

**GOLDMAN SACHS**  
**PRIVACY POLICY – EMPLOYMENT CANDIDATE PERSONAL INFORMATION**

*Effective Date: December 31, 2022*

Your privacy is important to us. The purpose of this Privacy Policy (as updated from time-to-time, “**Privacy Policy**”) is to explain our practices with respect to the collection, use, disclosure and safeguarding of your personal information. This Privacy Policy applies to personal information collected: (i) when you apply for or inquire about employment with Goldman Sachs, including through employment applications submitted at [www.goldmansachs.com/careers](http://www.goldmansachs.com/careers) and any communication with us regarding any position advertised on the same, (ii) on any other website associated with the above that is owned or operated by us, and on which this Privacy Policy appears or is linked (romanettes (i) and (ii) collectively the "Site"), (iii) when you seek to provide services to us as a contractor, either directly or through a third-party employing entity, (iv) in the context of our recruitment, background check, and onboarding processes, prior to an individual’s first day of employment with us, and (v) when a third party provides your information to us, such as when a recruiter, staffing agency, third-party company, or another individual contacts us with information about a potential candidate. This Privacy Policy applies only to our practices in the United States.

These links will take you to sections of this Privacy Policy explaining the following topics and, together with the information contained in the below sections, constitute our Notice of Collection:

- [The categories of personal information we collect;](#)
- [The purposes for which personal information are collected and used;](#)
- [Whether we sell or share, as defined under the California Consumer Privacy Act, as amended by the California Privacy Rights Act \(collectively, the “CCPA”\), personal information and a description of your right to opt out;](#) and
- [The criteria we use to determine how long to retain personal information.](#)

**IMPORTANT TERMS**

We want you to understand the following defined terms that we use throughout this Privacy Policy. When we use “**Goldman Sachs**”, “**we**”, “**us**”, or “**our**”, we mean the United States offices of The Goldman Sachs Group, Inc. and its subsidiaries and affiliates that may employ an individual. Without limitation, these subsidiaries and affiliates may include Goldman Sachs & Co. LLC, Goldman Sachs Services LLC, Goldman Sachs Bank USA, and United Capital Financial Advisors, LLC.

**OTHER GOLDMAN SACHS CAREERS PRIVACY NOTICES**

If you apply for a role or engagement with any members of the Goldman Sachs Group, Inc. outside of the United States, a different privacy policy or notice may be applicable. For additional information, please visit the [Goldman Sachs – Careers Privacy Notices](#) website.

**WHAT PERSONAL INFORMATION WE COLLECT AND GENERATE**

We may collect or generate personal information about you, or a third party upon your instruction, in a number of ways and from a number of sources. For example, we may collect personal information from the following sources:

- **Before you apply**, we may collect information from you when you interact with us in connection with our recruitment activities; and from third parties, such as a recruiter or referrer.
- **When you apply**, we may collect information from you directly in connection with the employment application you complete or during the interview process.
- **When you visit our Site**, we may automatically collect digital information using Cookies, Web Beacons, page tags, pixels or similar tools that we and our service providers and other third parties have set.
- **When we assess your application**, we may collect information about you from third parties, such as recruiters, references, and former employers. We may also use background check services to collect additional information.
- **When you communicate with us**, we may collect personal information about you directly and indirectly such as through telephone calls or email.

The following is a list of categories of personal information, along with some descriptions and examples, that we may collect or generate through each of the processes described above. We may not collect information from all categories for all candidates. Some data elements will fit into multiple categories.

- **Personal Identifiers:** This includes name (e.g. title, forename, middle name(s), surname, birth name, preferred name, any additional names); home contact details (e.g. address, email); photograph; mother's maiden name; name of spouse; next-of-kin; dependent contact information; work contact details (e.g. address, email, telephone number).
- **Government Identifiers:** This includes Social Security number; state identification card; tax identification number; national identification number; other government-issued identification number (such as driver's license, passport, or alien registration number); related information.
- **Professional or Employment-Related Information:** This includes languages spoken; hobbies; position held; employment status; work biography and qualifications; reporting line; job title; job description; worker ID and any other ID; work location; default language; time zone and currency for location; employee/contingent worker type; hire/contract begin and end dates; full or part time indicator; date of expiry or termination of your employment or engagement; reason for termination; last day of work; references; status (e.g. active, inactive, terminated); reason for any change in role and the date of change; information you may choose to disclose regarding health or wellness; CV or resume; application; information compiled in undertaking a background check (which may include criminal record data; financial stability checks and reviews of professional and social media); professional and academic background (including previous role information); photograph; qualifications; interview and assessment data; regulated status and any regulatory references; registration with any applicable regulatory authority; any relevant certificates; information regarding any issues that may affect professional propriety; compliance approval status and any conflict of interest disclosure; compensation information (including salary; hourly plan; contract pay information as applicable; allowance; bonus and merit plans); data such as grade; tax information; payroll information, benefit plans; third party benefit recipient information; allegations; investigations and proceeding records and outcomes.
- **Protected Classifications Characteristics:** This includes age; immigration information (including

passport details and place of birth); citizenship; nationality; second nationality; civil/marital status; sexual orientation; ethnicity and race; data relating to actual and alleged criminal offences and convictions.

- **Demographic Information:** This includes date of birth; gender; country of residence; tax residence.
- **Financial Information:** This includes bank account details; account positions and other information regarding accounts and investments at Goldman Sachs and other financial institutions; investor qualifications; tax classification and information and other information regarding financial circumstances and required disclosures; and information needed for compliance with policy (management of conflicts with Goldman Sachs roles); in some cases, we may collect information from you about financial accounts and investments of family and household members.
- **Medical and Health Information:** This includes information about short or long term disabilities or illnesses; accommodations; and information collected for purposes of workforce safety, such as vaccination records and test results in the context of a public health crisis or emergency, e.g., COVID-19.
- **Biometric Information:** This refers to fingerprints and faceprints, which are digitally recorded representations of a face (we use this to identify fraudulent activity and to enhance security);
- **Device and Online Identifiers and Related Information:** This includes Internet Protocol (IP); mobile telephone number; email address; professional and social media profiles; account user name; session and other application and other device identification information.
- **Internet, Application, and Network Activity:** This includes the content of your communications with us (such as via text messages and emails); voice and video data; clickstream/online website tracking information; data related to user activity (via pixels, cookies, social media information, user logs or other similar techniques); transaction data and related details.
- **Location Data:** This includes building access and system login records.
- **Sensory Data:** This includes closed circuit television (CCT) footage; telephone logs and recordings; video; voice over and audio as part of other electronic media and other content types.
- **Sensitive Personal Information:** Some of the personal information that we collect and generate and which is described above is considered sensitive personal information. This includes Social Security, driver's license, state identification card, and passport numbers; racial or ethnic origin; and biometric information.

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

## HOW WE USE PERSONAL INFORMATION

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

- **Applicant/candidate attraction, assessment and selection:** This includes activities in connection with recruitment, vetting and background checks (includes credit checks, right to work verification, identity

fraud checks, criminal record checks, relevant employment history, relevant regulatory status and professional qualifications).

- **Promoting diversity and preventing discrimination:** This includes activities we undertake as an Equal Opportunities employer; monitoring programs to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws; monitoring the effectiveness of those programs.
- **Management and improvement of Goldman Sachs systems and operations:** This includes improvements to Goldman Sachs Human Capital Management (“HCM”) systems; management of technology systems and processes; operational changes; conducting surveys for benchmarking and opportunity identification; changing system and facilities access.
- **Prudent business management and protecting and enforcing the rights of Goldman Sachs:** This includes general management and reporting activities necessary to attract and retain staff; other firmwide processes; and business continuity planning activities.
- **Protection of business, clients, staff and systems:** This includes protecting private, confidential and proprietary information of Goldman Sachs, Goldman Sachs affiliates and our employees, clients and third parties; monitoring technology systems to protect and maintain the integrity of such systems and infrastructure; ensuring compliance with relevant technology policies; locating information through searches where needed for a legitimate business purpose; taking steps designed to protect the health and safety of our staff and workplace environment; and detecting and responding to fraud.
- **Meeting our regulatory and compliance obligations and preventing crime:** This includes accounting, tax, insurance, and legal compliance; regulatory compliance checks; making disclosures to, and complying with requests from public authorities, regulators or governmental bodies across our global group; investigating conduct and preventing fraud and crime; activities to enforce our legal rights and meet our obligations; for any purposes in connection with any legal claims made against Goldman Sachs; actions we take to comply with lawful requests by public authorities, disclosure requests, or where otherwise required by applicable laws, court orders, government regulations, or regulatory authorities; satisfying our regulatory obligations to supervise the persons employed or appointed by us to conduct business on our behalf, including monitoring a wide range of activities and behaviors.
- **Other permitted uses:** We may use your personal information for any other purpose that we disclose at the time you provide, or when we collect, your information and other purposes permitted by applicable law. We may also use information that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable laws and regulations.

## TO WHOM WE DISCLOSE PERSONAL INFORMATION

We disclose personal information as set forth below:

- **Goldman Sachs affiliates:** We may disclose personal information to members of the Goldman Sachs family of companies for purposes permissible under applicable laws and regulations.
- **Vendors:** We may disclose personal information to non-affiliated companies that perform support services for us, such as onboarding vendors, auditing, accounting, risk management, fraud analysis, identity verification, security services, support, mail services, email delivery, and information technology.

- **Benefit providers:** We may disclose personal information to providers who offer retirement, health, and other benefit programs, services, or products to you and your dependents or beneficiaries; with social security and insurance agencies.
- **Governmental authorities and regulators:** We may disclose personal information to governmental authorities and regulators, including self-regulatory organizations, to comply with our legal and self-regulatory obligations.
- **Legal process and emergency situations:** We may disclose to third parties as permitted by, or to comply with, applicable laws and regulations. Examples include responding to a subpoena or similar legal process, protecting against fraud and cooperating with law enforcement or regulatory authorities. We may also disclose information if we believe it is necessary or appropriate to protect our rights, property or safety, or the rights, property or safety of our employees, customers or others, or to enforce our contractual rights.
- **Corporate transactions:** In the event of a corporate transaction, such as a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of our assets or liabilities, some of the personal information that we hold may be among the assets or liabilities transferred to a buyer or other successor. We may also transfer personal information to another entity or its affiliates or service providers in connection with, or during negotiations of, any merger, acquisition, sale of assets or liabilities or any line of business, change in ownership control or financing transaction.
- **Other permitted sharing:** We also may disclose personal information to others where permissible under applicable laws and regulations or when you provide your consent or direction.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

“Cookies” are small text files that may be placed on your browser when you visit websites. When you quit your browser, some Cookies are stored in your computer’s memory, while some expire or disappear. Cookies allow your browser to remember some specific information that the web server can retrieve later on.

“Web Beacons”, also known as an Internet tags, pixel tags or clear GIFs, are a type of technology placed on a webpage or in an email. Web Beacons are generally used to transmit information back to a web server.

We and our Vendors may use Cookies, Web Beacons, session replay, device IDs and similar technologies for a number of business purposes, such as to remember your preferences, personalize your experience, understand how you use and interact with our Site, for security purposes, and to improve the Site. These technologies may collect information about your browser/device and your use of our Site, such as the time/date of access and time spent on the Site, pages visited, language preferences, whether you open our emails, and other traffic data.

You may be able to configure your web browser to decline Cookies and/or configure your email client to not load Web Beacons in emails. Please note that, if you choose to decline Cookies, certain features of our Site may not function properly or may not be accessible to you.

## **DO NOT TRACK**

We do not respond to "Do Not Track" browser-based technology.

## **HOW WE PROTECT INFORMATION**

We take the security of personal information, including Social Security numbers, seriously and work to limit access to personal information to authorized employees, agents, contractors, or vendors. We also maintain physical, electronic, and procedural safeguards designed to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure while in our possession.

## **RETENTION OF PERSONAL INFORMATION**

We retain personal information for varying time periods depending on our relationship with you and the status of that relationship. When determining how long to keep personal information, we take into account our legal and regulatory obligations and our legitimate business interests (such as preventing fraud, responding to regulatory or supervisory inquiries, and establishing, exercising or defending legal claims, disputes or complaints).

## **CONTACT US**

If you need to contact us for more information about this Privacy Policy or because you have other questions or concerns, you may do using the following information for Goldman Sachs HR Direct Americas: 1 (877) 454-7426 or 1 (847) 883-1048.

## **UPDATES TO THIS PRIVACY POLICY**

We may change this Privacy Policy from time-to-time. If we make changes to this Privacy Policy, we will update the “Effective Date” at the top of this page. Any changes to this Privacy Policy will become effective when posted unless indicated otherwise.

## **CALIFORNIA RESIDENTS**

California residents should be aware that this section does not apply to:

- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act and its implementing regulations, the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994; or
- Other information subject to a CCPA exception.

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

We may create, maintain and use deidentified information of California residents, and if we do, we will not attempt to reidentify that information unless permitted by California law.

### Your Rights

California residents have certain rights in relation to their personal information pursuant to the CCPA. These include the right to:

- Information about the personal information that we collect about you and the manner in which we use, process and disclose that information;
- Obtain the specific pieces of personal information that we have collected about you;
- Effective January 1, 2023, correct inaccurate personal information that we maintain about you;
- Delete certain personal information that we have collected from you;
- Opt-out of the sale and sharing of your personal information to third parties under certain circumstances; and
- Not be discriminated against as a result of exercising any of the aforementioned rights.

Although we collect certain categories of sensitive personal information as described in the "What Personal Information We Collect and Generate" section, we do not use sensitive personal information in ways that the CCPA permits you to limit.

### Selling and Sharing

The CCPA requires that we describe disclosures of personal information where:

- We receive monetary or other valuable consideration (i.e., selling, as defined under the CCPA); or
- Effective January 1, 2023, we disclose personal information about you through our websites to a third party for cross-context behavioral advertising (i.e., sharing, as defined under the CCPA).

We do not sell or share, and have not sold or shared in the preceding 12 months, personal information to third parties. We do not knowingly sell or share the personal information of minors under 16 years of age.

### Exercising Your Rights

If you would like to discuss or exercise such rights to access, delete or correct your personal information, please contact us via email at [here](#) or phone at 1-844-930-0648. As part of submitting a request, we may ask for your name, email address, phone number, date of birth, and mailing address.

The CCPA requires us to verify the requests we receive from you when you exercise certain of the rights listed above. To verify your request, we may check the information you provide us in your request against third party identity verification tools, as well as verify that any personal information relates to you. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized representative to exercise certain of the rights listed above on your behalf by providing the authorized representative with power of attorney pursuant to the California Probate Code or by executing other documentation we may require, and the representative may make the request on your behalf by following the instructions above. If an authorized representative submits a request on your behalf, we may contact you to verify that they represent you.