PERSONAL DATA PROCESSING BY GOLDMAN SACHS – FAIR PROCESSING NOTICE FOR REPRESENTATIVES OF CLIENTS AND PROSPECTIVE CLIENTS

LAST UPDATED DATE: 22ND JUNE 2026

PURPOSE AND APPLICATION OF THIS NOTICE

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

1. staff, managers, advisors, intermediaries and other representatives of our clients and prospective clients ("**representatives**");
2. the beneficial owners and partners of our legal entity, partnership and fund clients and prospective clients; and
3. the settlors, trustees, beneficiaries and protectors of the trusts (or similar legal arrangements) to which we provide services or to which we may seek to provide services.

This fair processing notice ("**notice**") applies to you if the Goldman Sachs entity or entities which contract(s) or seek(s) to contract with the entity, partnership, trust or fund that you represent (including as an employee or officer), own or are otherwise associated with is established in the UK, the EEA, Switzerland, Kingdom of Saudi Arabia (**"KSA"**) or Indonesia, or you are an Indonesian citizen located outside Indonesia to whom applicable Indonesian data protection law applies. Such Goldman Sachs entity or entities are referred to in this notice as "**GS**", "**we**", "**our**" or "**us**".

We provide this notice in accordance with our obligations under the European Union's General Data Protection Regulation (EU) 2016/679 ("GDPR), the UK GDPR, the Data Protection Act 2018, the Saudi Arabian Personal Data Protection Law, issued by Royal Decree No. (M/19) dated 9/2/1443 H and amended by Royal Decree No. (M/148) dated 5/9/ 1444 H ("KSA PDPL"), and the Personal Data Protection Law (Law No. 27 of 2022) ("Indonesia PDPL"), together with its implementing regulations or any applicable data protection laws, and as part of our commitment to processing personal data transparently.

Other fair processing notices are available here: www.gs.com/privacy-notices. Please refer to these if:

A. you are a client or prospective client of our Private Wealth Management business, or you are a beneficial owner, partner, representative (or similar) of such client or prospective client (see the 'Private Wealth Management Clients' notice);

B. you are a shareholder or prospective shareholder in a fund managed by Goldman Sachs Asset Management, or you are a beneficial owner, partner, representative (or similar) of such shareholder or prospective shareholder (see the 'Goldman Sachs Asset Management Fund Shareholder' notice); or

C. you otherwise have a relationship or interaction with GS that is not listed in points 1-3 above (see the 'Other Data Subjects' notice).

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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 or at the following address: The Office of the Data Protection Officer, Plumtree Court, 25 Shoe Lane, London EC4A 4AU. If you are seeking to exercise Data Subject Rights, please submit your details here.

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The GS entity which contracts, or seeks to contract, with the entity, partnership, trust or fund that you own, represent or are with which you are otherwise associated will be a data 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 its own purposes, such GS affiliate may also be a controller 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?

2.1. YOUR PERSONAL DATA

GS and GS affiliates will, depending on the relationship we have with you and the products and services we provide (or seek to provide), process certain personal data relating to you and people connected to you, including the data listed below:

A. ***PROFESSIONAL AND PERSONAL DETAILS*** – primarily we process your name, details of the client you represent, own or are otherwise associated with, your role at such client and your professional contact details that you may have shared with us through documents. We may also process additional information in order to be able to liaise with

you in connection with this role, such as information to identify you and evidence your authority to represent our client. If you are a trust beneficiary or a fund unit holder this may also include details enabling us to honour your rights, including eligibility to payments, under the terms of the relevant trust or fund.

B. ***INFORMATION USED FOR BACKGROUND CHECKS, MONITORING AND COMPLYING WITH LAWS AND REGULATIONS*** – if you are a principal this may include date of birth, nationality, country of residence/domicile, documents required for anti-money laundering checks and monitoring (including a copy of your passport or national identity card), records of any required disclosures, and of restrictions on your ability to invest (such as any insider status or political exposure), and other details of your affiliations and/or of our relationship with you as necessary to enable us to meet applicable laws and regulations, including fulfilling regulatory reporting requirements and identifying any conflicts of interest.

Where required or authorised by applicable laws, this may involve processing data relating to any political affiliations you may have, as well as criminal convictions or allegations of offences.

C. ***RECORDS CONNECTED WITH OFFERING AND PROVIDING PRODUCTS AND SERVICES TO OUR CLIENTS AND PROSPECTIVE CLIENTS*** – such as notes from interactions, meetings and conversations that you have with us or GS affiliates (including records of your instructions and, to the extent permitted or required by law, recordings of telephone calls), records of correspondence and records of use of our websites, and/or our brokerage, financial or other services made available electronically by GS to you and/or the GS client or prospective client you represent (including data transmitted by your browser and automatically recorded by our server). This also includes account details, records of agreements, payments, investments, trades and other transactions that contain your name or other personal data, and any identifiers that we or GS affiliates assign to records associated with you. We may collect your personal data through direct communications with you. In some cases, we may obtain your personal data from a GS affiliate or from third parties. Depending on the products and services we provide to you or the entity, partnership, trust or fund with which you are associated, this may include trade or transaction counterparts, credit reference agencies, public registers (such as beneficial ownership registers), financial crime screening databases, fraud prevention agencies, and persons or entities instructed by you to provide us with your personal data.

2.2. DATA RELATING TO THIRD PARTIES – RELEVANT TO PRINCIPALS

If you are a **principal**, in addition to processing data on your representatives, if any (as discussed in this notice), we may process personal data of persons connected to you but with whom GS does

not directly communicate, such as dependants and family members. Additional information relating to our processing of their personal data is available online here: www.gs.com/privacy-notices (please see the 'Other Data Subjects' notice). Before you provide data relating to third parties for the processing of personal data by GS and GS affiliates in accordance with this notice, you should ensure that you are permitted to do so in accordance with applicable laws and regulations and make them aware of and agree to the information contained in that notice.

3. PURPOSES AND REASONS FOR PROCESSING YOUR PERSONAL DATA

3.1. PURPOSES FOR PROCESSING

GS and GS affiliates process your personal data for specific purposes and process only the personal data relevant for achieving that purpose. Depending on our relationship with you and the products and services that we are providing, we may process your personal data for the following purposes and for compatible purposes:

A. ***ACCOUNT OPENING –*** processing data about you that we require in connection with opening our client's account, such as identify verification information. This may include reviewing and processing application and account opening documents and, if you are a **principal,** conducting background prudential and regulatory compliance checks.

B. ***OFFERING AND PROVIDING PRODUCTS AND SERVICES TO OUR CLIENTS AND PROSPECTIVE CLIENTS*** – processing personal data to ensure the proper provision of our products and services. This includes identity verification, transaction processing and keeping appropriate records and registers (such as documenting agreements and recording instructions).

C. ***MANAGING OUR RELATIONSHIP WITH OUR CLIENTS AND CONNECTED PARTIES*** – including compiling and utilising internal reports and notes, managing the client file, conducting risk reviews, allowing you to access our websites and secure online platforms and other technological services, and, where applicable, managing any agreement or arrangement between us.

D. ***COMMUNICATING WITH YOU*** – processing data required to communicate with you in person, by telephone, mail and email (including issuing statements and reports), keeping records of our communications with you, and managing any complaints.

E. ***CARRYING OUT OPERATIONAL AND ADMINISTRATIVE FUNCTIONS*** - including carrying out billing-related and payment administration, staff and access management, preparing business reports and accounts, operating information technology systems, archiving and backing up data, and transferring personal data.

F. ***HELPING US TO IMPROVE OUR PRODUCTS, SERVICES AND OPERATIONS*** - including conducting market research, analysis of client and prospective client preferences, transactions and market trends, evaluating potential new products and services, and evaluating the effectiveness of our marketing, as well as testing new systems and upgrading existing systems. To the extent permitted by law, this may include monitoring emails and your use of our websites and brokerage, financial or other services made available to you electronically by GS, in order to assess, maintain and improve the quality of our services.

G. ***PRUDENTLY MANAGING OUR BUSINESS AND PROTECTING AND ENFORCING OUR RIGHTS*** – including assessing, monitoring and managing financial, reputational and other risk, conducting audits of our business, liaising with our regulator, protecting data used by our business and establishing and enforcing our legal rights and defending against legal claims.

H. ***MARKETING*** – such as direct marketing of products and services that we think may be of interest to our clients or prospective clients, including on behalf of GS affiliates and strategic partners.

I. ***MEETING OUR LEGAL, REGULATORY AND COMPLIANCE OBLIGATIONS AND PREVENTING FINANCIAL CRIME*** - 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, meeting our regulatory record keeping obligations, 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, this may include recording telephone conversations as well as monitoring emails and your use of our websites and of brokerage, financial or other services made available to you electronically by GS.

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

3.2. OUR REASONS (LEGAL BASES) 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 part A of section 3.1, record keeping described in part D of section 3.1, reporting and creation of accounts referred to in part E of section 3.1, business management and regulatory liaison activities referred to in part G of section 3.1, and the processing described in part I of section 3.1, in each case where carried out in respect of the relevant laws.

B. necessary for entry into, or performance of, a contract with you;

Where you act as an intermediary, this relates to processing to manage our agreement with you, referred to in part C of section 3.1.

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 – I of section 3.1 of this notice, to the extent the processing is not necessary in order to (ii) comply with our legal obligations under certain

laws or (ii) to enter into any contract with you and fulfil our obligations thereunder (for example, where you provide intermediary services);
- working with the firm's regulators to meet their requirements, and complying with our regulatory obligations globally; and
- exercising our fundamental rights and freedoms, including our freedom to conduct a business and our right to property.

*If required by applicable data protection laws, we will notify you if our processing of your personal data is mandatory. If processing your personal data is mandatory and you do not provide such mandatory personal data to us, we may not be able to engage or respond to you or fulfil your request.

Your personal data will not be processed in a manner inconsistent with the purpose of its collection or in cases other than those provided for in applicable laws.

When we process your personal data for a purpose other than the one for which it was originally collected, we will, before performing the additional processing, provide you with the necessary information regarding such processing. Your personal data will only be processed in a manner consistent with the original purpose of its collection or as otherwise permitted by applicable laws.

DATA RELATING TO POLITICAL OPINIONS AND CRIMINAL CONVICTIONS AND OFFENCES

In addition, if you are a **principal**, we may:

A. process data relating to your political opinions as part of our anti-money laundering checks. We process this on the basis that you have made such data public (to the extent this applies) or on the basis that this processing is necessary for reasons of the substantial public interest in preventing financial crime; and

B. process personal data relating to criminal convictions and offences as authorised by applicable law.

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**.**

4. 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. the GS client you represent;

B. GS affiliates;

C. external custodians and strategic partners to GS and GS affiliates;

D. payment recipients and providers, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;

E. 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;

F. swap or trade repositories, swap data repositories or global trade repositories (or similar facilities or institutions), and stock exchanges;

G. clearing houses, and clearing or settlement systems, and specialised payment networks, companies or institutions such as SWIFT;

H. 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 4 (including non-affiliated companies);

I. our lawyers, auditors and accountants and others providing professional advice;

J. relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws or regulations of any relevant jurisdiction;

K. your agents, representatives and other persons acting on your behalf or to whom you instruct or authorise us to disclose your data;

L. 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;

M. 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

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

5. 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.

The data sharing listed in this notice may involve the transfer or disclosure 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, the European Union, Kingdom of Saudi Arabia or Indonesia).

Where required by applicable data protection laws (including, in cases where the data privacy laws of recipient countries are not as stringent as those in effect in the United Kingdom, Switzerland, the European Union, Kingdom of Saudi Arabia or Indonesia), GS has ensured that service providers (including other GS affiliates) sign standard contractual clauses as approved by the European Commission 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.

GS leverages public, private, and hybrid cloud-based solutions where appropriate for certain compute, storage, and business purposes. GS maintains a formal governance process and control framework for cloud-based applications, which are documented in formal standards.

6. 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 further any marketing emails by clicking the "unsubscribe" link in any such emails, by emailing us at gs-privacy@gs.com.

7. USE OF ARTIFICIAL INTELLIGENCE

We may use technologies, such as machine learning, artificial intelligence, and generative artificial intelligence, which enable computer systems to automate or perform tasks that have traditionally required human intelligence ("**AI Systems**") to process Personal Information in connection with the purposes described in the "How We Use Personal Information" section.

Our use of AI Systems does not generally result in automated decisions with any material legal or similar effects. Where required under applicable law, we provide a specific notice and/or obtain consent. Our personnel involved in the development or deployment of AI Systems are trained to recognize bias and are required to take reasonable steps to mitigate bias decisions and to help prevent bias from occurring.

How we use AI Systems

AI Systems are used to assist and enhance activities as well as to automate repetitive tasks, generate outputs, and provide insights and analytics to support our work. For example:

- **Search**: To enhance our search capabilities. AI Systems are used to extract relevant information using specific questions, commands, and statements ("Prompts") from our databases as well as other documents, data, and records.
- **Summarize**: To classify, summarize, and digest content. AI Systems are used to condense documents, information, and text into summaries.
- **Analyze**: To assist with research, analysis, and problem-solving. Through techniques like natural language processing, AI Systems interpret, evaluate, and draw conclusions from data.
- **Generate Content**: To assist with drafting and generating content based on inputs or Prompts. Content can be reviewed and amended by an individual for accuracy and completeness.
- **Translate**: To translate text between languages.
- **Transcribe**: To create a written transcription of spoken communication, for example meeting notes, interviews, and podcasts.

8. DATA SUBJECT RIGHTS

You may be entitled under the applicable data protection laws and regulations 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. ***RIGHT TO OBJECT TO ANY DECISION-MAKING BASED ON AUTOMATIC PROCESSING:*** To the extent that GS is making a decision solely based on automatic processing with legal or significant impacts to you, then you have the right to object to such decision and GS must stop such processing.

C. ***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 pursuant to applicable laws and regulations).

D. ***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.

E. ***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.

F. ***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.

G. ***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.

H. ***RIGHT TO WITHDRAW CONSENT****:* If we require your consent to process any of your personal data, we will request this consent separately. To the extent GS relies on your consent to process any of your personal data, you have the right to withdraw your consent to such processing at any time.

I. ***COMPLAINT:*** You also have the right to lodge a complaint with a data protection supervisory authority, where applicable.

Please note the rights listed above may not be absolute rights under applicable law. Some of the rights only apply in certain circumstances and GS may have certain rights under applicable law to refuse your request.
Unless otherwise stipulated by the law, you will not be required to pay any fees in return for exercising this right. In case of submitting a request for exercising this right, you will receive a response within one calendar month of receipt of your request.

If you wish to exercise any your rights, please submit your details here or send an email to 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 – FAO The Office of the Data Protection Officer", and sent to the following address:

Office of Data Protection Officer,
Plumtree Court,
25 Shoe Lane,
London,
EC4A 4AU
United Kingdom

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 EUROPE SE
GOLDMAN SACHS PARIS INC. ET CIE
GOLDMAN SACHS BANK EUROPE SE

GOLDMAN SACHS (RUSSIA)
GOLDMAN SACHS REALTY MANAGEMENT GMBH
GOLDMAN SACHS ASSET MANAGEMENT INTERNATIONAL
GOLDMAN SACHS BANK USA – LONDON BRANCH
GOLDMAN SACHS BANK AG*
GOLDMAN SACHS SAUDI ARABIA
PT GOLDMAN SACHS INDONESIA SEKURITAS

* The local representative of Goldman Sachs Bank AG is Goldman Sachs International.

Contact details of local representatives for GS Controllers are available online at https://www.goldmansachs.com/privacy-and-cookies/privacy-country-specific-contacts

APPENDIX 2: PRINCIPALS

Any one or more of the following is a 'Principal' for the purpose of this notice:

1. Natural person client or prospective natural person client of a Goldman Sachs entity;
2. Director, beneficial owner or shareholder of a company that is a client or prospective client of a Goldman Sachs entity;
3. Beneficial owner or fund unit holder of a fund to which a Goldman Sachs entity provides services or seeks to provide services;

4. Natural person controlling or with control of a client or prospective client of a Goldman Sachs entity, generally defined as one of the following:

    4.1 A natural person who ultimately controls, whether directly or indirectly, more than 10% of the shares or voting rights in a legal entity client or prospective client; or

    4.2 A natural person who holds the position of senior managing official or otherwise has significant responsibility for directing, managing or controlling a legal entity client or prospective client; or

    4.3 A natural person who exercises ultimate control over the management of a legal entity client or prospective client despite being neither a shareholder or a director;

5. Principal, protector, settlor, grantor, trustee or other authorised person, trust officer or current beneficiary (or class of beneficiaries) of a trust to which Goldman Sachs provides services or seeks to provide services, or the class of natural person(s) in whose main interest the trust is set up which has the power to dispose or, advance, lend, invest, pay or apply trust property;

6. General partner or partner with management responsibilities in a partnership that is a client or prospective client of a Goldman Sachs entity;

7. A person authorised by a client or prospective client of a Goldman Sachs entity, whether granted through Power of Attorney or other form of appointment, to give instructions to a Goldman Sachs entity in respect of that client's account (including trading instructions and asset transfer instructions) or authorised to sign documents on behalf of such client;

8. Executor of an estate of a deceased natural person client of a Goldman Sachs entity;

9. Guardian of a natural person client of a Goldman Sachs entity, where such client is a minor;

10. Investment advisor to a client of a Goldman Sachs entity or a fund managed by Goldman Sachs Asset Management, where such advisor is a natural person (rather than a legal entity).