

# Privacy Policy

Goldman Sachs Japan Co., Ltd.

Goldman Sachs Japan Co., Ltd. (“Goldman Sachs”) hereby declares and makes public the following Privacy Policy with respect to its policy for the protection of your Personal Information (including Specific Personal Information).

## **1. Your Privacy Is Important To Goldman Sachs**

In the course of serving you as an individual client or as someone associated with a corporate or institutional client, Goldman Sachs may obtain Personal Information about you. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognize that you expect us to treat this information appropriately.

This Policy describes the types of Personal Information we may collect about you, the purposes for which we use the Personal Information, the circumstances in which we may share the Personal Data, and the steps that we take to safeguard Personal Data. Goldman Sachs will comply with laws and regulations relevant to the protection of Personal Information (including Specific Personal Information), guidelines of Personal Information Protection Commission, the Ministers having jurisdiction over the business in generation and Approved Personal Information Protection Organization and this Policy.

## **2. The Sources of Personal Information**

The Personal Information we collect about you comes primarily from the account applications, surveys conducted by us, and other forms and materials you submit to Goldman Sachs during the course of your relationship with us. We may also collect Personal Information about your transactions and experiences with Goldman Sachs relating to the products and services Goldman Sachs provides. In addition, we may collect Personal Information through public printed materials such as ‘Kaisha Shikiho’ (Corporate Quarterly Journal) or ‘Yakuin Shikiho’ (CEO Quarterly Journal), newspapers or the Internet. Depending on the products or services you require, Goldman Sachs may also obtain additional Personal Information about you, such as your credit history, from consumer reporting agencies. Furthermore we may collect your Personal Information for recruiting purposes from your applications to us or from recruiting agencies, our employees, our affiliates or other third parties.

Also, in the course of providing financial services to you and subject to strict compliance with all applicable laws and regulations, Personal Information may be collected about you indirectly through monitoring or other means (e.g., recording of telephone calls and monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis but it may be used for compliance or security purposes.

### **3. The Personal Information We Have About You**

If you deal with Goldman Sachs in your individual capacity (e.g., as an individual client), or as a settler/trustee/beneficiary of a trust, or as an owner or a principal of a company or other investment vehicle established to invest on your behalf or on behalf of your family, etc., the typical Personal Information we collect about you would include:

- Your name, address and other contact details;
- Your age, occupation and marital status;
- Extensive financial information, including asset situation, investment experience and objectives, risk tolerance; and
- Certain identifying information such information in your passport, national identity card or driver's license.

If you are an employee/officer/director/principal, etc. of one of our corporate or institutional clients, the typical Personal Information we collect about you would include:

- Your name and other contact details;
- Your role/position/title and area of responsibility; and
- Certain identifying information (in your passport or driver's license, etc.) as required by laws and regulations addressing money laundering and related matters.

Of course, you are not required to supply any of the Personal Information that we may request. However, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all Personal Data we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your Personal Information.

#### **4. Our Use of Your Personal Information**

We may use your Personal Information within the scope of the business and purposes as specified below except to the extent permissible under the relevant laws and regulations including in case you agree otherwise. Further, Individual Numbers will be handled only to the extent permitted by applicable laws and regulations.

##### (1) Businesses

- Business that financial instruments firms may engage in as set forth by the Financial Instruments and Exchange Law or other laws.
- Other financial services and any business incidental to the above mentioned business.

##### (2) Purposes of Use

- To solicit and sell securities and other financial products and give guidance on the services which Goldman Sachs or its affiliates provide based on the Financial Instruments and Exchange Law.
- To solicit and sell other financial products and provide guidance on the other services which we are allowed to provide based on the relevant laws and regulations.
- To confirm whether the products and the services we provide are suitable for you.
- To identify whether you are the Relevant Individual or his/her agent.
- To report to you on the result of transactions, balance in custody, etc.
- To conduct operations relating to transactions with you.
- To exercise rights and fulfill obligations based on the agreement with clients, and the law etc.
- To terminate transactions and for management after the termination of transactions.
- To collect necessary information for replying to inquiries from clients.
- To send greeting cards, and for notifying about seminars and receptions etc.
- To suggest financial products and services by sending direct mail etc.
- To research and develop financial products and services by conducting market research, data analyses and questionnaire surveys, etc.
- To facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

- Other than the purposes stated above, to carry out transactions with you properly and smoothly.
- To recruit personnel.
- To carry out our business operations properly when processing of Personal Information entirely or partially is outsourced from the other companies.
- To comply with requests from regulatory agencies with proper authority, and also to comply with requests based on applicable foreign regulations.

Based on the guideline relating to Security of Personal Information within Financial Industry (Personal Information Protection Commission/Financial Services Agency Notice No.1 February 28, 2017), except in the circumstances permitted under the guidelines, we will not acquire, use or provide to a third party sensitive information (including “Special Care-Required Personal Information” under Article 2(3) of the Law concerning Protection of Personal Information (hereinafter referred to as the “Law”), in addition to accession to labor union, creed, registered domicile, medical record and sexual orientation, (excluding those included in the definition of “Special Care-Required Personal Information”) (excluding the information published by the individuals, governmental authorities, local governments, or persons prescribed by each sub paragraph of Article 76 (1) of the Law, or prescribed by each sub paragraph of Article 6 of the Rules of the Personal Information Protection Commission Ordinance for Enforcement of the Law concerning Protection of Personal Information, or obvious appearances recognized by visual observation towards the individuals or recording the individuals). We will comply with Cabinet Office Ordinances such as the Ordinance Concerning Financial Instruments Business, etc., and other relevant laws and regulations and may not use nor disclose to a third party your information relating to racial origin, beliefs, creed, registered domicile, medical record or criminal records and other undisclosed special information that we may obtain during our business except to the extent necessary for us to facilitate appropriate business operations and other necessary matters.

## **5. Disclosures of Your Personal Data Among Affiliates**

Within the scope of purposes of use as listed above, we might share your Personal Data with our affiliates. In such a case we will be responsible for the management of your Personal Data protection and we will limit the items of your Personal Data to be shared with our affiliates to the extent necessary for the relevant purposes. Please see the name of [our affiliates](#).

We share your Personal Data as follows;

- ① Items of your Personal Data shared

- Your Personal Information such as name, address, date of birth, occupation etc.
  - Your transaction information such as detail of the transaction, deposit outstanding etc.
  - Your information about needs of asset management etc.
- ② Limits of users who share your Personal Data
- Goldman Sachs Japan Co., Ltd.
  - [Our affiliates](#)
- ③ Purpose of using Personal Data
- For the same purposes as listed above in “4. Our Use of Your Personal Information.”
- ④ Responsible person to control Personal Data
- Chief Personal Data Controller
- Goldman Sachs Japan Co., Ltd

## **6. Provision of Your Personal Data to Third Parties**

Goldman Sachs does not provide your Personal Data to third parties except as below.

Also, Goldman Sachs never sells your Personal Data to third parties.

- When we have received prior consents from you;
- When required by laws and regulations;
- When required for the protection of human life, physical security, or property and it is difficult to obtain the consents from you;
- When especially required for the promotion of public health or to ensure the sound development of children and it is difficult to obtain the consents from you;
- When cooperation with a governmental agency, a local municipality, or an entity delegated by the governmental agency or local municipality is required to perform official duties required by relevant laws and regulations and obtaining your consents may obstruct the execution of these tasks;
- When required in relation to outsourcing of all or part of handling of the Personal Data to the extent necessary for the purpose of the use;
- When required in relation to the business acquisition including merger, corporate split, or business transfer; and
- When Personal Data is jointly used in accordance with Section “5. Disclosures of Your Personal Data Among Affiliates” of this policy.

We will not provide Individual Number to third parties except for the cases allowed under the laws and regulations.

## **7. Information Security: How We Protect Your Personal Data**

Goldman Sachs will make effort to put necessary and appropriate security measures and provide appropriate supervision of the employees and the outsourcees in order to prevent leakage etc., of your Personal Data. We limit access to your Personal Data to authorized Goldman Sachs employees or outsourcees and, as described above in Disclosures of Your Personal Data to Third Parties, our service providers are held to stringent standards of privacy. We also make effort to maintain physical, electronic, and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A dedicated group - the Technology Division- that designs, implements, and provides oversight to our information security program;
- The use of specialized technology such as firewalls;
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as on-going scanning for publicly-known vulnerabilities in the technology;
- Internal and external reviews of our Internet sites and services;
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
- Implementing controls to identify, authenticate and authorize access to various systems or sites;
- Protecting non-public information transferred through encryption or other means; and
- Providing Goldman Sachs personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

## **8. Privacy and The Internet**

The following additional information will be of interest to you as a visitor to this site:

- Users of private Goldman Sachs Web sites are required to identify and authenticate themselves prior to accessing our services. Generally, the identification and authentication take place through the use of your user name and a password, or with an RSA SecurID\* Card and a Personal Identification Number (PIN).

- The private Goldman Sachs Web sites are built upon a secure infrastructure with multiple layers of protection, including measures ranging from proper physical security of our machines to system intrusion detection capabilities. Within such private sites, Goldman Sachs uses industry standard encryption technologies to protect your information from external compromise.
- Security is a cooperative effort between Goldman Sachs and the users of the Goldman Sachs Web sites. Please remember that your password, RSA SecurID Card and PIN are personal to you and should not be made available to any other person. Also, you should discontinue their use and notify us if you have any reason to suspect that someone else may be using them.
- “Cookies” are small text files that may be placed on your Web browser when you visit our Web sites or when you view advertisements we have placed on other Web sites. The information derived from cookies is used for administrative purposes, to help us gauge the effectiveness of advertising efforts, and to improve your experience with our Web sites. For example, this information may help authenticate you (i.e., verify that you are who you say you are), an essential component of site security. Cookies also make it easier for you to navigate a Goldman Sachs Web site by, among other things, “remembering” your identity so that you do not have to input your password multiple times as you move between pages or services. Cookies also may be used to serve you Goldman Sachs advertisements when you visit Web sites of third parties with whom we have marketing relationships. You can set your Web browser to inform you when cookies are set, or to prevent cookies from being set. However, if you decline to use cookies, you may experience reduced functionality and, for sites serving authentication-related cookies, declining cookies will prevent you from using the Web site altogether.
- “Clickstream” data (e.g., information regarding which of our Web pages you access, the frequency of such access, and your product and service preferences) may be collected by Goldman Sachs itself, or by our service providers, using cookies, Web beacons, page tags, or similar tools that are set when you visit our Web site or when you view an advertisement we have placed on another Web site. Clickstream data and similar information may be shared internally within Goldman Sachs and used: for administrative purposes; to assess the usage, value and performance of our online products and services; to improve your experience with our Web sites; and as otherwise permitted by applicable law or regulation. If you are a Goldman Sachs client, this information helps us suggest products or service offerings that may be of

interest to you. This information may be processed by us for the purposes described above, or on our behalf by third parties, solely in accordance with our instructions.

- When you visit this site, your browser may be momentarily directed to the Web site of an ad server or other third party service provider. This re-direction process will not be apparent to you. These third party Web sites automatically receive your IP address when this happens, and they may also collect information from your interaction with our Web sites including computer and connection information, standard Web log information, and ad information. Such information does not identify you individually.
- Goldman Sachs may make available on this Web site third party applications such as content linking or sharing facilities. Information collected by providers of such applications is governed by their privacy policies.

## **9. Changes to This Policy**

Goldman Sachs will make effort to keep this policy updated in order to protect your Personal Information appropriately.

## **10. Procedure for the Disclosure Etc.**

If you would like to request us to disclose, correct or cease the use of your Retained Personal Data, we will identify whether you are the Relevant Individual and endeavor to answer your requests appropriately and without delay. Please refer to the “Disclosure Procedure under Privacy Policy” below for a detailed explanation of the procedure.

Further, in the event of a request for disclosure as to whether or not we hold an Individual Number, we will respond as to whether or not we hold such Individual Number.

Please contact the following person for the procedure about the Retained Personal Data of our ex-employees.

Chief Employee Personal Data Controller

Human Capital Management

Goldman Sachs Japan Co., Ltd

Roppongi Hills, 10-1 Roppongi 6-chome Minato-ku, Tokyo 106-6147



## **11. Inquiries, Opinions, Complaints**

Goldman Sachs will make effort to respond to your inquiries, opinions or complaints etc. regarding our handling of Personal Information sincerely and without delay. Please contact in writing the following contact person.

Chief Personal Data Controller

Goldman Sachs Japan Co., Ltd

Roppongi Hills, 10-1 Roppongi 6-chome Minato-ku, Tokyo 106-6147

## **12. Approved Personal Information Protection Organization**

Goldman Sachs is a member of the Japan Securities Dealers Association (JSDA) and the Financial Futures Association of Japan (FFAJ) which are Approved Personal Information Protection Organizations approved by Personal Information Protection Commission (PPC). Personal Information Office of the JSDA and Personal Information and Complaints Office of FFAJ will receive your complaints with regard to handling of Personal Information of their members.

[Contact]

JSDA Personal Information Office Tel: 03-6665-6784

[\(http://www.jsda.or.jp/\)](http://www.jsda.or.jp/)

FFAJ Personal Information and Complaints Office Tel: 03-5280-0881

[\(http://www.ffaj.or.jp/\)](http://www.ffaj.or.jp/)

\* RSA SecurID is a trademark owned by RSA Security Inc.

Established on October 1, 2006

Revised on July 2, 2007

Revised on September 30, 2007

Revised on December 24, 2009

Revised on February 1, 2010

Revised on July 22, 2010 (The commencement date shall be July 1, 2010).

Revised on April 1, 2011

Revised on April 1, 2013

Revised on October 9, 2013

Revised on August 8, 2014

Revised on February 10, 2015

Revised on October 5, 2015

Revised on December 26, 2016

Revised on May 30, 2017

Revised on October 29, 2018 (Approved Date: October 24, 2018)

Revised on March 1, 2019

Revised on October 16, 2020

## Disclosure Procedure under Privacy Policy

Goldman Sachs Japan Co., Ltd.

1. We process your request to provide notification of purpose of use of your Retained Personal Data, to disclose the Retained Personal Data or to suspend the use thereof, in accordance with the provisions of Article 27(2), Article 28(1), or Article 30(1) or 30(3) of the Law concerning Protection of Personal Information (hereinafter referred to as the “Law”) as follows:

- (1) All requests for notification of purpose of use, disclosure, and suspension of use of your Retained Personal Data shall be in writing and addressed to  
  
Chief Personal Data Controller  
  
Goldman Sachs Japan Co., Ltd.  
  
Roppongi Hills Mori Tower,  
  
10-1, Roppongi 6-chome, Minato-ku, Tokyo 106-6147, Japan
- (2) The written request shall contain the date of the request, name, address, telephone number, date of birth, division name, account number of the person who is making the request, and the details of the relevant Retained Personal Data such as place of employment (name of the place of employment or occupation and telephone number), positions of securities held in custody (content of securities held in custody, positions) and information related to the transaction history.
- (3) When you make a request in person, you shall submit at least two kinds of documents that confirm your identity (e.g., a copy of your driver’s license, passport, or otherwise) in accordance with the provisions of the Law for Prevention of Transfer of Criminal Proceeds.
- (4) A fee of JPY1,000 (not including tax) shall be payable for each request for notification of purpose of use or disclosure of your Retained Personal Data.
- (5) When you make a request through your agent, you shall submit at least two kinds of documents that confirm the identity of your agent as well as two kinds of documents that confirm your identity.
- (6) When you make a request through your agent, you shall submit a power of attorney or other written authorization therefore. If there is any reason to doubt your authorization for the agent, we may confirm by telephone or other means your intention to authorize the agent.

- (7) Our response will be given without delay by mail or otherwise. When you have made a request for notification through your agent, our response will be sent to you unless otherwise requested by your legal agent or indicated in a written authorization that the agent is to receive our response.
- (8) Notification of purpose of use or disclosure of Retained Personal Data may not be provided if any one of the events below occurs. In such cases, we will notify you of the reason why such notification or disclosure cannot be provided. Even if it is decided not to provide notification or disclosure, a fee as prescribed shall be payable.
  1. Your identification cannot be confirmed;
  2. Your authorization for the agent cannot be confirmed (in the case of making a request through your agent);
  3. There is a flaw in the document(s) submitted;
  4. The fee is not paid;
  5. The category of the information requested by you does not fall under the category of the Retained Personal Data;
  6. The disclosure may cause death, personal injury, property damage, or other infringement of rights and interests of you or any third party;
  7. The disclosure may significantly interfere with the proper performance of our business operation; or
  8. The disclosure may breach any provision of other laws and regulations.

2. We process your request to correct your Retained Personal Data in accordance with the provisions of Article 29(1) of the Law as follows:

- (1) When you request a correction of your Personal Data, you shall follow the disclosure procedure as described above in order to confirm that the Retained Personal Data is not accurate and true.
- (2) All requests for a correction of your Personal Data shall be in writing and addressed to

The Chief Personal Data Controller.

Goldman Sachs Japan Co., Ltd.

Roppongi Hills Mori Tower,

10-1, Roppongi 6-chome, Minato-ku, Tokyo 106-6147, Japan

- (3) The written request shall contain the date of the request, name, address, and telephone number, date of birth, division name, account number of the person who is making the request; and the details of the relevant Retained Personal Data as well as a document certifying the accuracy of the information to be corrected.
- (4) When you make a request in person, you shall submit at least two kinds of documents that confirm your identity (e.g., a copy of your driver's license, passport, or otherwise) in accordance with the provisions of the Law for Prevention of Transfer of Criminal Proceeds.
- (5) When you make a request through your agent, you shall submit at least two kinds of documents that confirm the identity of your agent as well as two kinds of documents that confirm your identity.
- (6) When you make a request through your agent, you shall submit a power of attorney or other written authorization therefore. If there is any reason to doubt your authorization for the agent, we may confirm by telephone or other means your intention to authorize the agent.
- (7) When we have corrected all or any part of the Retained Personal Data according to your request or when we have decided not to correct the data, we will notify you of that fact in writing by mail or otherwise (if corrected, the details of the correction shall be included). If we decided not to correct the data, we will endeavor to explain the reasons thereof by showing the reasons and facts of the decision. When you have made a request for a correction through your agent, our response will be sent to you unless otherwise requested by your legal agent or indicated in a written authorization that the agent is to receive our response.

This is a translation of the original policy which is in Japanese. There may be inaccuracies in this translation and, in the event of any inconsistency between this translation and the original Japanese version, the original Japanese version shall prevail.