b>Who Do We Share Data With?</b>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services to us; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Professional or Employment-Related Information</b>
<b>Examples of Data Collected</b>
Occupation, title, employer, employment history, education, industry affiliations
<b>Why Do We Collect This Data?</b>
Carrying out operational and administrative functions; understanding your needs and offering services to you; managing our relationship with you; marketing; meeting our regulatory and compliance obligations and preventing financial crime
<b>Where Do We Collect Data From?</b>
You; your authorized representatives and agents; publicly available sources; third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<b>Who Do We Share Data With?</b>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Sensitive Personal Information</b>
<b>Examples of Data Collected</b>
Social Security number, driver's license number, bank account number, credit card number, or debit card number in combination with credentials allowing access to an account
<b>Why Do We Collect This Data?</b>
Carrying out operational and administrative functions; understanding your needs and offering services to you; managing our relationship with you; meeting our regulatory and compliance obligations and preventing financial crime
<b>Where Do We Collect Data From?</b>
You; your authorized representatives and agents; publicly available sources; your service providers (including external banks and custodians); third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime; consumer reporting agencies
<b>Who Do We Share Data With?</b>
Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS lawyers, auditors, accountants and others providing professional advice; GS affiliates; vendors that perform support services for us; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent



# Privacy Policy

In addition to the above disclosed uses, on occasion we may use your information:

- To provide services to you, which may include sharing such information internally as well as disclosing it to third parties, as described in this Privacy Policy and other privacy notices that we may provide to you in connection with the services.
- To refer you as a potential client to our affiliates, subject to applicable law.
- To operate, evaluate, and improve our business, the services, and our products.
- Authenticating identity, mitigating fraud and enhancing the security of the services.
- To send you marketing communications that we believe may be of interest, develop marketing and acquisition model, and deliver advertisements.
- To improve Site performance and personalize your experience with the Site, including by presenting content, products, and services tailored to you.
- Perform analytics concerning your use of our Site, including your responses to our e-mails and the pages and advertisements you view while using the Site.
- For any other purpose that we disclose at the time you provide, or when we collect, your information.
- We may use and share data that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable law and regulations.

Other situations in which sharing may occur, include:

- In the event of a corporate transaction, such as a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of our assets or liabilities, some of the personal information that we hold may be among the assets or liabilities transferred to a buyer or other successor. We may also transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or liabilities or any line of business, change in ownership control or financing transaction.
- We may disclose personal information to third parties as permitted by, or to comply with, applicable laws and regulations, including responding to a subpoena or other legal process.
- We may disclose personal information if we believe it is necessary or appropriate to protect our rights, property or safety, or the rights, property or safety of our employees, consumers or others, or to enforce our contractual rights.
- We may disclose personal information to others where permissible under applicable laws and regulations or when you provide your consent or direction.

## PROTECTION OF PERSONAL INFORMATION

Firm policy mandates that confidential information, including your personal information, be safeguarded from misuse, misappropriation and improper dissemination. Goldman Sachs maintains policies and procedures designed to protect client information in accordance with this Firm mandate, including training our employees,

physically locating our employees to minimize potential breaches of confidentiality, and applying technology controls as required by applicable law. More specifically, confidential information is made available only to persons who have a need to know such information in connection with the duties they carry out or the services they perform.

System access entitlements are designed to minimize exposure to confidential information, and reasonable and appropriate security measures are used to protect such systems against potential external threats. Procedures for escalating and remediating incidents involving actual or suspected security incidents are also an essential part of our security program. Finally, the use of personal information by affiliates and service providers is carried out in accordance with applicable state and federal privacy laws.

## RETENTION OF PERSONAL INFORMATION

We retain personal information for varying time periods depending on our relationship with you and the status of that relationship. When determining how long to keep personal information, we take into account our legal and regulatory obligations and our legitimate business interests (such as, managing the services, preventing fraud, responding to regulatory or supervisory inquiries, and establishing, exercising or defending legal claims, disputes or complaints).

## THE INTERNET

The following additional information will be of interest to you if you are a user of Goldman.com or DSP.Goldmansachs.com (collectively "the Site"):

Users of Goldman.com are required to identify and authenticate themselves prior to accessing our services. Generally, identification and authentication take place through the use of your user name and a password, or with an RSA SecurID® Card and a Personal Identification Number (PIN). The Site is built upon a secure infrastructure with multiple layers of protection, including measures ranging from proper physical security of our machines to system intrusion detection capabilities. Within the Site, Goldman Sachs uses industry standard encryption technologies to protect your information from external compromise.

Security is a cooperative effort between Goldman Sachs and the users of Goldman.com. Please remember that your user name and password are personal to you and should not be made available to any other person. Also, you should discontinue their use and notify us if you have any reason to suspect that someone else may be using them.

## COOKIES AND OTHER TRACKING TECHNOLOGIES

"Cookies" are small text files that may be placed on your browser when you visit websites. When you quit your browser, some Cookies are stored in your computer's memory, while some expire and disappear. Cookies allow your browser to remember some specific information that the web server can retrieve later on.

"Web Beacons", also known as Internet tags, pixel tags, or clear GIFs, are a type of technology placed on a webpage or in an email. Web Beacons are typically used to transmit information back to a web server.

We and our vendors use Cookies, Web Beacons, session replay, device advertising IDs and similar

technologies on the Site and in our email communications for a number of business purposes, such as to monitor our advertising, remember your preferences, personalize your experience, understand how you use and interact with the Site, suggest products tailored to you, for security purposes, to improve the services and for marketing campaign performance. These technologies collect information about your browser/device and your use of the Site, such as the time/date of access and time spent on the Site, pages visited, language preferences, whether you open our emails, and other traffic data.

You may be able to configure your web browser to decline Cookies and/or configure your email client to not load Web Beacons in emails. Please note that, if you choose to decline Cookies, certain features of the Site may not function properly or may not be accessible to you.

Please see the "Interest-Based Advertising" and "Do Not Track" sections below for information on the choices we provide you regarding Cookies, Web Beacons, and other tracking technologies.

## INTEREST-BASED ADVERTISING

Interest-based advertising refers to collecting information about your online activities over time and across different websites, devices, and other online services to deliver advertisements based on online activity. We use interest-based advertising to deliver advertisements and other targeted content to you, including through third-party advertising companies which we may permit to track your visits to the Site. These third parties may collect information about your online activities over time and across different websites and other online services.

We, and many of the third-party advertisers that place tracking tools on the Site, are members of the Digital Advertising Alliance's *Self-Regulatory Program for Online Behavioral Advertising*. You can learn more about the options available to limit these third parties' collection and use of your information by visiting the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#). Users of our mobile applications may install the Digital Advertising Alliance's AppChoices mobile app, available [here](#), and choose to opt-out of participating advertising networks' use of mobile app activity for interest-based advertising purposes.

If you choose to opt-out via the web-based tools, a Cookie will be placed on your browser indicating your decision. This Cookie is specific to a particular device and browser, so if you use different browsers or devices, you will need to opt-out on each. In addition, because the opt-out is facilitated via Cookies, if you clear your Cookies you will need to opt-out again. Likewise, mobile app opt-outs via AppChoices are based on your mobile device's advertising identifier, so if you reset it, you will need to opt-out again via AppChoices.

## DO NOT TRACK

The Site is not currently configured to respond to "do not track" signals or similar mechanisms. However, our Site is designed to support the Global Privacy Control, described at <https://globalprivacycontrol.org/>, which you can enable by downloading a participating browser or browser extension.

## ADDITIONAL CHOICES

If you decide at any time that you no longer wish to receive marketing emails from one of our lines of business, please follow the "unsubscribe" instructions provided in such emails. Please note that even if you unsubscribe, we may continue to send transactional or administrative emails, such as legally required, regulatory, billing, or service



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notifications.

## OTHER IMPORTANT INFORMATION

Any natural person using the Site or services must be at least 13 years of age. If you are visiting the Site or services from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database operated. The data protection and other laws of the United States and other countries might not be as protective as those in your state, province, or county.

## CHANGES TO THIS POLICY

We may update this Privacy Policy to reflect changes to our information practices or legal requirements. The effective date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Site or otherwise provide it to you. Your use of the Site or services following these changes means that you accept the revised Privacy Policy.

## RESIDENTS OF CALIFORNIA

California residents should be aware that this section does not apply to: personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and its implementing regulations, the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994; or other information subject to a California Consumer Privacy Act (CCPA) exception.

In the past 12 months, we may have disclosed each category of personal information listed in the "Our Collection, Use and Disclosure Practices" section to one or more of the categories of recipients listed in the "Who Do We Share Data With?" sections for the business purposes listed in "Why Do We Collect This Data?" sections.

We may create, maintain, and use deidentified information of California residents, and if we do, we will not attempt to reidentify that information unless permitted by California law.

## Your Rights

California residents have certain rights in relation to their personal information pursuant to the CCPA. These include the right to:

- Information about the personal information that we collect about you and the manner in which we use, process and disclose that information;
- Obtain the specific pieces of personal information that we have collected about you;
- Effective January 1, 2023, correct inaccurate personal information that we maintain about you;
- Delete certain personal information that we have collected about you
- Opt-out of the sale or sharing of your personal information to third parties under certain circumstances; and
- Not be discriminated against as a result of exercising any of the aforementioned rights

Although we collect certain categories of sensitive personal information as described in "Our Collection, Use, And Disclosures Practices", we do not use sensitive personal information in ways that the CCPA permits you to limit.

## Selling and Sharing

The CCPA requires that we describe disclosures of personal information where:

- We receive monetary or other valuable consideration (i.e., selling, as defined under the CCPA); or
- Effective January 1, 2023, we disclose personal information about you through our Sites to a third party for cross-context behavioral advertising (i.e., sharing, as defined under the CCPA).

We do not sell, and have not sold in the preceding 12 months, personal information to third parties.

Effective January 1, 2023, we may share, and may have shared in the preceding 12 months, personal

information from the "Personal Identifiers", "Device and Online Identifiers and Related Information", and "Internet, Application, and Network Activity" categories of personal information with advertising and marketing partners to facilitate the delivery and measurement of cross-context behavioral advertising. To opt-out of sharing, please click the "Your Privacy Choices" link on the footer of the website you are visiting. Please see the "Do Not Track" section above to learn how you can use opt-out preference signals and how they are processed.

If you choose to opt out via the web-based tools, a Cookie will be placed on your browser indicating your decision. This Cookie is specific to a particular device and browser, so if you use different browsers or devices, you will need to opt out on each. In addition, because the opt-out is facilitated via Cookies, if you clear your Cookies you will need to opt out again

We do not knowingly sell or share the personal information of minors under 16 years of age.

## Exercising Your Rights

If you would like to discuss or exercise such rights to access, delete, or correct your personal information, please contact:

- Private Wealth Management and Private Bank at 1-800-209- 0139 or email your Private Wealth Management team; or
- DSP at 1-888-741-7753 or email DSP@GS.com

The CCPA requires us to verify the requests we receive from you when you exercise certain of the rights listed above. To verify your request, we will check the information you provide us in your request against third party identity verification tools, as well as verify that any personal information relates to you. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized representative to exercise certain of the rights listed above on your behalf by providing the authorized representative with power of attorney pursuant to the California Probate Code or by executing other documentation we may require, and the representative may make the request on your behalf by following the instructions above. If an authorized representative submits a request on your behalf, we will contact you to verify that they represent you.