

Goldman Sachs Personal Financial Management Privacy Policy

Effective Date: May 28, 2020

United Capital Financial Advisers, LLC d/b/a Goldman Sachs Personal Financial Management ("GS PFM") and its affiliates ("we", "us" or "our") respect your privacy and are committed to complying with this privacy policy ("Privacy Policy"), which describes what information we collect about you, our customers or prospective customers and clients of our partners, independent partners and licensees, including how we collect it, how we use it, with whom we may share it and what choices you have regarding our use of your information. Our partners and licensees may include registered investment advisers, independent broker dealers and other parties with whom we have a business relationship. This Privacy Policy applies to information collected through our websites that link to this policy (the "Websites") which include but are not limited to: <http://goldmanpfm.com>, <http://www.finlife.com> and <https://www.flexscore.com>, any mobile applications associated with the Websites (the "Mobile Applications") and all other online offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology or any associated content, material, or functionality contained on the Websites or Mobile Applications (the "Services" and, together with the Websites and the Mobile Applications, collectively, the "System"), as well as information collected from you offline in connection with the services we provide to you.

This Privacy Policy does not apply to information about you collected (i) by third party services, applications or websites, or advertisements associated with, linked to or otherwise accessible from the Services (including by a third party payment processor) or (ii) by third party individuals, financial institutions or financial advisors or companies with which you conduct transactions or communications facilitated through use of the Services ("Third Party Transactions"). The information collected and received by such third parties is subject to their privacy policies and under no circumstance are we liable for the third party's compliance therewith. You should review the privacy policies of third parties with whom you conduct or engage in Third Party Transactions.

This Privacy Policy is incorporated into and is a part of the terms of use of the System located here. We encourage you to become familiar with the terms and conditions of both this Privacy Policy and the Terms of Use. By accessing and using the System, or any part thereof, you agree that you have read and understand this Privacy Policy, and that, in exchange for access to the System and/or financial services offered by us, you accept and consent to the privacy practices (and any

uses and disclosures of information about you) that are described in this Privacy Policy.

Changes to our Privacy Policy

We may change this Privacy Policy at any time and from time to time in accordance with applicable law. The most recent version of the Privacy Policy is reflected by the effective date located at the top of this Privacy Policy. All such updates and amendments are effective immediately upon notice thereof, which we may give by any means, including, but not limited to, by posting a revised version of this Privacy Policy or other notice on the System. You should view this Privacy Policy often to stay informed of changes that may affect you. We expressly reserve the right to make any changes to this Privacy Policy at any time, without prior notice to you unless otherwise prohibited by applicable law. Our electronically or otherwise properly stored copies of this Privacy Policy shall each be deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy Policy.

Information We Collect

As described in detail below, we may collect certain identifying information from or about you in connection with your use of, or your submissions to, the System (collectively, the "Collected Information"). We may also collect information when you give it to us (such as when you hire us for financial advice or investment management services or contact us or subscribe to our newsletter through the system), when you give us permission to obtain it, (such as when you give us permission to access your financial resources that contain your personal information including, but not limited to, your CPA, attorney, account custodian, other advisers or websites with your information), or when we obtain it from other sources such as from the business partners or third parties that makes our services available to you or from commercially available third-party sources, such as credit reporting agencies. We may combine information we receive from commercially available third party sources with the personal and other information we have collected about you pursuant to this Privacy Policy. We also collect technical information when you use our products and services.

Collected Information includes both Personal Information and information about how you interact with our System, each as described below:

- (i) We may collect information that can be used to identify you ("Personal Information"). Personal information that we collect depends on the product

or service you have with us or access through us, and may include, without limitation: name, social security number, date of birth, contact information, account holdings and activity, financial account information, financial goals, asset and income information and biometric information.

- (ii) We also collect information regarding how you interact with the System, which information may include pages you view, links you click or hover over, selections you make on the Websites, your web browser's HTTP referrer header, features you use, preferences you set, your web browser type and version, the operating System type and version of the device you are using to access the System, the Internet protocol (IP) address of the device you are using to access the System (or any portion thereof), general physical location, Internet service provider, in addition to any other information collected as further described in this Privacy Policy.

How We Use Collected Information

We may use the information we collect for various purposes as permitted by applicable law, including, without limitation, to (i) provide the products, Services and System to you; (ii) personalize your experience; (iii) improve the System; (iv) improve our customer service; (v) process transactions; (vi) administer a contest, promotion, survey, or other System feature; (vii) send periodic emails; (viii) notify you about our products and services that may be of interest to you; (ix) improve our products and services, (x) notify you about changes to Site Policies. We may also use the information we collect as otherwise disclosed to you at the point of collection or for any other purposes with your consent.

Applicable law may require not only that we disclose the types of third parties with whom we may share personal information but also that we separately identify the categories of personal information we share with third parties for business purposes. These categories could include any or all of the following: personal identifiers; device and online identifiers and related information; demographic information; financial information; government identifiers; legally protected classification characteristics; Internet, application, and network activity; location data; audio data; and professional or employment-related information.

Due to the size and complexity of our operations, it is not possible to name each of our data recipients in this notice. However, we only share your personal data with the types of data recipients listed below.

Category: Personal Identifiers
<i>Examples of Data Collected</i>
Name, address, email address, telephone number, identifiers assigned to you for our internal use, signature, photographs
<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>
Authorized persons on your account(s); our affiliates; non-affiliated companies that perform support services for your account or process your transactions with us or our affiliates; vendors who assist with preventing financial crime; our 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 we are obliged by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Demographic Information
<i>Examples of Data Collected</i>
Date of birth, gender, estimated retirement age, marital status, number of financial dependents, family information, vital records information



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<i>Why Do We Collect This Data?</i>
Account opening; providing services to you tailored to your specific goals and circumstances; 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>
Authorized persons on your account(s); vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any with any third party where we have obtained your prior consent
Category: Financial Information
<i>Examples of Data Collected</i>
Account number(s) and other information regarding accounts with us and 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, source of wealth information, expected activity within your account, investor qualifications, investment goals and experience, net worth and liquidity needs, income, credit scores, litigation and bankruptcy history, tax classification and information, internal assessments about your financial biases, Powers of Attorney, wills and other estate planning documents, attorney/CPA information, life insurance information 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; 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; proprietary tools that we use to assess your financial goals; your service providers (including external banks and custodians); third parties that provide information to assist with marketing and meeting our regulatory and compliance obligations and preventing financial crime; consumer reporting agencies
<i>Who Do We Share Data With?</i>
Authorized persons on your account(s); our affiliates; non-affiliated companies that perform support services for your account or process your transactions with us or our affiliates; vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Government Identifiers
<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>
Authorized persons on your account(s); our affiliates; vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Legally Protected Classification Characteristics
<i>Examples of Data Collected</i>
Age, national origin, citizenship, 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; 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 parties 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>
Authorized persons on your account(s); vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any other party where we have first obtained your prior consent

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Category: Internet, Application, and Network Activity
Examples of Data Collected
Emails, data related to user activity when accessing our website(s)
Why Do We Collect This Data?
Communicating with you; providing our services and operations; helping us improve our products and webpage performance; meeting our regulatory and compliance obligations and preventing financial crime
Where Do We Collect Data From?
Your device
Who Do We Share Data With?
Authorized persons on your account(s); vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any other party where we have first obtained your prior consent
Category: Location Data
Examples of Data Collected
IP address from which you connect to our internal system(s)
Why Do We Collect This Data?
Helping us improve our products, services and operations; meeting our regulatory and compliance obligations and preventing financial crime
Where Do We Collect Data From?
Your device
Who Do We Share Data With?
Vendors who assist with preventing financial crime; our employees and agents who assist with preventing financial crime; regulators and law enforcement authorities; any person or entity to whom United Capital is obliged by applicable law to disclose your data
Category: Professional or Employment-Related Information
Examples of Data Collected
Occupation, title, employer information, employment history, industry affiliations
Why Do We Collect This Data?
Account opening; carrying out operational and administrative functions; understanding your needs and offering products and services to you; 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
Where Do We Collect Data From?
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
Who Do We Share Data With?
Authorized persons on your account(s); vendors who assist with preventing financial crime; our 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 we are obligated by applicable law to disclose your data and any other party where we have first obtained your prior consent

Cookies and Usage Reports

We may use technologies such as cookies, beacons, tags and scripts on our System. By placing a small file known as a "cookie" on your computer (or other device), we and our partners, affiliates or third party providers may passively gather information about your use of the System for several reasons, including, but not limited to, the following: statistics collection and analysis, System optimization, analytics (as described below), market research, and maintenance of user login information. For example, cookies on the Websites may track "macro" information, such as the number of independent visits made to the Websites each day, or "micro" information, such as individual users' IP addresses, downloads, and related traffic history (some of this information may be collected by web beacons, see below). The information that we and our third party service providers track with cookies may include, but is not necessarily limited to, the type of browser (such as Google Chrome, Microsoft Edge or Internet Explorer) and Internet-connected device being used to access the System, your Internet protocol ("IP") address, your home domain or Internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to visiting the System), how you were directed to the System, which specific pages you access on the System, how long you view each page, the time and date you access our System and the total number of visitors to the System

and any portions thereof. We may also use your IP address to determine the general physical location of your computer or device and understand from what geographic locations our System visitors come and to tailor our services to meet our visitors' needs (e.g., if a visitor is from California, we may use geolocation information to ensure our California team responds to such visitor).

Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the System (or some portion thereof) and its capabilities, or cause some features of the System to function improperly or more slowly.

The Websites use certain web analytics services provided by third parties in order to better understand your use of our Websites (or other portions of the System) and how we can improve the System. Such analytics providers may collect information such as how often users visit the System, what pages they visit when they do so, and what other websites they used prior to coming to the System. Such third party analytics providers may utilize the data collected to track and examine use of the System, to prepare reports on its activities and share them with us.

As part of our suite of analytics, we also utilize web analysis services provided by Google. Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Some of the areas of the System may also contain electronic images known as web beacons (sometimes known as clear gifs) that allow us, and our third party providers or affiliates, to count and track users who have visited certain portions of the System and other similar traffic history. Web beacons collect only limited information, including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides.

How We Share Collected Information

We may share Collected Information with your consent. We may also share your information with any of our affiliates or subsidiaries as permitted by law, including for business purposes such as providing the System to you, processing your transaction, managing your account(s), offering our products and services to you, obtaining information about your transactions and experience or for any other purpose described in this Privacy Policy or the Terms of Use, or any other lawful purposes. We also work with a number of non-affiliated

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companies that help service your account or assist us with providing the Services to you. We may share pertinent information about you with these companies as permitted by applicable law. All such sharing of information with third parties will be subject to obligations of confidentiality between us and the third party.

We may also disclose Collected Information if we become subject to a subpoena or court order, to report to credit bureaus, or if we are otherwise legally required to disclose information. We may use and disclose Collected Information to establish or exercise our legal rights, to enforce the Terms of Use, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

For more information about how personal information may be shared, and your options for limiting such sharing, please see our GLBA Consumer Privacy Notice.

We do not sell, rent, or lease our user lists or the identity of individual users to third parties without your consent. However, we may use and disclose certain aggregated, deidentified information to our affiliates, subsidiaries, business partners, third-party service providers or other recipients, as permitted by law for certain purposes including, without limitation, advertising, informational, comparison, research, general service or product improvement. Such information may also be shared with our customers, including the company through which our service is made available to you. However, such information shall not be personally identifiable to any user. Information stored in our GuideCenter Vault will not be included in any such aggregated and de-identified datasets.

Change in Control and Other Organizational Changes

As we grow and develop our business, it is possible that its corporate structure or organization might change or that it might merge or otherwise combine with, or that our business or portions of our business might be acquired by, another company. If we experience a Change In Control (as defined below), then we may amend our privacy and information usage practices described in this Privacy Policy. Additionally, you should expect that Collected Information (including your Personal Information) would be one of the assets that will be transferred to the legal entity that succeeds our operation and ownership of the System.

The privacy practices of the succeeding legal entity will then govern the Collected Information so transferred. However, if applicable law prohibits the succeeding legal entity's privacy policy from governing your Personal Information, then this Privacy Policy shall continue to govern. For purposes of this Privacy Policy, "Change In Control" means any of the following events: (i) a reorganization, merger, consolidation, acquisition or other restructuring involving all or substantially all of our voting securities and/or assets, by operation of law or otherwise; (ii) a general assignment for the benefit of creditors; (iii) appointment of a receiver for our business or assets; or (iv) our sale or liquidation, voluntarily or otherwise.

Information We Collect for Sweepstakes, Promotions, Contests & Surveys

On the System, you may wish to participate in online polls, surveys, contests, sweepstakes and other promotions that we may offer from time to time.

Participation in these polls, surveys, contests, sweepstakes and promotions is completely voluntary; you have a choice about whether or not to disclose information required to enter. Information requested may include personal contact information such as your name, address, date of birth, phone number, mobile phone number, e-mail address, username, and/or similar information. In addition, as noted above, we may share this information with our affiliates, and other organizations or entities. In connection with any online polls, surveys, contests, sweepstakes and other promotions that we may offer from time to time via the System, we use the information you provide to administer the polls, surveys, contests, sweepstakes and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our services or our marketing partners may use such information to communicate with you about the online polls, surveys, contests, sweepstakes or other promotions or their products and services.

How We Protect Collected 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. You agree to immediately notify us of any breach of System's security, this Privacy Policy, or the Terms of Use of which you become aware.

Linked Websites

For your convenience, some hyperlinks may be posted on the System that link to other websites (the "Linked Websites"). Some Linked Websites are not under our control, such as facebook.com, twitter.com, and linkedin.com. 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. Linked Websites may collect additional information to that which we collect on the System. Except for Linked Websites owned or operated by us, we cannot be responsible for the privacy practices of any such Linked Websites, nor do we endorse any of these Linked Websites, the services or products described or offered on such Linked Websites, or any of the content contained on the Linked Websites. We encourage you to seek out and read the privacy policy of each website that you visit. In addition, should you happen to initiate a transaction on a Linked Website, even if you reached that Linked Website through the System, the information that you submit to complete that transaction becomes subject to the privacy practices of the operator of the applicable Linked Website. You should read each Linked Website's privacy policies to understand how Personal Information that is collected about you is used and protected.

California and Delaware "Do Not Track" Disclosures

California and Delaware law require that we indicate whether we honor "Do Not Track" settings in your browser concerning targeted advertising. "Do Not Track" is a standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

California Consumer Privacy Act

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

- (1) 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
- (2) Other information subject to an exception under the California Consumer Privacy Act (CCPA).

If you are a resident of California, you have certain rights in relation to your personal information pursuant to the California Consumer Privacy Act (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 1-855-227-8581 or at <https://www.goldmanpfm.com/ccpa-data-request>.

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, email address, physical address and date of birth) against third party identity verification tools or verified information you have 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 or by executing other documentation we may require. 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.

Children

The System is not intended for use or view by children under 13 years of age. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian to assist you in using the System. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 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.

Unsubscribe/ Contact Us

We want to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your personal information or preferences, please follow the instructions below. However, we may send you service-related announcements, announcements about changes in policies, and transactional e-mail such as confirmations and receipts, from time to time through the general operation of the System or by e-mail. If you do not want to receive any e-mail from us in the future, click the "unsubscribe" reference in any e-mail we send you.

If you wish to review the contact information we have on file for you, correct your contact information, provide a change of address, or inform us how you wish your contact information to be used, or if you have any questions, comments or suggestions about the System or our Services, please contact us by telephone or mail, as follows:

1(800) 796-3315
620 Newport Center Drive Suite 500
Newport Beach, CA 92660

If you correspond with us through the System or via email, the Collected Information may include the content of, and metadata regarding, any correspondence you may have with us. We may share your messages with those within our organization who are most capable of addressing the issues contained in your message. We will keep a copy of your message until we have had an opportunity to address your concerns.

Acknowledgement

BY ACCESSING OR USING THE SYSTEM, OR ANY PORTION THEREOF, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND CONSENT TO THE PRIVACY POLICY, AND TO THE USES AND DISCLOSURES OF COLLECTED INFORMATION ABOUT YOU, THAT ARE DESCRIBED IN THIS PRIVACY POLICY AND YOU AGREE TO BE BOUND BY THE TERMS OF USE REFERENCED ABOVE.