

**GOLDMAN SACHS ASSET MANAGEMENT L. P.**  
**PRIVACY POLICY**

**Effective October 8, 2020**

Your privacy is important to us. The purpose of this Privacy Policy is to explain the practices of Goldman Sachs Asset Management L.P. and its affiliates and subsidiaries (“Goldman Sachs”, “GS”, or “we”) with respect to the collection, use, disclosure and safeguarding of your personal information. This Privacy Policy applies to information collected through our websites that link to this policy which include but are not limited to: [gsam.com](http://gsam.com), [gsamfunds.com](http://gsamfunds.com), [GoldmanSachsBDC.com](http://GoldmanSachsBDC.com), and [Aptitudeinvest.com](http://Aptitudeinvest.com) (individually and collectively “the Site”),<sup>1</sup> any mobile applications associated with the Site (the “Mobile Applications”) and all other GS online offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology (collectively, the “System”), as well as information we may collect from you offline in connection with the System.

**Our Collection, Use, and Disclosures Practices**

Below, we describe the categories of personal information we collect, how we use the information, the sources of the information, and the types of parties with whom we share the information.

<b>Category: Personal Identifiers</b>
<i>Examples of Data Collected</i>
Name, address, email address, telephone number, identifiers assigned to you for our internal use, signature, publically available images
<i>Why Do We Collect This Data?</i>
Account opening, communicating with you, providing products and services to you, carrying out operational and administrative functions, marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, internally generated information, third-party vendors that provide information to assist with marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With</i>
GS affiliates, non-affiliated companies that help us operate the System, such as by performing support services for your account or processing your transactions with us or our affiliates, vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Device and Online Identifiers and Related Information</b>
<i>Examples of Data Collected</i>
Internet Protocol (“IP”) address, account user name / log-in, device information, device type
<i>Why Do We Collect This Data</i>
Providing products and services to you, communicating with you, carrying out operational and administrative functions, identifying products that may be of interest to you, helping us improve our products, services and operations, preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your device, data we collect by placing a cookie on your browser or application
<i>Who Do We Share Data With</i>
Vendors who help us operate the System, such as by assisting with preventing financial crime and providing analytics, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent

<b>Category: Demographic Information</b>
<i>Examples of Data Collected</i>
Date of birth, family information, information about your personal and professional associates, your interests/preferences
<i>Why Do We Collect This Data?</i>
Account opening, prudently managing our business and protecting and enforcing our rights, understanding your needs and offering products and services to you, managing our relationship with our clients and connected parties, marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, internally generated information, third-party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With</i>
GS affiliates, non-affiliated companies that help us operate the System, such as by performing support services for your account or processing your transactions with us or our affiliates, vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have obtained your prior consent
<b>Category: Financial Information</b>
<i>Examples of Data Collected</i>
Account number(s) and other information regarding accounts at other financial institutions, your authority over, beneficial interest in and other information about entities you are associated with that hold accounts with us, public and private company affiliations, philanthropic affiliations and activity, source of wealth information, expected activity within your account, investor qualifications, investment goals and experience, net worth and liquidity needs, income, tax classification and other information regarding your financial circumstances
<i>Why Do We Collect This Data?</i>
Account opening, carrying out operational and administrative functions, understanding your needs and offering products and services to you, prudently managing our business and protecting and enforcing our rights, managing our relationship with our clients and connected parties, marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, internally generated information, your service providers (including external banks and custodians), third-party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With</i>
GS affiliates, non-affiliated companies that help us operate the System, such as by performing support services for your account or processing your transactions with us or our affiliates, vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent

<b>Category: Government Identifiers</b>
<i>Examples of Data Collected</i>
Social Security number, tax identification number, national identification number, other government-issued identification number (such as driver's license, passport, or alien registration number)
<i>Why Do We Collect This Data?</i>
Account opening, carrying out operational and administrative functions, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents
<i>Who Do We Share Data With</i>
GS affiliates, vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data; any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Legally Protected Classification Characteristics</b>
<i>Examples of Data Collected</i>
Age, citizenship nationality, marital status, association with senior political officials and/or executives of government owned enterprises
<i>Why Do We Collect This Data?</i>
Account opening, carrying out operational and administrative functions, understanding your needs and offering products and services to you, prudently managing our business and protecting and enforcing our rights, meeting our regulatory and compliance obligations and preventing financial crime, marketing
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, third-party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With</i>
GS affiliates, vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Internet, Application, and Network Activity</b>
<i>Examples of Data Collected</i>
Emails, , data related to user activity, e.g. browser visits and how you engage with our communications
<i>Why Do We Collect This Data?</i>
Communicating with you, helping us improve our products, marketing, services and operations, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, your device(s), data we collect through cookies, pixels, web beacons, and similar technologies
<i>Who Do We Share Data With</i>
Vendors who help us operate the System, such as by assisting with preventing financial crime, or improving our user experience, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent

<b>Category: Location Data</b>
<i>Examples of Data Collected</i>
IP geo-location from which you connect to the internet when using our website
<i>Why Do We Collect This Data?</i>
Helping us improve our products, services and operations, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
Data we collect by placing a cookie on your browser
<i>Who Do We Share Data With</i>
Vendors who assist with preventing financial crime or improving user experience, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Audio Data</b>
<i>Examples of Data Collected</i>
Audio recordings of telephone conversations regarding account activity
<i>Why Do We Collect This Data?</i>
Helping us improve our services, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You
<i>Who Do We Share Data With</i>
GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
<b>Category: Professional or Employment-Related Information</b>
<i>Examples of Data Collected</i>
Occupation, title, employer, employment history, education, industry affiliations
<i>Why Do We Collect This Data?</i>
Account opening, carrying out operational and administrative functions, understanding your needs and offering products and services to you, prudently managing our business and protecting and enforcing our rights, managing our relationship with our clients and connected parties, marketing, meeting our regulatory and compliance obligations and preventing financial crime
<i>Where Do We Collect Data From?</i>
You, your authorized representatives and agents, third-party vendors that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime
<i>Who Do We Share Data With</i>
Vendors who assist with preventing financial crime, GS lawyers, auditors, accountants and others providing professional advice, regulators and law enforcement authorities, your authorized agents and representatives to whom you instruct or authorize us to disclose your data, any person or entity to whom GS is obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent

In addition to the above disclosed uses, on occasion we use your information:

- To provide the System to you, which may include sharing such information internally as well as disclosing it to third parties, as described in this Privacy Policy and other Privacy Notices that we may provide to you in connection with the System.
- To send you marketing communications that we believe may be of interest.
- To improve System performance and personalize your experience, including by presenting content, products, and services tailored to you.
- Perform analytics concerning your use of our online services, including your responses to our e-mails and

the pages and advertisements you view while using the System.

- For any other purpose that we disclose at the time you provide, or when we collect, your information.

Other situations in which sharing may occur, include:

- We may transfer personal information to a third party in the event of a merger, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other sale or transfer of any or all of our business, assets, or stock, and during negotiations for the same.
- We may aggregate your personal information in a manner that no longer reveals your specific identity. We may use and disclose aggregated information for any purpose.
- We may also use and disclose, for any purpose, information that does not reveal your specific identity or directly relate to you as an identifiable individual. If, however, we are required to treat such information as personal information under applicable law, then we may use and disclose it for the purposes for which we use and disclose personal information, as detailed in this Privacy Policy.

### **Protection of Personal Information**

We take commercially reasonable measures that comply with federal law to secure and protect information transmitted via or stored on the System. These measures include computer safeguards and secured files and buildings. Nevertheless, no security system is impenetrable. We cannot guarantee that information that users of the System may happen to transmit or otherwise supply will be totally secure.

### **Cookies and Other Tracking Technologies**

We and our service providers use tracking technologies such as cookies, web beacons, device advertising IDs and similar technologies on the Site and in our email communications. These technologies collect information about use of the Site, such as browser, device information and browsing information such as time spent on the Site, pages visited, language preferences and other traffic data. Pixels or similar technologies may also be used in our emails to determine whether you have opened our email and how you interact with it.

These technologies are used for a number of business purposes, such as to record your preferences, track your use of the Site across multiple devices, track how you interact with our communications, suggest products tailored to you, measure exposure to our online advertisements, monitor traffic, analyze use of the Site, for security purposes, to display information more effectively, to personalize a user's experience, and to improve the Site and make the Site easier to use.

You have choices to limit some tracking mechanisms that collect information when you use the Site. Many web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. If you choose to decline cookies, certain features of the Site may not function properly or may not remain accessible to you. You may prevent us from determining whether you have opened our emails via pixel technology by configuring your email client to not load images in emails. For more information about your choices, see *Interest-Based Advertising* below.

#### *Cookies*

Cookies are small text files that may be placed on your device when you visit the Site or when you view advertisements that we have placed on other websites. Cookies allow your browser to remember some specific information which the web server can later retrieve and use.

#### *Tags, Pixels, Web Beacons, Clear GIFs*

A web beacon, also known as an internet tag, pixel tag or clear GIF, is typically a one-pixel, transparent image located on a webpage or in an email. These may be used when you are served with advertisements, when you interact with

advertisements outside of our online services or when you open our emails. They are generally used to transmit information back to a web server.

#### *Interest-Based Advertising*

Interest-based advertising refers to collecting information about your online activities over time and across different websites, devices, and other online services to deliver advertisements based on online activity. We use interest-based advertising to deliver advertisements and other targeted content to you, including through third-party advertising companies which we may permit to track your visits to the Site. These third parties may use these technologies to collect information about you when you use the Site and your other online activities. They may collect information about your online activities over time and across different websites and other online services. They may also use persistent identifiers to track your internet usage across other websites and devices in their networks beyond the Site. They may use this information to provide you with interest-based advertising or other targeted content.

We, and many of the third-party advertisers that place tracking tools on the Site, are members of the Interactive Advertising Bureau's *Self-Regulatory Program for Online Behavioral Advertising*. Some of our ads that are displayed on third-party websites will feature an AdChoices icon inside the ad. Clicking on the AdChoices icon inside the ad will provide you an opportunity to opt out of interest-based advertising by the third parties that participate in the program. In addition, you can learn more about the options available to limit these third parties' collection and use of your information by visiting our [opt-out page](#) and the websites for the [Network Advertising Initiative](#) and the [Digital Advertising Alliance](#), as well as the webpages for [Facebook's ad preferences tool](#) and [privacy policy](#). Users of our mobile applications may install the Digital Advertising Alliance's AppChoices mobile app, available [here](#), and choose to opt-out of participating advertising networks' use of mobile app activity for interest-based advertising purposes. If you choose to opt-out via the web-based tools, a cookie will be placed on your browser indicating your decision. This cookie is specific to a particular device and browser, so if you use different browsers or devices, you will need to opt-out on each. In addition, because the opt-out is facilitated via cookies, if you clear your cookies you will need to opt-out again. Likewise, mobile app opt-outs via AppChoices are based on your mobile device's advertising identifier, so if you reset it, you will need to opt-out again via AppChoices.

For your convenience, Goldman Sachs may make available on the Site third-party applications such as content linking to other websites or sharing facilities. Information collected by providers of such applications is governed by their privacy policies. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any linked websites or of any companies that we do not own or control.

#### **"Do Not Track" Disclosures**

Your browser or device may include Do Not Track functionality. This Site may not respond to "Do Not Track" functionality. That means that, even if your browser is set to "Do Not Track," our information collection and disclosure practices will operate in accordance with the standards set out in this Privacy Policy.

#### **Changes to this Privacy Policy**

We may update this Privacy Policy to reflect changes to our information practices or legal requirements. The effective date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Site or otherwise provide it to you. Your use of the Site following these changes means that you accept the revised Privacy Policy.

## **Residents of California**

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

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

If you are a resident of California, you have certain rights in relation to your personal information pursuant to the CCPA. These include your right to:

- Request information about the personal information that we collect about you and the manner in which we process and disclose that information
- Obtain the specific pieces of personal information that we have collected about you in the 12 months preceding your request
- Delete certain personal information that we have collected about you
- Opt-out of disclosures of your personal information to third parties under certain circumstances
- Not be discriminated against as a result of exercising any of the aforementioned rights

If you would like to discuss or exercise such rights, please contact us at [GSAM-Privacy-Info@gs.com](mailto:GSAM-Privacy-Info@gs.com) or at 1-844-930-0648, or by calling or emailing your client relationship contact.

California law requires us to verify the requests we receive from you when you exercise certain of the rights listed above. To verify your request, we will check the information you provide us in your request (which may include your name, phone number and email address) against third party identity verification tools or verified information you have previously provided to us. As part of this process, we may call you after you submit your request to verify information. You may also designate an authorized agent to exercise certain of the rights listed above on your behalf by providing the authorized agent with power of attorney pursuant to the California Probate Code. The authorized agent may make the request on your behalf by following the instructions above. If an authorized agent submits a request on your behalf, we will contact you to verify that they represent you.

California law requires that we describe certain disclosures of personal information where we receive valuable consideration. California law treats such disclosures as "sales" even if no money is exchanged. We do not sell information to third parties as defined under California law. We do not knowingly sell the personal information of minors under 16 years of age.

## **Visiting our Websites from Outside of the United States**

If you are visiting the System from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using the System, you understand and consent that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.