



# Privacy Policy

## Primary Account Agreements

**Effective Date: November 20, 2024**

Your privacy is important to us. The purpose of this Privacy Policy (as updated from time-to-time, this "Privacy Policy") is to explain how we collect, use, disclose and protect personal information. This Privacy Policy applies to (i) the practices of Private Wealth Management ("PWM"), Private Bank, the Directed Share Program ("DSP") and certain other Goldman Sachs wealth management businesses that link to or apply to this Privacy Policy; (ii) the PWM, Private Bank, and DSP websites, currently located at [privatewealth.goldmansachs.com](http://privatewealth.goldmansachs.com) and [DSP.goldmansachs.com](http://DSP.goldmansachs.com) ("Sites") and the PWM and Private Bank mobile apps; and (iii) any other website, mobile app, online offering, or email associated with the above that is owned or operated by Goldman Sachs, and on which this Privacy Policy appears or is linked (collectively, the "Services"). This Privacy Policy also covers the personal information we collect from social media sites or pages associated with the Services and your interactions with our digital advertising campaigns.

The below sections of this Privacy Policy explain the following topics and constitute our Notice at Collection within the meaning of the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "CCPA"):

- The categories of personal information we collect;
- The purposes for which personal information are collected and used;
- Whether we sell or share, as defined under the CCPA, personal information and a description of your right to opt out; and
- The criteria we use to determine how long to retain personal information.

### OTHER PRIVACY DISCLOSURES

If you have previously received the [Goldman Sachs Private Wealth Management and Private Bank Privacy Notice](#), that notice will continue to apply to you. This notice provides more information about how we collect and share your personal information and outlines certain choices you may have. If there is a conflict between this Privacy Policy and any privacy notice, disclosure, policies or terms relating to any product, the privacy notice, disclosure, policies or terms relating to the product will govern.

### OTHER GOLDMAN SACHS RELATIONSHIPS

If you have other relationships with Goldman Sachs that are not covered by this Privacy Policy please visit the [Goldman Sachs Privacy Information and Resources Website](#) for more information about how your personal information is processed and to understand your rights and choices for those services.

### IMPORTANT TERMS

We want you to understand the following defined terms that we use throughout this Privacy Policy. When we use:

- "Goldman Sachs", "we", "us", or "our", we mean 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.

- "including" or "includes", we mean "including but not limited to" or "includes but is not limited to".

### What Personal Information We Collect and Generate

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 the relationship we have with you. For example:

- **Before you begin an application or open an account**, we may collect data from affiliates and third parties, such as data analytics providers and credit reporting agencies, to perform marketing analyses, identify prospective clients and deliver marketing communications;
- **While applying, or opening an account with us, and over the course of your relationship with us**, you provide information directly to us and we may collect information about you from third parties such as data analytics providers, the public domain, credit reporting agencies, identity verification and fraud prevention services and government entities, and we also may generate new information about you;
- **When you communicate, and interact with us over the phone and online, including via social media or other platforms**, we may monitor and record the content of the communications, and collect information about your use and interactions with the Services (such as via the mechanisms described in the "Cookies and Other Tracking Technologies" section below);
- **In connection with our marketing and communications**, we may collect digital information using Cookies, Web Beacons, or similar tools that we and our vendors and other third parties have set; and
- **When you interact with us via a social media platform**, we may collect a copy of the posts and other information, such as account ID or username.

The following is a list of the categories of personal information, along with some descriptions and examples, that we may collect or generate through each of the processes described above. Some data elements will fit into multiple categories.

- **Personal Identifiers:** This includes first and last name, previous name, alias, address, email address, account user name, telephone number, unique personal identifier and related information, publicly available photographic images, and signature;
- **Device and Online Identifiers and Related Information:** This includes online identifiers, Internet Protocol (IP) address,

device identifier, and other device information;

- **Background Information:** This includes date of birth, family information, information about your personal and professional associates and associations, and any other information we are required to collect by law and regulation;
- **Financial Information:** This includes credit report information, credit scores, bank account number, transaction and financial account information, account login credentials, household income data, tax documents, your authority over financial accounts including trusted contact status, beneficial interest in and other information about entities you are associated with, public and private company affiliations and activity, source of wealth information, investment goals and experience, net worth and liquidity needs, philanthropic affiliations and activity, expected activity within your account, investor qualifications, income and other similar financial information;
- **Government Identifiers:** This includes Social Security number, Tax Identification Number, national identification number, other government-issued identification number, driver's license number, passport number, Alien Registration Number and copies of government IDs;
- **Protected Classification Characteristics:** This includes age, race, citizenship, nationality, marital status, sex, association with senior political officials and/or executives of government owned enterprises, and gender;
- **Commercial Information:** This includes records of personal property, products or services purchased, obtained, or considered, and other purchasing or consumer histories or tendencies;
- **Internet, Application, and Network Activity:** This includes data related to user activity (e.g., when and how you use the Services and interact with our communications including emails) including emails, browsing history, search and clickstream history, online website tracking information, other data related to user activity, and URL referral header information;
- **Geolocation Data:** We may collect and receive information about your geolocation and your mobile device including a unique identifier for your device; in addition, in some instances, location information can be estimated from your IP address or through your Wi-Fi connection;
- **Sensory Data:** This includes audio data, such as a recording of your voice during certain phone calls;
- **Professional, Employment, and Education-Related Information:** This includes occupation, title, employer, employment history, income, industry affiliations, and education;
- **Inferences About You:** This includes a profile reflecting your preferences, characteristics, predispositions, behavior, attitudes, and creditworthiness profile; and

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- **Sensitive Personal Information:** Some of the personal information which is described above is also considered sensitive personal information. This includes Social Security, driver's license, state identification card, and passport numbers; account log-in, financial account, debit card, and credit card numbers in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin; citizenship or immigration status; and information relating to your health. Please note that we do not collect information regarding religious or philosophical beliefs, union membership, genetic data, sex life or sexual orientation unless you provide it to us in connection with servicing your account.

Although you do not have to supply any of the personal information we request, we may not be able to provide Services to you if you do not.

Personal information does not include information that has been anonymized or aggregated so that it does not identify an individual.

### How We Use Personal Information

We collect and use personal information for the following business purposes:

- Administering, operating and managing your relationship with us;
- Understanding your needs and offering services to you;
- Complying with contractual obligations, relevant industry standards, and our policies;
- Authenticating identity;
- Mitigating fraud and enhancing the security of our services;
- Contacting and communicating with you, including through push notifications and text messages;
- Conducting marketing activity, such as developing marketing models, identifying marketing recipients, developing marketing collateral and delivering advertisements and marketing communications;
- Responding to and reviewing social media messages or postings about us or our Services;
- Presenting third-party products and services we think may be of interest;
- Performing analytics concerning the use of the Services, including responses to our emails and the pages and advertisements that are viewed; and
- Operating, evaluating and improving our business and our services (including assessing and managing risk, fulfilling our legal and regulatory requirements, developing new services, improving and personalizing existing services, and performing accounting, auditing and other internal functions).

We may also use your personal information for any other purpose that we disclose at the time you provide, or when we collect, your information, and other purposes permitted by applicable law.

We may also use data that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable laws and regulations.

If your relationship with us ends, we will continue to treat your personal information as described in this Privacy Policy or as set forth in the privacy notice for the applicable product or service.

### To Whom We Disclose Personal Information

We disclose personal information as set forth below:

- **Goldman Sachs Affiliates:** We may disclose personal information to members of the Goldman Sachs family of companies in order to service accounts, improve services or for other purposes permissible under applicable laws and regulations.
- **Vendors:** We may disclose personal information to non-affiliated companies and partners that perform services for us, such as data analytics, fraud analysis, identity verification, risk management, security services, advertising and marketing, customer support, mail services, email delivery, information technology, and payment processing.
- **Legal Process and Emergency Situations:** We may disclose to third parties as permitted by, or to comply with, applicable laws and regulations. Examples include responding to a subpoena or similar legal process, protecting against fraud and cooperating with law enforcement or regulatory authorities. We may also disclose 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, customers or others, or to enforce our contractual rights.
- **Corporate Transactions:** 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 personal information to another entity or its affiliates or service providers 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.
- **Authorized Agents:** We may disclose to your authorized agents and representatives to whom you instruct or authorize us to disclose your data.

The Goldman Sachs Private Wealth Management and Private Bank Privacy Notice provides additional information about how we share personal information and choices that you may have.

We also may disclose personal information to others where permissible under applicable laws and regulations and when you provide your consent or direction.

### 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 or disappear.

"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.

We and our vendors use Cookies, Web Beacons, session replay, device advertising IDs and similar technologies on the Services 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 Services, 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 Services, such as the time/date of access and time spent on the Services, 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 Services 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 partners which we may permit to track your visits to the Services using the technologies described above. 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 advertising partners that place tracking tools on the Services, 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 on our websites by visiting our opt-out page and 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 at <https://youradchoices.com/appchoices>, 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



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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

We do not respond to the "Do Not Track" browser-based signal. However, our websites are designed to support the Global Privacy Control, described at <https://globalprivacycontrol.org/>, which you can enable by downloading a participating browser or browser extension.

### HOW WE PROTECT INFORMATION

We take the security of personal information, including U.S. Social Security numbers, seriously and work to limit access to 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.

### 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).

### CALIFORNIA RESIDENTS

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, the Gramm-Leach-Bliley Act and its implementing regulations, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994; or
- Other information subject to a CCPA exception.

In the past 12 months, we may have disclosed each category of personal information listed in the "What Personal Information We Collect and Generate" section to one or more of the categories of recipients listed in the "To Whom We Disclose Personal Information" section for the business purposes listed in the "How We Use Personal Information" section.

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;
- Correct inaccurate personal information that we maintain about you;
- Delete certain personal information that we have collected from you;
- Opt out of the sale and 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 the "What Personal Information We Collect and Generate" section, 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
- 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.

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.

#### Audience Marketing Choices

Some of our business segments may use certain personal information they have about you, such as your e-mail address, to deliver our ads to you on other websites. To exercise

choice regarding that type of advertising, please contact us via e-mail at [gs-audience-marketing-choice@gs.com](mailto:gs-audience-marketing-choice@gs.com) or phone at 1-844-930-0648.

#### Exercising Your Rights / Contact Us

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

- Private Wealth Management and Private Bank at 1-800-209-0139 or by emailing your Private Wealth Management team; or
- DSP at 1-888-741-7753 or by emailing [DSP@GS.com](mailto:DSP@GS.com)

As part of submitting a request, we will ask for your name, email address, phone number, date of birth, and mailing address.

The CCPA requires that we 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 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 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.

### ADDITIONAL CHOICES

You may receive a privacy notice in connection with our products that describes privacy choices. You may contact us to exercise your choices by following any instructions contained in our privacy notice or marketing materials. 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 notifications. Your mobile device settings may provide functionality to control push notifications that we may send.

### DO-NOT-CALL POLICY

If you are not a customer or do not have an account with us and you ask not to receive calls from us, you will be placed on our internal do-not-call list. Any request to be placed on our internal do-not-call list will be processed within a reasonable amount of time, not to exceed 30 days. Our employees receive training on how to use our internal do-not-call list, and how to document, process and honor requests to be placed on our internal do-not-call list. It is our policy to honor a do-not-call request for five (5) years from the time the request is made unless applicable law requires we honor it for a longer period of time. Subject to applicable law, if you communicate with us by telephone, we may monitor and may record the call.



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### LINKS AND THIRD-PARTY PRODUCTS AND SERVICES

The Services may contain links, QR Codes, and other functionality that connect with certain websites and applications not provided by us, including social media websites or websites of third-party service providers ("Third-Party Websites"). We provide these links and functionality solely as a convenience to you. We are not responsible for and have no liability for the content, features, products, services, privacy policies or terms of service of any Third-Party Websites. The fact that we have provided a link to a Third-Party Website is not an endorsement of

that Third-Party Website (including any information or content made available throughout such website) or its owners, sponsors or operators. We have not tested any information, software or products found on any Third-Party Website and therefore do not make any representations about those websites or any associated products or services.

### OTHER IMPORTANT INFORMATION

If you use the Services outside of the United States, your personal information may be transferred to the United States or other locations outside of your state, province, or country, where

privacy laws may not be as protective as those in your state, province, or country.

### UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time-to-time. The Effective Date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective in accordance with the modification provisions of the Customer Agreement.