



Privacy Policy

Primary Account Agreements

Effective Date: September 17, 2020

Your privacy is important to us. The purpose of this Privacy Policy is to explain the practices of the Private Wealth Management ("PWM") business conducted by Goldman Sachs & Co. LLC, 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" or "we") with respect to the collection, use, disclosure, and safeguarding of your 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. We collect and use your personal data for a specific purpose as explained in the table below and we have listed the types of parties with whom we may share it from time to time. Although most of the personal information we hold is obtained directly from you, we have indicated below the other sources of such information.

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 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 Goldman Sachs' operations, it is not possible to name each of our data recipients in this policy. However, Goldman Sachs 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, 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; 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 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 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 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, 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; 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 is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent



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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 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; 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 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 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
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 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
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 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 is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent



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Category: Location Data
Examples of Data Collected
IP geo-location from which you connect to the Internet when using our website or mobile applications
Why Do We Collect This Data?
Helping us improve our services; meeting our regulatory and compliance obligations and preventing financial crime
Where Do We Collect Data From?
Data we collect by placing a cookie or pixel on your browser or application
Who Do We Share Data With?
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; 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 is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Audio Data
Examples of Data Collected
Audio recordings of telephone conversations regarding account activity
Why Do We Collect This Data?
Helping us improve our services; meeting our regulatory and compliance obligations and preventing financial crime
Where Do We Collect Data From?
You
Who Do We Share Data With?
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; 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
Category: Professional or Employment-Related Information
Examples of Data Collected
Occupation, title, employer, employment history, education, industry affiliations
Why Do We Collect This Data?
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
Where Do We Collect Data From?
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
Who Do We Share Data With?
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; 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

In addition to the above, we may use data that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable laws and regulations.

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.

THE INTERNET (GOLDMAN.COM)

The following additional information will be of interest to you as a user of the PWM private client website (Goldman.com or "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.

* RSA SecurID is a trademark owned by RSA Security Inc.

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" are small text files that may be placed on your Web browser when you visit the Site or when you view advertisements we have placed on other Web sites. For more information about cookies, how our web sites use them, and your options with respect to their use, please see our cookies policy, available at <https://www.goldmansachs.com/privacy-and-cookies/index.html>.

"Clickstream" data (e.g., information regarding which of our Web pages you access, the frequency of such access, and your product and service preferences) may be collected by Goldman Sachs itself, or by our service providers, using cookies, Web beacons, page tags, or similar tools that are set when you visit the Site or when you view advertisements we have placed on another Web site. Clickstream data and similar information may be shared internally within Goldman Sachs and used for administrative



purposes; to assess the usage, value and performance of our online products and services; to improve your experience with our Web sites; and as otherwise permitted by applicable law or regulation. This information may be processed by us for the purposes described above, or on our behalf by third parties, solely in accordance with our instructions.

Goldman Sachs may make available on the Site third party applications, including, for example, bill pay services. Information collected by providers of such applications is governed by their privacy policies.

The Site is not currently configured to respond to "do not track" signals or similar mechanisms.

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 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.

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 at Goldman.com or 1-800-209-0139, or by calling or emailing your Private Wealth Management team. 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.