

## GOLDMAN SACHS FAIR PROCESSING NOTICE

### PURPOSE AND APPLICATION OF THIS NOTICE

The Goldman Sachs Group, Inc. and its subsidiaries ("**Goldman Sachs entities**") routinely collect and use information relating to identified or identifiable individuals ("**personal data**"), including relating to:

1. **Former clients:** our former clients, where these are natural persons (rather than legal entities or businesses) ("**former clients**");
2. **Former client representatives:** (i) natural persons who previously owned, represented (including as an employee) or were otherwise associated with an existing client of a Goldman Sachs entity; and (ii) natural persons who own, represent (including as an employee) or are otherwise associated with a former client of a Goldman Sachs entity, in each case whether that client is a natural person, legal entity, partnership, fund, trust (or similar legal arrangement) or other type of organisation. Such persons are referred to in this notice as "**former client representatives**";
3. **Client connected persons:** certain family members, next of kin, business partners and other associates, both past and present of (i) our current, former and prospective natural person clients, and (ii) of owners, advisors, directors, staff and other representatives of our other current, former and prospective clients. Such family members, next of kin, business partners and other associates are referred to in this notice as "**client connected persons**";
4. **Former employees:** former employees, workers, contingent workers, interns, agency workers, directors, advisory directors and country advisers of Goldman Sachs entities, including members of our alumni network ("**former employees**");
5. **Former applicants:** former applicants for employment or other positions with a Goldman Sachs entity ("**former applicants**");
6. **Employee/applicant connected persons:** individuals whose personal data is provided to us in connection with (i) a current or former applicant for employment or other positions with a Goldman Sachs entity, or (ii) a current or former employee, worker, contingent worker, intern, agency worker, director, advisory director or country advisor — such as referees, family members and next of kin. Such individuals are referred to in this notice as "**employee/applicant connected persons**";
7. **Vendors/partners and their representatives:** individuals who contract directly with us to provide products and/or services, or who act as our joint venture or strategic partners ("**vendors and partners**") and officers, directors, employees, contractors and other representatives of our vendors and partners ("**vendor and partner representatives**");
8. **Shareholders and their representatives:** natural person current and former shareholders in Goldman Sachs entities ("**shareholders**") or officers, directors,

employees, advisors, intermediaries and other representatives of such shareholders ("**shareholder representatives**");

9. **Transactional counterparties and their representatives:** natural person transactional counterparties ("**transactional counterparties**") or officers, directors, employees, advisors, intermediaries and other representatives of transactional counterparties ("**transactional counterparty representatives**");
10. **Management personnel:** management personnel of companies in which a Goldman Sachs entity seeks to invest or in respect to which a Goldman Sachs entity conducts due diligence activities;
11. **Guests:** visitors to our premises, individuals who attended, registered for or were invited to attend any events organised by us, including social events, marketing and business development events, charitable events and conferences / seminars ("**guests**"); and
12. **Newsletter recipients:** recipients of briefings and other newsletters or marketing communications issued by or on behalf of Goldman Sachs entities ("**newsletter recipients**").

We provide this notice in accordance with our obligations under the European Union's General Data Protection Regulation (EU) 2016/679 ("**GDPR**"), the GDPR as retained in the United Kingdom or any applicable data protection laws, and as part of our commitment to processing personal data transparently.

This notice applies to you if the Goldman Sachs entity or entities which collect or otherwise process your personal data are regulated by the GDPR. (Such entities are referred to in this notice as "**GS**", "**we**", or "**us**".) This is most likely to be the case if you, the business you represent, or a person associated with you (such as a family member or colleague) have/has provided your personal data to a Goldman Sachs entity located in the European Union ("**EU**") or the United Kingdom. See section 1 of this notice ("**Who is responsible for your personal data?**") for more information.

## CONTENTS

This notice provides information on:

- the GS entity or entities responsible for processing your personal data;
- the personal data we collect from you and from third parties about you;
- the purposes for which personal data is processed and our reasons for doing so (also referred to as our "legal bases");
- how your personal data may be shared by us; and
- your rights in relation to our processing of your personal data, and how you can exercise these rights.

## CONTACT DETAILS

If you would like to contact us regarding the processing of your personal data, please contact our data protection officer at [gs-privacy@gs.com](mailto:gs-privacy@gs.com) or at the following addresses: The UK data protection officer at: The Office of the Data Protection Officer, Plumtree Court, 25 Shoe Lane, London EC4A 4AU, United Kingdom and our German data protection officer at: Marienturm, Taunusanlage 9-10, 60329 Frankfurt am Main, Germany.

### 1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The GS entity or entities to which you, the business you represent or are associated with, or a person associated with you provided your personal data will be a controller of your personal data. In addition, where processing of personal data is undertaken by an entity controlled by, or under common control with, a GS entity (a "**GS affiliate**") for their own purposes, these GS affiliates may also be data controllers of your personal data.

A list of the Goldman Sachs controllers likely to be relevant to you and, where applicable, their representatives are set out in **Appendix 1** to this notice.

This notice applies in conjunction with any other notices you receive from GS and GS affiliates in connection with the processing of your personal data.

### 2. WHAT PERSONAL DATA DO WE PROCESS?

GS and GS affiliates will, depending on the relationship we have with you, process certain personal data relating to you, which may include the data listed below.

We may collect your personal data through direct communications with you. If you have not provided your personal data to us directly, it may have been provided to us by a person associated with you (such as a family member or colleague). In some cases, we may obtain your personal data from GS affiliates or from third parties such as credit reference agencies, public registers, financial crime screening databases, fraud prevention agencies, providers of identity verification and background checks, and persons or entities instructed by you to provide us with your personal data.

#### A. **PROFESSIONAL AND PERSONAL DETAILS**

##### *Applicable to all recipients of this notice*

We process your name and contact information. This information may be your professional and / or personal contact information, depending on the relationship we have with you the information provided to us. We may also hold details of your preferences regarding how we communicate with you, and information we use to identify you if you contact us, attend an event or visit our premises.

*Applicable to former client representatives, vendor and partner representatives, shareholder representatives, transactional counterparty representatives and management personnel*

In addition, we process details of your role as a representative and information used to liaise with you in connection with this role, such as any evidence of your authority to act in this capacity.

*Applicable to former employees and former applicants*

In addition, we may process personal details such as your gender, nationality, date of birth, immigration data (including passport details and place of birth), eligibility to work data, photograph and languages spoken.

**B. RECORDS CONNECTED WITH OUR RELATIONSHIP/INTERACTION OR FORMER RELATIONSHIP/INTERACTION WITH YOU**

*Applicable to all recipients of this notice*

This may include notes and records of agreements, interactions, meetings, conversations and correspondence that you or persons associated with you have with us or GS affiliates including, to the extent permitted or required by law, recordings of telephone calls, together with any identifiers that we or GS affiliates assign to records associated with you.

We may also process any information that you provide to us regarding your **health** or **religious beliefs** for the purposes of meeting your needs in relation to any meetings or interactions with you (such as arranging wheelchair access and managing dietary requirements).

*Applicable to former clients*

In addition, we may process data related to your former relationship and interactions with us, including financial details (such as account details, tax-related information, and financial standing and history), investor profile information (such as investment preferences, restrictions and objectives), and other details you submitted to enable us to assess your suitability for a product or service we provide and to make decisions regarding credit, risk appetite/tolerance and account strategy. This may include **health** information, where you have provided this to us.

*Applicable to former employees and former applicants*

In addition, we may process data related to your former employment and/or your application, such as position held or applied for, and recruitment-related data such as academic and employment history, qualifications and references. This may include information relating to any incidents, complaints, claims, disputes, legal proceedings or disclosures involving you.

If you are a former employee worker, contingent worker, intern, agency worker, director, advisory director or country advisor, this may also include remuneration and benefits data, leave information and information connected with management of an employment relationship, such as information relating to performance reviews and performance management, your role and reporting line, disciplinary and grievance

processes, flexible working arrangements, restructure and redundancy plans and monitoring data.

Where you have provided this information to us during the course of your employment or application process this may also include special categories of personal data, including details regarding: (i) your **health** (for example where you have taken sick leave and provided us with a doctor's note); (ii) **trade union membership**; (iii) your **religious beliefs**; (iv) your race/ethnicity; and (v) your **sexual orientation**.

*Applicable to shareholders*

In addition, we process information concerning your shareholding in GS. This may include copies of share certificates, information held on a share register and any other documentation illustrating your shareholding in GS. We may also process information on any income you receive in relation to your shareholding, for example any dividend payments.

**C. INFORMATION USED FOR BACKGROUND CHECKS, MONITORING AND REGULATORY COMPLIANCE**

*Applicable to all recipients of this notice except guests and newsletter recipients*

We may process data required for anti-money laundering checks, background checks and monitoring performed on you or a person or entity associated with you, as well as information to enable us to establish and meet applicable reporting and other regulatory requirements, and to identify any conflicts of interest. As part of this we may process data relating to your family members and associates. Where required or authorised by applicable laws, this may involve processing data relating to your affiliations (including any **political affiliations** you may have), as well as **criminal convictions or allegations of offences**.

*Applicable to former employees and former applicants*

In addition, we may also process data on your regulated status and any regulatory references, for example if you were part of any senior manager regime or undertook a regulated role.

**3. PURPOSES AND REASONS FOR PROCESSING YOUR PERSONAL DATA**

**3.1 PURPOSES FOR PROCESSING**

GS and GS affiliates always process your personal data for a specific purpose and process only the personal data relevant for achieving that purpose. In particular, depending on our relationship with you, we may process your personal data for one or more of the following purposes and for compatible purposes:

**A. CLIENT ACCOUNT OPENING AND PROVIDING PRODUCTS AND SERVICES TO CLIENTS**

***All notice recipients:*** This includes processing data about you that we may require in connection with the opening or servicing of a client account or the provision of services to clients.

***Former client representatives, client connected persons and management personnel:*** As part of this, your data may be processed in connection with assessing the suitability of a client or transaction, including as part of review and processing application and account opening documents and conducting background prudential and regulatory compliance checks. We may also process your data when keeping appropriate records and registers.

***Transactional counterparties and transactional counterparty representatives:*** As part of this, your data is processed in connection with transaction processing and record keeping.

**B. *APPLICANT ASSESSMENT AND WORKFORCE MANAGEMENT***

***Employee/applicant connected persons:*** Your data may be processed in connection with our assessment of applicant suitability, including through conducting background checks, administering our relationship with our applicants, employees, workers, contingent workers, interns, agency workers, directors, advisory directors or country advisors, and keeping appropriate records.

**C. *MANAGING OUR RELATIONSHIP WITH OUR CLIENTS***

***Client connected persons:*** Your data may be processed as part of our management and development of our client relationships, including compiling and utilising internal reports and notes, conducting risk reviews, and managing our client file.

**D. *MANAGING OUR RELATIONSHIP WITH FORMER EMPLOYEES AND FORMER APPLICANTS***

***Former applicants:*** This may include keeping your details on file and using these to consider you for alternative positions with GS, unless you have asked us not to consider you for other roles.

***Former employees:*** This may include complying with reference requests where you have named us as a referee and in respect of regulatory references. If you are a member of our alumni network this includes providing you with information relating to GS and the alumni network, inviting you to events and processing details relating to your involvement in this network.

**E. *MANAGING OUR RELATIONSHIP WITH OUR VENDORS AND PARTNERS***

***Vendors and partners; vendor and partner representatives:*** This includes conducting due diligence and other risk reviews and managing any agreement in place between us or with the vendor or partner you represent.

**F. *MANAGING OUR RELATIONSHIP WITH OUR SHAREHOLDERS***

***Shareholders and shareholder representatives:*** This includes all activities undertaken in managing and administering the relationship between GS and its shareholders or any authorised shareholder representatives. This includes processing personal data in connection with communications with shareholders, executing shareholder instructions concerning share purchases and share sales, administration associated with any existing and historical GS shareholdings, GS' maintenance of share certificates and share register records, and organisation of any associated dividend payments.

## **G. COMMUNICATING WITH YOU**

***All notice recipients:*** Processing data required to communicate with you in person, by telephone, mail and email, keeping records of our communications with you, and managing any complaints.

***Former applicants:*** This may include letting you know of other roles that may be of interest to you.

***Former employees:*** If you are a member of our alumni network, this includes communicating with you regarding our alumni events and initiatives.

***Employee/applicant connected persons:*** This may include communicating with you as necessary in connection with your relationship to an applicant or employee, worker, contingent worker, intern, agency worker, director, advisory director or country advisor for example in order to obtain a reference, or in the event of an emergency.

***Client connected persons:*** This may include communicating with you in limited circumstances where necessary in connection with your relationship to our client — for example in the event that we need to liaise with you as next of kin.

***Guests:*** This may include communicating with you in respect of an event you have registered to attend, including obtaining information we may require ensure we meet your needs and requesting your feedback following the event.

***Newsletter recipients:*** This includes sending newsletters to you that you have registered to receive.

## **H. CARRYING OUT OPERATIONAL AND ADMINISTRATIVE FUNCTIONS**

***All notice recipients:*** This includes carrying out billing-related and payments administration, access management, preparing business reports and accounts, operating information technology systems, archiving and backing up data, and transferring personal data. This also includes allowing you to access our websites and any secure online platform and other technological services made available to you.

## **I. HELPING US TO MANAGE AND IMPROVE OUR PRODUCTS, SERVICES AND OPERATIONS**

***All notice recipients:*** This includes testing new systems and upgrading existing systems. To the extent permitted by law, this may include recording telephone conversations, and monitoring emails.

***Former employees and applicants:*** This includes measures we take to promote diversity and preventing discrimination.

**J. *PRUDENTLY MANAGING OUR BUSINESS AND PROTECTING AND ENFORCING OUR RIGHTS***

***All notice recipients:***

This includes assessing, monitoring and managing financial, reputational and other risk, conducting audits of our business, liaising with our regulator, protecting our business, clients, staff, systems and the data used by our business, and establishing and enforcing our legal rights and defending against legal claims.

This also includes archiving and record management to comply with record keeping obligations, to conduct management reporting activities and to maintain an appropriate archive. This archive allows us to keep historical information about GS and to ensure that we have sufficient information relating to our business, including with respect to any legal obligations or potential legal claims.

**K. *MARKETING AND BUSINESS DEVELOPMENT***

***Guests:*** This includes organising and hosting business development activities, such as meetings and events held by GS at any GS premises or any third party premises, including on behalf of GS affiliates and our strategic partners. Our processing may include inviting you to attend such meetings and events and processing your registration for these.

***Newsletter recipients:*** This includes sending newsletters to you that you have registered to receive.

**L. *MEETING OUR REGULATORY AND COMPLIANCE OBLIGATIONS AND PREVENTING FINANCIAL CRIME***

***All notice recipients except guests and newsletter recipients:***

This includes:

- performing prudential and regulatory compliance checks on an ongoing basis;
- account and transaction monitoring, transaction reporting, tax reporting;
- monitoring our management of client accounts and client interactions;



- making disclosures to, and complying with requests from, public authorities, regulators, tax authorities, governmental bodies or law enforcement agencies, and investigating and preventing fraud and other crime;
- to the extent permitted or required by law, recording telephone conversations and monitoring emails and your use of our websites and of brokerage, financial or other services made available to you by GS electronically; and
- promoting diversity and preventing discrimination.

We may also process data for other purposes, which we will notify to you from time to time.

### 3.2 WHAT IS THE LEGAL BASIS FOR PROCESSING?

The personal data processing described in this notice may be:

- A. necessary in order to comply with our legal obligations under certain laws;

*This applies to regulatory compliance checks referred to in parts A, B and L of section 3.1, record keeping described in parts A, B, C, F, and J of section 3.1, reporting and creation of accounts referred to in part H of section 3.1, business management and regulatory liaison activities referred to in part J of section 3.1, and the processing described in part L of section 3.1, in each case where carried out in respect of the relevant laws.*

- B. necessary for entry into, or performance of, any contract(s) with you;

**If you are a shareholder, vendor or partner** this applies to the majority of the processing described in parts E and F of section 3.1 of this notice.

- C. necessary for the legitimate interest of GS or others (as described below), where these are not overridden by your interests or fundamental rights and freedoms; or

- D. in limited circumstances and to the extent the legal bases for processing set out above do not apply, processed with your consent (which we may obtain from you from time to time).

The "legitimate interests" referred to in section 3.2.C above are:

- the processing purposes described in A — L of section 3.1 of this notice to the extent the processing is not necessary in order to (i) comply with our legal obligations under certain laws or (ii) to enter into any contract with you and fulfil our obligations thereunder;
- working with the firm's regulators to meet their requirements, and complying with our regulatory obligations globally;

- exercising our fundamental rights and freedoms, including our freedom to conduct a business and our right to property;
- in relation to former employees and former applicants, ensuring the accuracy of working history; and
- in relation to the provision of references, the legitimate interest of a new employer (or any other party to which the reference is addressed) to receive confirmation of details relating to your relationship with GS for the purposes of confirming your working history.

### ***DATA RELATING TO POLITICAL OPINIONS, HEALTH, RELIGIOUS BELIEFS AND SEXUAL ORIENTATION***

#### ***Applicable to all recipients of this notice***

In addition, where we process data that you have provided to us regarding your health or **religious beliefs** for the purposes of meeting your needs in relation to any meetings or interactions with you (such as arranging wheelchair access), we will do so on the basis that (i) this processing is necessary for the purposes of carrying out our obligations and exercising our rights in the field of employment, social security or social protection law; or otherwise (ii) you provided us with your explicit consent to do so.

In limited circumstances we may process any of the personal data we hold to the extent necessary to defend, establish and exercise legal rights and claims.

#### ***Applicable to former employees, former applicants and former employee/applicant connected persons***

In addition, where we process data relating to your **political opinions, religious beliefs, and/or sexual orientation**, we process this data: (i) on the basis that you have made such data public (to the extent this applies); (ii) on the basis that this processing is necessary for the purposes of carrying out our obligations and exercising our rights in the field of employment, social security or social protection law; (iii) on the basis that such processing is in the substantial public interest (to the extent this applies); or otherwise (iv) if you have provided us with your explicit consent to do so.

### ***DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES***

#### ***Applicable to all recipients of this notice***

We process personal data relating to criminal convictions and offences as required or authorised by applicable law. For example, we may process data relating to actual or alleged criminal convictions and offences as part of checks and ongoing monitoring for anti-money laundering purposes.

#### **4. YOUR CONSENT**

To the extent GS is relying on your consent to process your personal data, you have the right to withdraw your consent to such processing at any time. You can do this by contacting our data protection team at [gs-privacy@gs.com](mailto:gs-privacy@gs.com).

#### **5. SHARING PERSONAL DATA**

Due to the size and complexity of GS's operations it is not possible to name each of our data recipients in this notice. However, GS only shares your personal data with the categories of data recipients listed below. Depending on our relationship with you, we may share your personal data with:

- A. in respect of vendor and partner representatives, the GS vendor or partner you represent;
- B. in respect of shareholder representatives, the GS shareholder(s) you represent;
- C. in respect of transactional counterparty representatives, the transactional counterparty you represent;
- D. GS affiliates;
- E. external custodians and strategic partners to GS and GS affiliates;
- F. payment providers/recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;
- G. market counterparties, and parties interested in or assuming risk in connection with a transaction (such as issuers of investments), shareholders selling securities in any offering, co-managers, lead managers underwriters, bookrunners, financial advisers or any other relevant agent or advisor, including any agent or advisor to any of the above;
- H. swap or trade repositories, swap data repositories or global trade repositories (or similar facilities or institutions), and stock exchanges;
- I. clearing houses, and clearing or settlement systems; and specialised payment networks, companies or institutions such as SWIFT;
- J. service providers who provide a service to or operate a system on behalf of GS or the institutions or entities referred to in this section 5 (including non-affiliated companies);
- K. our lawyers, auditors and accountants and others providing professional advice;
- L. relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws or regulations of any relevant jurisdiction;
- M. your agents, representatives and other persons acting on your behalf or to whom you instruct or authorise us to disclose your data;

N. with prospective purchasers and assignees in the event our business, or any part thereof, is sold or re-organised, or in the event that any product entered into with a client is sold, transferred or assigned in whole or in part;

O. any other person or entity GS reasonably thinks customary, necessary or advisable for the processing purposes described in this notice or to whom GS is obliged by applicable law or regulation to make the disclosure; and

P. any other party where we have first obtained your consent.

## 6. INTERNATIONAL TRANSFER

GS will ensure that appropriate safeguards are in place to protect your personal data and that transfer of your personal data is in compliance with applicable data protection laws. Where required by applicable data protection laws, GS has ensured that service providers (including other GS affiliates) sign standard contractual clauses as approved by the European Commission, the Information Commissioner's Office or other supervisory authority with jurisdiction over the relevant data exporter. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting [gs-privacy@gs.com](mailto:gs-privacy@gs.com).

The data sharing listed in this notice may involve the transfer of personal data to any country in which GS or a GS affiliate conducts business or has a service provider or to other countries for law enforcement purposes (including, without limitation, the United States of America and other countries whose data privacy laws are not as stringent as those in effect in the United Kingdom, Switzerland or the EU).

## 7. DIRECT MARKETING

You are entitled by law to object to use of your personal data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. You can opt-out of receiving any marketing emails by clicking the "unsubscribe" link in any such emails, or by emailing us at [gs-privacy@gs.com](mailto:gs-privacy@gs.com).

## 8. DATA SUBJECT RIGHTS

You may be entitled under the applicable data protection laws to the following rights in respect of your personal data:

**A. *RIGHT TO OBJECT TO CERTAIN DATA PROCESSING:*** To the extent that GS is relying upon the legal basis of legitimate interest to process your personal data, then you have the right to object to such processing, and GS must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where GS needs to process the data for the establishment, exercise or defence of legal rights and claims. Where GS relies upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

- B. **INFORMATION AND ACCESS:** You have the right to be provided with certain information about GS's processing of your personal data and access to that data (subject to exceptions).
- C. **RECTIFICATION:** If your personal data changes, we encourage you to inform us of the change. You have the right to require inaccurate or incomplete personal data to be updated or corrected.
- D. **ERASURE:** You have the right to require that your data be erased in certain circumstances, including where it is no longer necessary for us to process this data in relation to the purposes for which we collected or processed the data, or if we processed this data on the basis of your consent and you have since withdrawn this consent.
- E. **DATA PORTABILITY:** Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- F. **RIGHT TO RESTRICTION OF PROCESSING:** You have the right to restrict GS's processing of your personal data while your request for data rectification or objection to personal data processing is being considered, if we no longer need to process your data but you need that data in connection with a legal claim, or if our processing is unlawful but you do not want us to erase the data. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment and exercise of legal rights or defence of legal claims, to protect the rights of another person, or for reasons of important public interest.
- G. **RIGHT TO WITHDRAW CONSENT:** To the extent that GS is relying upon your consent to process personal data, you have the right to withdraw such consent at any time.
- H. **COMPLAINT:** You also have the right to lodge a complaint with a supervisory authority.

If you wish to exercise your rights you may do so by sending an email to [gs-privacy@gs.com](mailto:gs-privacy@gs.com). Alternatively you can send a written request to the GS entity with which you have a relationship, clearly marked "Individual Rights — Office of the Data Protection Officer", and sent to either of the the following addresses:

Goldman Sachs International,  
Plumtree Court  
25 Shoe Lane,  
London,  
EC4A 4AU  
United Kingdom

Or

Goldman Sachs Bank Europe SE, Taunusanlage 9-10, 60329 Frankfurt am Main, Germany

The letter should be accompanied, in the case of a request for further information and/or access, by a copy of your passport or other valid means of identification. We may provide additional ways for you to exercise your rights from time to time.

## **9. RETENTION OF PERSONAL DATA**

GS and GS affiliates retain personal data for varying time periods in order to assist us in complying with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reasons.

GS and GS affiliates retain your personal data for the period of time required for the purposes for which it was collected, any compatible purposes which we subsequently establish, any new purposes to which you subsequently consent, or to comply with legal, regulatory and GS policy requirements.

## **10. UPDATES TO THIS NOTICE**

The information in this notice may change from time to time — for example, the categories of personal data that GS collects, the purposes for which it is used and the ways in which it is shared may change. This notice may be updated from time to time.

## APPENDIX 1: GS CONTROLLER ENTITIES

GS ENTITY
GOLDMAN SACHS INTERNATIONAL
GOLDMAN SACHS INTERNATIONAL BANK
GOLDMAN SACHS (UK) SVC. LIMITED
GOLDMAN SACHS ASSET MANAGEMENT INTERNATIONAL
GOLDMAN SACHS GESTION, S.A.
GOLDMAN SACHS PARIS INC. ET CIE
GOLDMAN SACHS BANK EUROPE SE
GOLDMAN SACHS (RUSSIA)
GOLDMAN SACHS REALTY MANAGEMENT GMBH
GOLDMAN SACHS POLAND SERVICES SPOLKA Z OGRANICZONA ODPOWIEDZIALNOSCIA
GOLDMAN SACHS BANK USA – LONDON BRANCH
GOLDMAN SACHS BANK AG*
GOLDMAN SACHS & CO. LLC*

\* The local representative of Goldman Sachs Bank AG and Goldman Sachs & Co. LLC in the UK is Goldman Sachs International and in the EU is Goldman Sachs Bank Europe SE.