

Goldman Sachs & Co. LLC – Digital Advisory Solutions

Privacy Policy

Version 5.0, Effective May 28, 2020

Your Privacy Matters

Your privacy is important to us. We want you to understand how we may collect, use, share, and keep information about you and the choices that are available to you. This Privacy Policy sets forth the types of information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information, and other important terms that apply when you use the website located at www.honestdollar.com (the “HD Site”) or invest.goldman.com (the “GS Site”); the GS Site and the HD Site are each a “Site”) and the associated mobile applications (the “Application”). The Sites and Application are operated by Goldman Sachs & Co. LLC (“GS&Co.,” “we,” “us,” or “our”) in connection with its digital advisory services offering (“DAS”). GS&Co. is a wholly-owned subsidiary of The Goldman Sachs Group, Inc.

By using the Sites and/or Application, you agree to this Privacy Policy, as it may be amended from time to time in the future (see “Changes to this Privacy Policy” below). If you are a client, prospective client, or former client of Honest Advisors, LLC or GS&Co., please remember as you review this Privacy Policy that information you provide to us may be governed by our Privacy Notice and, if applicable, our Privacy Notice for California Residents. Please refer to those notices for additional information about our privacy practices and your rights and choices.

Introduction

GS&Co. operates an interactive platform that allows you to obtain certain investment advisory services (collectively, the “Services”). Through DAS, GS&Co. offers individuals the ability to open advisory accounts for themselves and jointly with other individuals, as well as individual retirement accounts, through the Sites and Application (“Program”). Our Services offered under the Program allow you to participate by opening a User Account and Advisory Accounts (as defined in the Terms of Use; collectively, “Accounts”) that we will manage in accordance with the Program, and, based on the information that you provide, select a portfolio within the Program. Our Services are made available through the Sites and Application.

In this Privacy Policy, we use the term “Personal Information” to describe information that identifies an individual or describes, relates to, or is associated with an identifiable individual. This may include device and online identifiers and related information; demographic information; financial information; government identifiers; legally protected classification characteristics; Internet, application, and network activity; location data; audio data; and professional or employment-related information. Personal Information does not include information that has been anonymized or aggregated so that it does not identify an individual.

Personal Information We Collect, Use and Disclose

We collect Personal Information when you, or a third party acting upon your instruction, provide it to us, such as when you seek to open an Account, answer questions on one of our Sites or

our Application to determine what kind of portfolio we might recommend to you, complete a survey or otherwise provide feedback regarding the Services, or contact us with questions.

Applicable law may require not only that we disclose the types of third parties with whom we may share personal information but also that we separately identify the categories of personal information we share with third parties for business purposes. These categories could include any or all of the following: personal identifiers; device and online identifiers and related information; demographic information; financial information; government identifiers; legally protected classification characteristics; Internet, application, and network activity; location data; audio data; and professional or employment-related information.

Due to the size and complexity of GS&Co.'s operations, it is not possible to name each of our data recipients in this policy. However, GS&Co. only shares your personal data with the types of data recipients listed below.

Category: Personal Identifiers
<i>Examples of Data Collected</i>
Name, address, email address, telephone number, identifiers assigned to you for our internal use, publically 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; internally generated information; publically 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&Co.'s lawyers, auditors, accountants and others providing professional advice; GS&Co.'s affiliates; non-affiliated companies that perform support services for your account or process your transactions, including custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Device and Online Identifiers and Related Information
<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; your device; data we collect by placing a cookie or pixel on your browser or application
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; non-affiliated companies that perform support services for your account or process your transactions; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent
Category: Demographic Information
<i>Examples of Data Collected</i>
Date of birth, family information, information about your personal and professional associates
<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; publically 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&Co.'s lawyers, auditors, accountants and others providing professional advice; GS&Co.'s affiliates; non-affiliated companies that perform support services for your account or process your transactions, including custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent
Category: Financial Information
<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 company affiliations; available account balance information; source of wealth information; investment goals and experience; net worth and liquidity needs; income; 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; to determine whether to process any particular one time or recurring contributions or deposit
<i>Where Do We Collect Data From?</i>
You; your authorized representatives and agents; publically 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
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; GS&Co.'s affiliates; non-affiliated companies that perform support services for your account or process your transactions, including custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co.

is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Government Identifiers
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; GS&Co.'s affiliates; non-affiliated companies that provide custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Legally Protected Classification Characteristics
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; GS&Co.'s affiliates; non-affiliated companies that provide custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Internet, Application, and Network Activity
<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
<i>Where Do We Collect Data From?</i>

You; your authorized representatives and agents; your device; data we collect by placing a cookie or pixel on your browser or application
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; vendors who assist with preventing financial crime or improving user experience; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Location Data
<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>
Data we collect by placing a cookie or pixel on your browser or application
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; vendors who assist with preventing financial crime or improving user experience; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Audio Data
<i>Examples of Data Collected</i>
Audio recordings of telephone conversations
<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>
You
<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&Co.'s lawyers, auditors, accountants and others providing professional advice; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Professional or Employment-Related Information
<i>Examples of Data Collected</i>
Occupation, employer, industry affiliations
<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; publically available sources; third party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime

Who Do We Share Data With?

Your authorized agents and representatives to whom you instruct or authorize us to disclose your data; GS&Co.'s lawyers, auditors, accountants and others providing professional advice; non-affiliated companies that provide custodial services; vendors who assist with preventing financial crime; regulators and law enforcement authorities as required by law; any person or entity to whom GS&Co. is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent

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

- To provide the 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 send you marketing communications that we believe may be of interest.
- To improve Site and Application performance and personalize your experience with the Sites and the Services, including by presenting content, products, and services tailored to you.
- Perform analytics concerning your use of our online services, including your responses to our e-mails and the pages and advertisements you view while using the Sites or Application.
- For any other purpose that we disclose at the time you provide, or when we collect, your information.

Other situations in which sharing may occur, include:

- In the event that you access the Services as brought to you by a third party through a co-branded URL, your e-mail address used to access the Services may be provided to that third party.
- We may transfer Personal Information to a third party in the event of a merger, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other sale or transfer of any or all of our business, assets, or stock, and during negotiations for the same.
- We may aggregate your Personal Information in a manner that no longer reveals your specific identity. We may use and disclose aggregated information for any purpose.
- We may also use and disclose, for any purpose, information that does not reveal your specific identity or directly relate to you as an identifiable individual, including the information described under "Information Collected Automatically," below. If, however, we are required to treat such information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Policy.

Access and Choice

If the Personal Information on file for you changes, or if you no longer desire our Services, you may correct, update, or amend your Personal Information to the extent legally permitted on the Sites, the Application, or by e-mailing Customer Support at support@honestdollar.com if you utilize the HD Site and support@invest.goldman.com if you utilize the GS Site. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began

prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

If you decide at any time that you no longer wish to receive marketing e-mails from us, please follow the “unsubscribe” instructions provided in such e-mails. Please note that you cannot opt out of administrative e-mails, such as regulatory, billing, or service notifications.

You may stop the receipt of push notifications on your mobile device through your device settings.

Information Collected Automatically

When you use our Site, we automatically record information such as browsing activity and data displayed or clicked on (such as user interface elements, ads, and links) and collect other information such as the type of device you use, browser type, operating system version, IP address, and date and time of access.

We use certain technologies, such as cookies, web beacons, and similar technologies, to collect information automatically from you when you use the Services. We may use these technologies to, for example, record your preferences, track your use of the Site across multiple devices, measure exposure to our online advertisements, monitor traffic, analyze use of the Site, for security purposes, to display information more effectively, to personalize your experience, and to improve the Site.

You have choices to limit some tracking mechanisms. Many web browsers automatically accept cookies, but you may be able to modify your browser’s settings to decline cookies. If you choose to decline cookies, certain features may not function properly or may not remain accessible to you. In addition, you may also render some web beacons unusable by rejecting or removing their associated cookies.

We may also use information collected automatically from a particular browser, device, or application to recognize you on another browser, device, or application linked to you, for fraud prevention and other purposes.

Log File Information

Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, and Internet browser type and version. We use this information to ensure that the Site function properly.

IP Address

Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Site, along with the time of the visit and the pages visited. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address.

Cookies

Cookies are small text files that may be placed on your device when you visit the Site or when you view advertisements that we have placed on other websites. Cookies allow your browser to remember some specific information, which the web server can later retrieve and use. When you quit your browser, some cookies are stored in your computer's memory, while some expire or disappear.

Tags, Pixels, Web Beacons, Clear GIFs

A web beacon, also known as an Internet tag, pixel tag, or clear GIF, is typically a one-pixel, transparent image located on a webpage or in an e-mail. These may be used when you are served with advertisements, when you interact with advertisements outside of our online services, or when you interact with our communications. They are generally used to transmit information back to a web server, and they help us measure the success of our marketing campaigns and compile statistics about usage of the Site.

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 to users of that device based on their web-viewing behavior. We use interest-based advertising to deliver advertisements and other targeted content to you. To facilitate interest-based advertising, we partner with third-party advertising companies who also use these tracking tools to provide advertisements on the Site or other websites. These third parties may use these technologies to collect information about you when you use the Site and your other online activities. They may collect information about your online activities over time and across different websites and other online services. They may also use persistent identifiers to track your Internet usage across other websites and devices in their networks beyond the Site. They may use this information to provide you with interest-based advertising or other targeted content. If you would like more information about this practice, and to learn about the options available to limit these third parties' collection and use of your information by visiting our [opt-out page](#) and the websites for the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#), as well as the webpages for (a) [Facebook's ad preferences tool](#) and [privacy policy](#) and (b) [Twitter's privacy controls for personalized ads](#).

If you choose to opt-out, a cookie will be placed on your browser or device 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.

Other Technology

We use the Google Maps API to help pre-fill in address information. To learn about Google's privacy practices, click <http://www.google.com/policies/privacy>.

Do Not Track Signals

We do not respond to browser do-not-track signals at this time.

Security

We take the security of your Personal Information seriously. We seek to limit access to your Personal Information to authorized employees, agents, contractors, or vendors. We also maintain physical, electronic, and procedural safeguards designed to protect the information against loss, misuse, damage, or modification, and unauthorized access or disclosure while in our possession. No data transmission or storage system can, however, be guaranteed to be fully secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

Other Important Information

Social Media and Links to Other Web Sites and Apps

This Privacy Policy applies only to the Site, the Application, and Services. However, the Site and the Application may contain links to other web sites and apps that are not operated or controlled by GS&Co. and for which we are not responsible. We encourage you to review the privacy policies of third-party properties before using them.

Minors

The Services are not directed to and may not be used by anyone under the age of 21 and, as such, we do not knowingly collect Personal Information from anyone under the age of 21. If you are under the age of 21, please do not submit any Personal Information to GS&Co. or use the Services. If a parent or guardian becomes aware that his or her child under the age of 21 has provided us with Personal Information, he or she should contact GS as follows: if you utilize the HD Site, call (855) 783-7283 or send an email to support@honestdollar.com; if you utilize the GS Site, call (833) 474-6837 or send an email to support@invest.goldman.com, and we will, subject to our recordkeeping obligations under the Investment Advisers Act of 1940 and other applicable law, delete such information from our files.

Changes to this Privacy 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 Sites or Application. Your use of the Sites or App following these changes means that you accept the revised Privacy Policy.

Other Important Information

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. You must be an individual of at least twenty-one (21) years of age and reside in the United States, on a United States military base, or in a United States Territory in order to use the Services. If you use the Services outside of the United States, you understand and consent to the transfer of your Personal Information to, and the collection, processing, and storage of your Personal Information in, the United States and elsewhere. The laws in the United States and these countries regarding Personal Information may be different from the laws of your country.

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.

If you are a resident of California, you have certain rights in relation to your personal information pursuant to the CCPA. These include your right to:

- Request information about the personal information that we collect about you and the manner in which we process and disclose that information
- Obtain the specific pieces of personal information that we have collected about you in the 12 months preceding your request
- Delete certain personal information that we have collected about you
- Opt-out of disclosures of your personal information to third parties under certain circumstances
- Not be discriminated against as a result of exercising any of the aforementioned rights

If you would like to discuss or exercise such rights, please contact us as follows: if you utilize the HD Site, call (855) 783-7283 or send an email to support@honestdollar.com; if you utilize the GS Site, call (833) 474-6837 or send an email to support@invest.goldman.com. California law 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 (which may include your name, phone number, and email address) against third party identity verification tools or verified information you have previously provided to us. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized agent to exercise certain of the rights listed above on your behalf by providing the authorized agent with power of attorney pursuant to the California Probate Code or by executing other documentation we may require. The authorized agent may make the request on your behalf by following the instructions above. If an authorized agent submits a request on your behalf, we will contact you to verify that they represent you.

California law requires that we describe certain disclosures of personal information where we receive valuable consideration. California law treats such disclosures as "sales" even if no money is exchanged. We do not sell information to third parties as defined under California law. We do not knowingly sell the personal information of minors under 16 years of age.

Contact Us

If you have any questions about our Privacy Policy, please contact GS as follows: if you utilize the HD Site, call (855) 783-7283 or send an email to support@honestdollar.com; if you utilize the GS Site, call (833) 474-6837 or send an email to support@invest.goldman.com.