

# GOLDMAN SACHS FAIR PROCESSING NOTICE



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## Overview

### Purpose and Application of this Notice

Goldman Sachs Group, Inc. and its subsidiaries, affiliates ("**GS**", "**we**", "**our**" or "**us**") routinely collect and use information relating to identifiable individuals ("**personal data**"), including data relating to:

- (i) our clients and prospective clients, where these are individuals rather than legal entities ("**natural person clients**");
- (ii) the beneficial owners, partners and directors of our legal entity, partnership or fund clients and prospective clients;
- (iii) 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;
- (iv) advisors, managers, staff, intermediaries and other representatives of our clients and prospective clients ("**representatives**"); and
- (v) other persons affiliated or associated with our clients and prospective clients and their representatives, such as guarantors and family members.

We provide this fair processing notice ("**notice**") in accordance with our obligations under applicable data protection laws, and as part of our commitment to processing personal data transparently.

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, insofar as required by applicable data protection laws, our lawful basis for doing so;
- how your personal data is shared by us; and
- your rights in relation to our processing of your personal data, and how you can exercise these rights.

This notice applies to you if:

- the GS entity or entities which contract(s) (or seek(s) to contract) with you or with the entity, partnership, trust or fund that you own, represent or are otherwise associated with is established in the European Union, Monaco, the Kingdom of Saudi Arabia, Switzerland or the United Kingdom; or
- you are located in the European Union, Monaco, the Kingdom of Saudi Arabia, Switzerland or the United Kingdom and are a person with whom GS contracts or seeks to contract, or you are a beneficial owner, partner or settlor in respect of a GS client or prospective client.

### Questions and Contact Details

Please get in touch with your Goldman Sachs team to discuss any questions you have on the processing of your personal data.

Alternatively, you can contact our German and UK data protection officers:

- by email at [gs-privacy@gs.com](mailto:gs-privacy@gs.com); or
- by post at:
  - *Marienturm, Taunusanlage 9-10, 60329 Frankfurt am Main, Germany* (for the German data protection officer); or
  - *Plumtree Court, 25 Shoe Lane, London, EC4A 4AU* (for the UK data protection officer).

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**Important note: if you wish to contact Goldman Sachs Bank AG (“Swiss Bank”), the Goldman Sachs Bank Europe SE, Luxembourg Branch (“GSBE Luxembourg”) or Goldman Sachs (Monaco) S.A.M. (“GS Monaco”):** emails sent to [gs-privacy@gs.com](mailto:gs-privacy@gs.com) will be received by people and technology systems located outside of Switzerland, Luxembourg and Monaco respectively, and in jurisdictions where Swiss, Luxembourg and Monegasque confidentiality and/or secrecy regulations do not apply.

This means, when you contact the data protection officer by email you will release the Swiss Bank, GSBE Luxembourg and/or GS Monaco from all legal, statutory or contractual secrecy obligations (including Swiss / Luxembourg / Monegasque banking secrecy) to the extent required for the purposes of this notice.

Alternatively:

- (i) If you prefer that your communication be received within Switzerland, please contact [gsbankprivacy@gs.com](mailto:gsbankprivacy@gs.com);
- (ii) If you are a prospective client or a representative or any other person associated with a prospective client of GSBE Luxembourg and you prefer that your communication be received within Luxembourg please contact: *Goldman Sachs Bank Europe SE, Luxembourg Branch, 53 Boulevard Royal, L-2449, Luxembourg, Grand Duchy of Luxembourg*; or
- (iii) If you prefer that your communication be received within Monaco, please contact: *Goldman Sachs (Monaco) S.A.M., One Monte-Carlo, Place du Casino, Building G, 6th Floor North, MC 98000, Monaco*.

## 1. Who is responsible for your personal data?

The GS entity which contracts (or seeks to contract) with you or with the entity, partnership, trust or fund that you own, represent or are otherwise associated with will be a controller of your personal data.

In addition, when an entity controlled by, or under common control with GS (a “**GS affiliate**”) processes personal data for its own independent purposes, that GS affiliate may also be a controller of your personal data.

The list of GS controllers, their contact details and (where applicable) those of their representatives are set out in Appendix 1 to this notice.

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

## 2. What personal data do we process?

### 2.1 YOUR PERSONAL DATA

GS will process certain personal data relating to you and people connected to you, including the data listed in the table below. The extent to which GS will process this personal data depends on the relationship we have with you and the products and services we provide (or seek to provide) you.

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.

TYPE OF DATA	WHO THIS APPLIES TO
<b>A. Professional and personal details</b>	
<p>We process your name and contact information.</p> <p>We may also hold details of your preferences regarding how we communicate with you, and information we need to identify you when you contact us.</p>	<b>All recipients of this notice</b>
<p>We process your professional contact details.</p> <p>We may also process details of the client you represent, your role as client representative and information that allows us to liaise with you in connection with this role, such as evidence of your authority to represent our client.</p>	<b>Client representatives and prospective client representatives</b>
<b>B. Financial details and investor profile, including tax-related information</b>	
<p>We may process the following personal data:</p> <ul style="list-style-type: none"> <li>(i) your bank account details;</li> <li>(ii) financial standing and history;</li> <li>(iii) credit rating;</li> <li>(iv) the nature of our mandate and any discretion you permit us;</li> <li>(v) investment preferences, restrictions and objectives (including your personal circumstances, where relevant);</li> <li>(vi) job title;</li> <li>(vii) tax-related information and codes;</li> <li>(viii) information relating to your level of experience in investment matters; and</li> <li>(ix) if you apply for a product or service provided by us, details to enable us to assess your application for that product or service.</li> </ul>	<b>Natural person clients, beneficial owners, partners, trustees protectors and settlors</b>
Details of your financial standing and the guarantee you provide to us.	<b>Guarantors only</b>
<b>C. Records connected with service provision</b>	
<p>We may process the following personal data:</p> <ul style="list-style-type: none"> <li>(i) notes from interactions, meetings and conversations that you have with GS (including records of your instructions – whether for your own account or on behalf of the client you represent – and, to the extent permitted or required by law, recordings of audio calls);</li> <li>(ii) records of correspondence and use of our websites, and/or our brokerage, financial or other services GS provide electronically to you and/or the client you represent (including data transmitted by your browser and automatically recorded by GS servers);</li> <li>(iii) account details, records of agreements, payments, investments, trades and other transactions that contain your name or other personal data, and any identifiers that GS assigns to records associated with you; and</li> </ul>	<b>All recipients of this notice</b>

TYPE OF DATA	WHO THIS APPLIES TO
(iv) details regarding your <b>health or personal circumstances</b> if you provide us with this information in connection with account management or any support needs you have.	
<b>D. Information used for background checks, monitoring and regulatory compliance</b>	
<p>We may process details enabling us to honour your rights (including eligibility to payments) under the terms of the relevant trust, fund or similar arrangement.</p> <p>We may also process other details enabling us to meet our regulatory obligations, such as your date of birth, nationality and address.</p>	<b>Beneficiaries only</b>
<p>We may process the following personal data:</p> <ul style="list-style-type: none"> <li>(i) your date of birth;</li> <li>(ii) nationality;</li> <li>(iii) country of residence;</li> <li>(iv) documents required for anti-money laundering checks and monitoring (including a copy of your passport or national identity card);</li> <li>(v) records of any required disclosures;</li> <li>(vi) details of the origin of your wealth and of restrictions on your ability to invest (such as any insider status or political exposure); and</li> <li>(vii) other details of your affiliations and/or of our relationship with you as necessary to enable us to satisfy applicable regulatory reporting requirements and identify any conflicts of interest.</li> </ul> <p>We may process data relating to any <b>political affiliations</b> you may have, as well as <b>criminal convictions or allegations of offences</b>, where required or authorised by applicable laws.</p> <p>In some cases, we may obtain your personal data from GS affiliates or from third parties. Depending on the products and services we provide to you, this may include, for example:</p> <ul style="list-style-type: none"> <li>(i) trade or transaction counterparts;</li> <li>(ii) credit reference agencies;</li> <li>(iii) public registers (such as beneficial ownership registers);</li> <li>(iv) financial crime screening databases;</li> <li>(v) fraud prevention agencies; and</li> <li>(vi) persons or entities instructed by you to provide us with your personal data.</li> </ul>	<p><b>Principals only</b></p> <p><b>(see Appendix 2 for list of Principals).</b></p>

## 2.2 DATA RELATING TO THIRD PARTIES – RELEVANT TO PRINCIPALS

In addition to processing data on your representatives, we may also process personal data of persons who are connected to you but with whom GS does not directly communicate, for example, dependants and family members.

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Additional information relating to our processing of their personal data is available online here: [goldmansachs.com/privacy-and-cookies/pwm-fpn.html](https://goldmansachs.com/privacy-and-cookies/pwm-fpn.html).

Before you provide data relating to third parties, you should ensure you are permitted to do so and provide them with the information contained in that notice.

### **3. For what purposes and which legal bases do we process personal data?**

#### **3.1 PURPOSES FOR PROCESSING**

GS always processes your personal data for a specific purpose and processes only the personal data relevant for achieving that purpose. In particular, depending on our relationship with you and the products and services that we provide to you, we may process your personal data for the following purposes and for compatible purposes:

##### **A. ACCOUNT OPENING**

We will process data about you that we require in connection with opening your account or our client's account, such as identity verification information.

This may include review and processing application and account opening documents and, if you are a **Principal** (see Appendix [2](#)), conducting background prudential and regulatory compliance checks.

##### **B. UNDERSTANDING CLIENT NEEDS AND OFFERING PRODUCTS AND SERVICES TO OUR CLIENTS**

This includes assessing client suitability for products and services and making decisions regarding things such as risk appetite, tolerance, credit and strategy (where relevant to the products and services provided). If you do not contract directly with us for products and services, this may include communicating with and through you in connection with the offer of products and services to our client.

##### **C. PROVIDING PRODUCTS AND SERVICES TO CLIENTS**

We will process personal data to ensure the proper provision of our products and services, and to keep appropriate records. This includes identity verification, transaction processing and keeping appropriate records and registers (such as documenting agreements and recording your instructions – whether for your own account or on behalf of the client you represent).

If you are a **beneficiary**, we will process details enabling us to honour your rights (including eligibility to payments).

##### **D. MANAGING OUR RELATIONSHIP WITH OUR CLIENTS AND CONNECTED PARTIES**

This includes:

- (i) compiling and using internal reports and notes,
- (ii) managing the client file,
- (iii) conducting risk reviews,
- (iv) allowing you to access GS websites and secure online platform and other technological services; and
- (v) where applicable, managing any agreement or arrangement between us.

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## **E. COMMUNICATING WITH YOU**

We will process data required to communicate with you in person, by audio calls, mail and email (including to issue statements and reports, where applicable), keep records of our communications with you, and manage any complaints.

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

This includes:

- (i) carrying out billing-related and payments administration;
- (ii) staff and access management;
- (iii) preparing business reports and accounts;
- (iv) operating information technology systems;
- (v) archiving and backing up data; and
- (vi) transferring personal data.

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

This includes:

- (i) conducting market research;
- (ii) analysis of client and prospective client preferences;
- (iii) transactions and market trends;
- (iv) evaluating potential new products and services;
- (v) evaluating the effectiveness of our marketing, as well as testing new systems and upgrading existing systems.
- (vi) Where permitted by law, this may also include recording audio conversations, and monitoring emails and your use of our websites and of brokerage, financial or other services which GS makes available to you electronically to assess, maintain and improve the quality of our services.

## **H. PRUDENTLY MANAGING OUR BUSINESS AND PROTECTING AND ENFORCING OUR RIGHTS**

This includes:

- (i) assessing, monitoring and managing financial;
- (ii) reputational and other risk;
- (iii) conducting audits of our business;
- (iv) liaising with our regulator;
- (v) protecting data used by our business and establishing; and
- (vi) enforcing and defending against legal claims.

## **I. MARKETING**

This includes direct marketing of products and services that we think may be of interest to you or to our client or prospective client (as applicable), including on behalf of GS affiliates and our strategic partners. Subject to applicable laws, we will not process your sensitive data for marketing purposes.

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## **J. MEETING OUR REGULATORY AND COMPLIANCE OBLIGATIONS AND PREVENTING FINANCIAL CRIME**

This includes:

- (i) performing prudential and regulatory compliance checks on an ongoing basis;
- (ii) account and transaction monitoring, transaction reporting, tax reporting;
- (iii) monitoring our management of client accounts and client interactions;
- (iv) 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;
- (v) Where permitted or required by law, recording audio conversations and monitoring emails and your use of our websites and of brokerage, financial or other services which GS makes available to you electronically; and
- (vi) if you are a client of Goldman Sachs Bank AG ("**Swiss Bank**") or Goldman Sachs Bank Europe SE, Luxembourg Branch ("**GSBE Luxembourg**"), tracing your whereabouts where this is required by law or where your account may be at risk of falling into dormancy.

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

### **3.2 LEGAL BASIS FOR PROCESSING**

#### **GENERAL**

In most jurisdictions, applicable data protection laws require that we have a legal basis to process your personal data. We explain each of these legal bases below.

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:

- (i) regulatory compliance checks referred to in parts A and J of section 3.1;
- (ii) assessment of client suitability referred to in part B of section 3.1;
- (iii) record keeping described in part E of section 3.1;
- (iv) reporting and creation of accounts referred to in part F of section 3.1;
- (v) business management and regulatory liaison activities referred to in part H of section 3.1; and
- (vi) the processing described in part J 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**

This applies:

- (i) if you are a **natural person client**, to the majority of the processing described in parts A – F of section 3.1
- (ii) if 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, where these are not overridden by your interests or fundamental rights and freedoms;**

The "legitimate interests" are:



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- (i) the processing purposes described in parts **A – J** of section **3.1** (excluding, for the Kingdom of Saudi Arabia, part **I** of section **3.1**) to the extent the processing is not necessary in order to:
    - enter into contracts with you for the provision of these products and services and fulfil our obligations under such contracts, or
    - comply with our legal obligations under certain laws;
  - (ii) satisfy our accountability requirements and regulatory obligations globally; and
  - (iii) exercise our fundamental rights and freedoms, including our freedom to conduct a business and right to property.

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

## **DATA RELATING TO POLITICAL OPINIONS AND HEALTH**

**Applicable to Principals only (see [Appendix 2](#) for list of Principals):**

Where we process data revealing your **political opinions** as part of our anti-money laundering checks and monitoring, we process this on the basis that you have:

- (i) manifestly made such data public (to the extent this applies); or
- (ii) on the basis that this processing is necessary for reasons of the substantial public interest in preventing financial crime.

Where we process data regarding your **health** for the purposes of:

- (i) managing your account in accordance with your wishes and interests (primarily relevant for natural person clients);
- (ii) accommodating your support needs, including making adjustments to our services; or
- (iii) protecting your interests, including your economic well-being,

we will do so with your explicit consent (which we obtain from you from time to time) or where we are otherwise permitted to do so on the basis that it is necessary for reasons of substantial public interest (for example to protect clients' economic wellbeing).

You may have a right to object to us processing information concerning your health requirements and we will consider your request – see part **A** of section **8** for further details.

If you have provided explicit consent, you can withdraw this consent at any time – see sections **3** and part **G** of section **8** for further details.

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

## **3.2.3 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 - see parts **A** and **J** of section **3.1**.

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## 4. Your Consent

When 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 your Goldman Sachs using the [contact details](#) at the start of this notice.

Where you have withdrawn consent but GS retains the personal data, we will only continue to process that personal data where necessary, if we have a different legal basis to do so. However, this may mean that we cannot continue to provide you with all or some of our services, in which case we may terminate the relevant service(s).

Please note that this notice does not apply to consents you provide for any other reason, such as in connection with bank secrecy purposes.

## 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 recipient listed below.

Depending on our relationship with you, we may share your personal data with:

- (i) in respect of client representatives, the GS client you represent;
- (ii) GS affiliates (including custodians), external custodians and strategic partners;
- (iii) payment providers/recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;
- (iv) 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 or any agent or advisor to any of the above;
- (v) swap or trade repositories, swap data repositories or global trade repositories (or similar facilities or institutions), and stock exchanges;
- (vi) clearing houses, and clearing or settlement systems; and specialised payment networks, companies or institutions such as SWIFT;
- (vii) 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);
- (viii) GS' lawyers, auditors and accountants and others providing professional advice;
- (ix) relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws of any relevant jurisdiction;
- (x) your agents, representatives and other persons acting on your behalf or to whom you instruct or authorise us to disclose your data;
- (xi) 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 you is sold, transferred or assigned in whole or in part;
- (xii) 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
- (xiii) any other party where we have first obtained your prior consent.

If our relationship with you is subject to any banking secrecy rules and regulations, we only share your information as permitted under those laws, our agreement with you and/or any waivers you provide and this section 5 should be read accordingly.

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## 6. International Transfer

The data sharing listed in this notice may involve the transfer of personal data to any country in which GS conducts business or has a service provider or to other countries for law enforcement purposes (in principle this could be any country in the world 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 European Union, the Kingdom of Saudi Arabia, Switzerland or the United Kingdom).

We will ensure that appropriate safeguards are in place to protect your personal data where these are required by applicable data protection laws and that transfer of your personal data is in compliance with such laws.

Where required by applicable data protection laws, GS has ensured that:

- (i) service providers (including other GS affiliates) sign standard contractual terms as approved by the European Commission or other supervisory authority with jurisdiction over the relevant data exporter;
- (ii) the recipient is subject to a legally accepted set of rules to ensure data protection; or
- (iii) the data is transferred based on an exception, such as performance of a contract, consent, or in connection with legal proceedings abroad.

You can obtain a copy of any standard contractual terms in place which relate to transfers of your personal data by getting in touch with us using the [contact details](#) at the start of this notice.

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

## 7. Direct Marketing

You are entitled by law to object to the 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 getting in touch with us using the [contact details](#) at the start of this notice.

## 8. Data Subject Rights

You are entitled by law to the following rights in respect of your personal data:

### A. RIGHT TO OBJECT TO CERTAIN DATA PROCESSING

When GS is relying upon the lawful basis of "legitimate interest" to process your personal data (see part 3.2C3.2C of section 3.2 above) 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 claims. Normally, 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) including being informed of the legal basis and purpose for collection of your personal data.

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## 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, exercise 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. Please see section 4 above.

## H. COMPLAINT

You also have the right to lodge a complaint with a supervisory authority.

If you wish to exercise any of these rights you may do so by getting in touch with us using the [contact details](#) at the start of this notice.

You can also send a written request to the GS entity which you have a relationship with, clearly marked "**Individual Rights – FAO Private Wealth Management Privacy Steward**", using the address listed for that entity in in [Appendix 1](#) to this notice.

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.

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.

## 9. Retention of personal data

GS retains 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

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agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reasons.

GS retains your personal data for the period of time required for the purposes for which it was collected or to comply with legal, regulatory and GS policy requirements.

To the extent Goldman Sachs Bank Europe SE ("**GSBE**") is the controller of your personal data processed within the scope of this notice, the following additional information also applies. GSBE is subject to various retention and documentation requirements pursuant to among others, the German Commercial Code (*Handelsgesetzbuch*- "HGB") and the Tax Code (*Abgabenordnung*- "AO"). The retention and documentation periods specified in these codes last up to ten years. The storage period is also governed by statute of limitations periods, which can be up to thirty years, for example, pursuant to secs. 195 et seq. of the German Civil Code (*Bürgerliches Gesetzbuch* - "BGB") where the general limitations period is three years.

## 10. Is there an obligation to provide personal data?

Within the scope of our business relationship you only need to provide us with those personal data that are necessary for the establishment and execution of a business relationship or that we are legally obliged to collect. Without this personal data, we will usually have to refuse to conclude the contract or execute the order, or be unable to perform or execute an existing contract and may have to terminate it.

The legal obligations include our obligations under anti-money laundering laws and regulations. These laws and regulations require us to identify you before establishing our business relationship with you, for example by means of your identity card, and to collect certain personal data about you such as your name, place and date of birth, nationality and residential address.

To enable us to comply with these legal obligations, you must provide us with the necessary information and documents in accordance with applicable anti-money laundering laws and regulations. You also must notify us immediately of any changes arising in the course of the business relationship. If you do not provide us with the necessary information and documents, we may not enter into the business relationship you have requested.

## 11. 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 (outlined in section 2), 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 AND CONTACT DETAILS

GS ENTITY	HEAD OFFICE OR BRANCH OF GS ENTITY (IF APPLICABLE)	CONTACT DETAILS
GOLDMAN SACHS INTERNATIONAL	London (Head Office)	Plumtree Court 25 Shoe Lane London EC4A 4AU England
	Dubai (Branch)	
GOLDMAN SACHS INTERNATIONAL BANK		
GOLDMAN SACHS BANK EUROPE SE	Frankfurt (Head Office)	Marienurm Taunusanlage 9-10 60329 Frankfurt am Main Germany
	Amsterdam (Branch)	
	Dublin (Branch)	
	London (Branch)	
	Madrid (Branch)	
	Milan (Branch)	
	Paris (Branch)	
	Stockholm (Branch)	
	Luxembourg (Branch)	53 Boulevard Royal L-2449 Luxembourg, Grand Duchy of Luxembourg.
GOLDMAN SACHS BANK AG*		Claridenstrasse 25 8021 Zürich Switzerland
GOLDMAN SACHS (MONACO) S.A.M.		One Monte-Carlo, Place du Casino Building G, 6th Floor North MC 98000, Monaco
GOLDMAN SACHS & CO. LLC* – in respect of services provided to natural person clients, beneficial owners, partners or settlors habitually resident in the European Union, the United Kingdom or Switzerland		200 West Street New York, NY 10282 United States
GOLDMAN SACHS SAUDI ARABIA		Level 25, Kingdom Tower P.O. Box 52969, Riyadh 11573 Kingdom of Saudi Arabia

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\* Local Representatives: the local representative of Goldman Sachs International, Goldman Sachs International Bank, Goldman Sachs Bank AG and Goldman Sachs & Co. LLC within the European Union is Goldman Sachs Bank Europe SE. The contact details of Goldman Sachs Bank Europe SE are as set out above. The local representative of Goldman Sachs Bank AG and Goldman Sachs & Co. LLC within the UK is Goldman Sachs International. The contact details of Goldman Sachs International are set out above.

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## **APPENDIX 2**

### **PRINCIPALS**

Each of the following is a 'Principal' for the purpose of this notice:

1. Natural person client or prospective natural person client of GS;
2. Director, beneficial owner or shareholder of a company that is a client or prospective client of GS;
3. Beneficial owner or fund unit holder of a fund to which GS provides services or seeks to provide services;
4. Principal, protector, settlor, grantor, trustee, trust officer or current beneficiary of a trust to which GS provides services or seeks to provide services, or a person otherwise authorised to represent such trust;
5. General partner or partner with management responsibilities in a partnership that is a client or prospective client of a GS;
6. A person authorised by a client or prospective client of GS to give instructions to GS in respect of that client's account (including trading instructions and asset transfer instructions) or authorised to sign documents on behalf of such client;
7. Executor of an estate of a deceased natural person client of GS;
8. Guardian of a natural person client of GS, where such client is a minor;
9. Investment advisor to a client of GS, where such advisor is a natural person (rather than a legal entity).