



## GOLDMAN SACHS FAIR PROCESSING NOTICE

### PURPOSE AND APPLICATION OF THIS NOTICE

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

1. our clients and prospective clients, where these are individuals rather than legal entities ("**natural person clients**");
2. the beneficial owners, partners and directors of our legal entity, partnership or fund clients and prospective clients;
3. the settlors, trustees, beneficiaries and protectors of the trusts (or similar legal arrangements) to which we provide services or to which we may seek to provide services;
4. advisors, managers, staff, intermediaries and other representatives of our clients and prospective clients ("**representatives**"); and
5. 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 the European Union's General Data Protection Regulations or any applicable data protection laws, and as part of our commitment to processing personal data transparently.

This notice applies to you if (1) the Goldman Sachs 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 ("**GS**", "**we**", or "**us**") is established in the European Union, the United Kingdom or Switzerland, or (2) you are located in the European Union 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.

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This notice provides information on:

- the GS entity or entities responsible for processing your personal data;
- the personal data we collect from you and from third parties about you;

- the purposes for which personal data is processed and our 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.

### CONTACT DETAILS

If you would like to contact us regarding the processing of your personal data, please contact your Private Wealth Management team or please contact our UK and German data protection officers at [gs-privacy@gs.com](mailto:gs-privacy@gs.com). You can also contact our UK data protection officer at: Plumtree Court, 25 Shoe Lane, London EC4A 4AU. You can also contact our German data protection officer at: Marienurm, Taunusanlage 9-10, 60329 Frankfurt am Main, Germany.

*Important note: if you wish to contact Goldman Sachs Bank AG (Swiss Bank) or the Luxembourg branch of Goldman Sachs Bank Europe SE (Luxembourg Branch):* emails sent to [gs-privacy@gs.com](mailto:gs-privacy@gs.com) will be received by persons and technology systems located outside of Switzerland and Luxembourg, in jurisdictions where Swiss and Luxembourg confidentiality and/or secrecy regulations are not applicable. By contacting the data protection officer you will release the Swiss Bank and Luxembourg Branch from all statutory or contractual secrecy obligations (including Swiss and Luxembourg banking secrecy) to the extent required for the purposes of this notice. If you prefer that your communication be received within Switzerland, please contact [gsbankprivacy@gs.com](mailto:gsbankprivacy@gs.com). If you are a prospective client or a representative or any other person associated with a prospective client of the Luxembourg Branch and you prefer that your communication be received within Luxembourg please contact 32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg.

### 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 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 (a "**GS affiliate**") for their own independent purposes, these GS affiliates may also be data controllers 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 and GS affiliates will, depending on the relationship we have with you and the products and services we provide (or seek to provide), process certain personal data relating to you and people connected to you, including the data listed below.

#### **A. PROFESSIONAL AND PERSONAL DETAILS**

##### *Applicable to all recipients of this notice*

We process your name and contact information. 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.

##### *Applicable to client representatives and prospective client representatives*

The contact details we process will be your professional contact details. In addition, we 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.

#### **B. FINANCIAL DETAILS AND INVESTOR PROFILE, INCLUDING TAX-RELATED INFORMATION**

##### *Applicable to natural person clients, beneficial owners, partners, trustees, protectors and settlors*

This may include your bank account details, financial standing and history, credit rating, the nature of our mandate and any discretion you permit us, investment preferences, restrictions and objectives (including your personal circumstances, where relevant), job title, tax-related information and codes, information relating to 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.

##### *Applicable to guarantors*

This may include details of your financial standing and the guarantee you provide.

#### **C. RECORDS CONNECTED WITH SERVICE PROVISION**

##### *Applicable to all recipients of this notice*

This may include:

- notes from interactions, meetings and conversations that you have with us or our affiliates (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 telephone calls);
- records of correspondence and records of use of our websites, and/or our brokerage, financial or other services made available electronically by GS to you and/or the client you represent (including data transmitted by your browser and automatically recorded by our server);
- account details, records of agreements, payments, investments, trades and other transactions that contain your name or other personal data, and any identifiers that we or our affiliates assign to records associated with you; and
- details regarding your **health** if you provide us with this information in connection with account management or any needs you have when meeting or interacting with us.

#### **D. INFORMATION USED FOR BACKGROUND CHECKS, MONITORING AND REGULATORY COMPLIANCE**

##### *Applicable to beneficiaries only*

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 and other details enabling us to meet our regulatory obligations, such as your date of birth, nationality and address.

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

We may process data such as your date of birth, nationality, country of residence, documents required for anti-money laundering checks and monitoring (including a copy of your passport or national identity

card), records of any required disclosures, details of the origin of your wealth and of restrictions on your ability to invest (such as any insider status or political exposure), and other details of your affiliations and/or of our relationship with you as necessary to enable us to establish and meet applicable regulatory reporting requirements and identify any conflicts of interest.

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

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 trade or transaction counterparts, credit reference agencies, public registers (such as beneficial ownership registers), financial crime screening databases, fraud prevention agencies, and persons or entities instructed by you to provide us with your personal data.

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

In addition to processing data on your representatives (as set out in this notice), in certain circumstances we may process personal data of persons connected to you but with whom GS does not directly communicate, such as dependants and family members. Additional information relating to our processing of their personal data is available online here: [www.gs.com/privacy-notice](http://www.gs.com/privacy-notice). 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 and GS affiliates always process your personal data for a specific purpose and process 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**

This includes processing 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**

Processing personal data to ensure the proper provision of our products and services, and keeping 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**, this includes processing details enabling us to honour your rights (including eligibility to payments).

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

This includes compiling and utilising internal reports and notes, managing the client file, conducting risk reviews, allowing you to access our websites and secure online platform and other technological services, and, where applicable, managing any agreement or arrangement between us.

#### **E. COMMUNICATING WITH YOU**

Processing data required to communicate with you in person, by telephone, 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 carrying out billing-related and payments administration; staff and access management; preparing business reports and accounts; operating information technology systems; archiving and backing up data; and transferring personal data.

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

This includes conducting market research, analysis of client and prospective client preferences, transactions and market trends, evaluating potential new products and services, evaluating the effectiveness of our marketing, as well as testing new systems and upgrading existing systems. To the extent permitted by law, this may include recording telephone conversations, and monitoring emails and your use of our websites and of brokerage, financial or other services made available to you by GS electronically to assess, maintain and improve the quality of our services.

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

This includes assessing, monitoring and managing financial, reputational and other risk, conducting audits of our business, liaising with our regulator, protecting data used by our business and establishing, 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.

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

This includes:

- performing prudential and regulatory compliance checks on an ongoing basis;
- account and transaction monitoring, transaction reporting, tax reporting;
- monitoring our management of client accounts and client interactions;

- 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;
- the extent permitted or required by law, recording telephone conversations and monitoring emails and your use of our websites and of brokerage, financial or other services made available to you by GS electronically; and
- *if you are a client of Goldman Sachs Bank AG (Swiss Bank), or the Luxembourg branch of Goldman Sachs Bank Europe SE (Luxembourg Branch) 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**

The personal data processing described in this notice may be:

- A. necessary in order to comply with our legal obligations under certain laws;

*This applies to regulatory compliance checks referred to in parts A and J of section 3.1, assessment of client suitability referred to in part B of section 3.1, record keeping described in part E of section 3.1, reporting and creation of accounts referred to in part F of section 3.1, business management and regulatory liaison activities referred to in part H of section 3.1, and 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;

*If you are a natural person client, this applies to the majority of the processing described in parts A – F of section 3.1 of this notice. 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 (as described below); or

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

The "legitimate interests" referred to in section 3.2(c) above are:

- the processing purposes described in A – J of section 3.1 of this notice 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 (ii) comply with our legal obligations under certain laws;
- meeting and complying with our accountability requirements and regulatory obligations globally; and
- exercising our fundamental rights and freedoms, including our freedom to conduct a business and right to property.

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

***Applicable to Principals only (see Appendix 2 for list of Principals)***

In addition, 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 otherwise (ii) on the basis that this processing is necessary for reasons of the substantial public interest in preventing financial crime.

***Applicable to all recipients of this notice***

In addition, where we process data that you have provided to us regarding your health for the purposes of (i) managing your account in accordance with your wishes and interests (primarily relevant for a natural person client) or (ii) meeting your needs in relation to any meetings or interactions with you (such as arranging wheelchair access), we will do so with your explicit consent (which we obtain from you from time to time).

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

#### ***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 of this notice).

#### **4. YOUR CONSENT**

To the extent 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 relationship manager or our data protection team at [gs-privacy@gs.com](mailto:gs-privacy@gs.com). Alternatively, if you prefer that your communication be received within Switzerland please contact [gsbankprivacy@gs.com](mailto:gsbankprivacy@gs.com) or, if you are a prospective client or a representative or any other person associated with a prospective client of the Luxembourg Branch and you prefer that your communication be received within Luxembourg please contact 32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg.

Where you have withdrawn consent but GS retains the personal data we will only continue to process that personal data where necessary for those purposes where 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 data recipients listed below. Depending on our relationship with you, we may share your personal data with:

- A. In respect of client representatives, the GS client you represent;
- B. GS affiliates (including custodians), external custodians and strategic partners;
- C. payment providers/recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;

- D. 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;
- E. swap or trade repositories, swap data repositories or global trade repositories (or similar facilities or institutions), and stock exchanges;
- F. clearing houses, and clearing or settlement systems; and specialised payment networks, companies or institutions such as SWIFT;
- G. 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);
- H. GS' lawyers, auditors and accountants and others providing professional advice;
- I. relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws of any relevant jurisdiction;
- J. your agents, representatives and other persons acting on your behalf or to whom you instruct or authorise us to disclose your data;
- K. 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;
- L. 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
- M. to 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.

## 6. INTERNATIONAL TRANSFER

The data sharing listed in this notice may involve the transfer of personal data to any country in which GS or a GS affiliate conducts business or has a service provider or to other countries for law enforcement purposes (including, without limitation, the United States of America and other countries whose data privacy laws are not as stringent as those in effect in the United Kingdom, Switzerland or the European Union).

GS ensures 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 service providers (including other GS affiliates) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant data exporter. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting [gs-privacy@gs.com](mailto:gs-privacy@gs.com). Alternatively, if you prefer that your communication be received within Switzerland please contact [gbankprivacy@gs.com](mailto:gbankprivacy@gs.com) or, if you are a prospective client or a representative or any other person associated with a prospective client of the Luxembourg Branch and you prefer that your communication be received within Luxembourg please contact 32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg.

## 7. DIRECT MARKETING

You are entitled by law to object to use of your personal data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. You can opt-out of receiving any marketing emails by clicking the "unsubscribe" link in any such emails, or by emailing us at [gs-privacy@gs.com](mailto:gs-privacy@gs.com). If you prefer that your communication be received within Switzerland, email us at [gbankprivacy@gs.com](mailto:gbankprivacy@gs.com) or, if you are a prospective client or a representative or any other person associated with a prospective client of the Luxembourg Branch and you prefer that your communication be received within Luxembourg please contact 32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg.

## 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:** To the extent that GS is relying

upon the lawful basis of legitimate interest to process your personal data, then you have the right to object to such processing, and GS must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where GS needs to process the data for the establishment, exercise or defence of legal 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).
- 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 of this notice.
- 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 sending an email to [gs-privacy@gs.com](mailto:gs-privacy@gs.com) or if you prefer that your communication be received within Switzerland, at [gsbankprivacy@gs.com](mailto:gsbankprivacy@gs.com) or, if you are a prospective client or a representative or any other person associated with a prospective client of the Luxembourg Branch and you prefer that your communication be received within Luxembourg please contact 32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg. Alternatively you can send a written request to the GS entity with which you have a relationship, clearly marked "Individual Rights – FAO Private Wealth Management Privacy Steward", using the address listed for that entity 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.

## 9. RETENTION OF PERSONAL DATA

GS and GS affiliates retain personal data for varying time periods in order to assist us in complying with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reasons.

GS and GS affiliates retain your personal data for the period of time required for the purposes for which it was collected 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 Fair Processing Notice, the following additional information also applies. GSBE is subject to various retention and documentation requirements

pursuant to inter alia, the German Commercial Code (Handelsgesetzbuch- “HGB”) and the Tax Code (Abgabenordnung- “AO”). The retention and documentation periods specified therein 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”) whereby 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 execute an existing contract and may have to terminate it.

The legal obligations include in particular 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 and 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, 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**

<b>GS ENTITY</b>	<b>HEAD OFFICE OR BRANCH OF GS ENTITY (IF APPLICABLE)</b>	<b>CONTACT DETAILS</b>
GOLDMAN SACHS INTERNATIONAL	London (Head Office)	Plumtree Court 25 Shoe Lane London EC4A 4AU
	Dubai (Branch)	
GOLDMAN SACHS INTERNATIONAL BANK		
GOLDMAN SACHS BANK EUROPE SE	Frankfurt (Head Office)	Marienturm, Taunusanlage 9-10, 60329 Frankfurt am Main. Germany
	Paris (Branch)	
	Dublin (Branch)	
	London (Branch)	
	Milan (Branch)	
	Madrid (Branch)	
	Luxembourg (Branch)	32-34 Boulevard Grande-Duchesse Charlotte, L-1330, Luxembourg, Grand Duchy of Luxembourg.
GOLDMAN SACHS BANK AG		Claridenstrasse 25 8021 Zürich Switzerland
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

**Local Representatives: Until 31 December 2020:** the local representative of Goldman Sachs Bank AG and Goldman Sachs & Co. LLC within the European Union and the UK is Goldman Sachs International. The contact details of Goldman Sachs International are as set out above. **From 1 January 2021:** 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.

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