
PRIVACY STATEMENT

22 February 2023

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In this privacy statement, “we”, “our” or “us” refers to Goldman Sachs Asset Management Holdings B.V. now part of Goldman Sachs Asset Management (“GSAM”).

WE ARE CAREFUL WITH YOUR PERSONAL DATA

Your privacy is very important to us, which is why we are careful with your personal data. We comply with the applicable legislation and regulations, including the provisions of the General Data Protection Regulation (GDPR). Information on how we process your personal data can be found below.

WHAT IS PERSONAL DATA?

Personal data concerns all direct and indirect information about a person. Examples of such information are your name and email address, the information that you provide to us when we enter into an agreement or when you use our websites.

WHO IS RESPONSIBLE FOR YOUR DATA?

The Goldman Sachs (“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 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, GS (each a “GS affiliate”) for their own independent purposes, these GS affiliates may also be data controllers of your personal data.

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

FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?

We process your personal data for the following purposes:

- **For the performance of our contractual obligations**
This includes taking steps to enter into a contract or to provide you access to our online services. For this purpose we use personal data such as your name, address, place of residence, phone number(s), e-mail addresses, login in credentials, and technical data needed for the functioning of the portal. We may further use financial information, your investor profile, and tax-related information including bank account details, financial standing and history, credit rating, the nature of our mandate and any discretion you permit us, investment preferences, job title, tax-related information and codes, information relating your level of experience in investment matters, and, if you apply for a product with us or service provided by us, details to enable us to assess your application.
- **To comply with legal requirements**
We process personal data such as your name, e-mail addresses, place of birth, and other data or documents required for identification, prevention of financial crime and Know your Customer (KYC) purposes to comply with legal requirements that GS, and GS affiliates are subject to.
- **With your consent**
We may use (sensitive) personal data with your permission, where absolutely necessary for the purposes we have described. You may always revoke your permission, if you no longer want that we use your (sensitive) personal data for these purposes.
- **For legitimate interests**
We may use your data for our legitimate interest, where these are not overridden by your interests or fundamental rights and freedoms. This may include processing personal data for the purposes named above, insofar this is not required for entering into a contract or complying with legal obligations.

Our legitimate interest further includes the execution of a client satisfaction survey, and inviting you for an

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event or webinar. For this purpose, we process personal data such as your name, and e-mail address. We also perform marketing activities, in accordance with your interests, to provide targeted commercial offers. Certain marketing activities require your consent. We always seek this consent from you beforehand. We use the following information and personal data for marketing activities: your name, e-mail address, and technical data that you leave behind when you visit our web pages. We use tracking pixels to analyze the effectiveness of our email communication and to better align these emails with your interests. Tracking pixels are invisible images that are placed in emails. A tracking pixel allows us to see if an email we have sent you has been opened. Further information about the use of cookies can be found in our Cookie Statement

WITH WHOM MAY WE SHARE YOUR PERSONAL DATA?

We may provide your personal data to the persons, companies and institutions named below. We do that only if:

- It is necessary for performing the contract;
- We have a 'legitimate interest' in it, and the provision of your data is necessary for this reason. This is explained in 'For what purposes do we process personal data';
- It is required by law to provide your data;
- You have given us your consent.

Only if we have at least one of the reasons mentioned above will we provide your data to one or more of the parties below:

- Our staff, as far as they need this data for their work.
- GS or GS affiliates, as far as necessary for operations and for fulfilling statutory obligations.
- Business partners, suppliers and companies to whom we outsource activities. Examples are IT, survey and marketing companies.
- Public services, such as supervisory and tax authorities, to the extent we are required by law to do so.

HOW WE TAKE CARE OF YOUR PERSONAL DATA

We ensure proper security. We spend a lot of time and effort on the security of our systems and the personal data stored within them. We also has a special team that monitors security and the use of personal data. We keep a constant eye on the security of our data traffic. We take immediate action should something ever go wrong. We resolve and register data breaches. That is also our legal duty. We also report them to the supervisory authority and to you, if necessary. There are checks on how we process your personal data.

- The Dutch Data Protection Authority (AP) checks whether we comply with the GDPR.
- The Dutch Authority for Consumers & Markets (ACM) monitors our use of cookies, direct marketing via email and the National Do Not Call Registry.
- The Dutch central bank (DNB), European Central Bank (ECB) and Dutch Authority for the Financial Markets (AFM) monitor the financial sector in general and, therefore, also us.
- Internally, the Data Protection Officer monitors how we handle your personal data. The Data Protection Officer can be reached via gs-privacy@gs.com

HOW LONG DO WE KEEP YOUR DATA?

We keep your data as long as we are required by law to do so and as long as necessary for the purpose for which we use the data. This may vary by product or jurisdiction. This is based on the following rules:

Personal data collected when we enter into a contractual agreement

We keep your personal data as long as you are our client. This obligation continues for a period of 10 years after termination of the agreement and in some cases for longer, but only if we have a lawful basis to do so. We retain your personal data to comply with international legal requirements and for risk management purposes. We do so to comply with international legal requirements.

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Personal data collected for newsletters and events

As soon as you subscribe on our website to receive a newsletter, we keep your personal data as long as you permit us to do so. You can withdraw your permission for receiving a newsletter by unsubscribing via our website or via the link in the email. After you have unsubscribed, we keep your personal data for a period of 30 days and in some cases for longer, but only if we have a lawful basis to do so.

WHERE DO WE PROCESS YOUR DATA?

Your data is generally processed within the European Union (EU). Personal data is processed outside the EU in some cases, for example by GS or GS affiliates that are not located within the EU. Some of our suppliers and business partners are also located outside the EU or provide these services outside the EU. The regulations in those countries do not always provide the same level of personal data protection as European regulations. We ensure that appropriate safeguards are in place to protect your personal data where these are required by applicable data protection laws and that transfers of your personal data are in compliance with such laws.

We take measures in such cases by entering into contracts ourselves that are approved by the European Commission, or by another relevant supervisory authority, wherein we make similar arrangements about the security of personal data and secure the possibility for you to exercise your rights, just like we do within the EU. We call these EU standard contractual clauses. If you have any queries which relate to transfers of your personal data please contact gs-privacy@gs.com.

WHAT ARE YOUR RIGHTS?

The GDPR gives you certain rights with respect to the personal data processed by us. These rights are explained below.

You have the Right of access

This means that you may request which personal data we have registered about you and what we use it for.

You have the Right to rectification, erasure and restriction

You are entitled to have your personal data changed if it is not correct. You are also entitled to have your personal data deleted if your personal data is unlawfully processed, no longer necessary for the purpose for which it is processed, or because you have withdrawn your consent and we no longer have any other legal grounds for processing your data. You are also entitled to restrict the processing of your personal data. This right means that you may tell us temporarily not to use your data. You may exercise this right if your personal data is incorrect, unlawfully processed, no longer necessary for the purpose for which it has been collected or processed, or if you object to the processing of your data and your objection is still being handled by us.

You have the Right to data portability

This means that in certain cases you are entitled to request us to take the personal data that you've provided us, and transmit it to you and another service provider.

You have the Right to object

You may lodge an objection to the processing of your personal data, if we use your personal data for purposes other than necessary for performing a contract or necessary for fulfilling a legal obligation. We will carefully assess your objection and stop processing your personal details, if necessary.

You have the Right to withdraw consent

You may revoke your consent that we may use your personal data at any time.

Setting your preference for offers

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

QUESTIONS OR COMPLAINTS?

If you would like to contact us regarding the processing of your personal data, please contact your GSAM professional contact or our data protection officer at gs-privacy@gs.com or at the following addresses: (i) in the UK: the Office of the Data Protection Officer, Plumtree Court, 25 Shoe Lane, London EC4A 4AU, United Kingdom; or (ii) in the EU: the Office of the Data Protection Officer, Marienurm, Taunusanlage 9-10, 60329 Frankfurt am Main, Germany. Our privacy policy may be changed from time to time. We recommend referring to this privacy policy regularly to stay informed about the latest changes. This privacy statement was last modified on 22 February 2023.