

GOLDMAN SACHS ASSET MANAGEMENT L. P.
PRIVACY POLICY

Effective January 1, 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. (“Goldman Sachs”, “GS”, or “we”) with respect to the collection, use, disclosure and safeguarding of your personal information.

Our Collection, Use, and Disclosures Practices

In the table below, we have identified, by category, the various types of personal information that we collect about you and we have provided examples for illustrative purposes. We collect and use your personal data as explained in the table below and we have listed the types of third parties with whom we may share it from time to time. Although most of the personal information we hold is obtained directly from you, we have indicated below the other sources of such information.

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 Goldman Sachs’ operations, it is not possible to name each of our data recipients in this policy. However, Goldman Sachs only shares 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, 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 perform support services for your account or process 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

Category: Device and Online Identifiers and Related Information
<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, 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 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
Category: Demographic Information
<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 perform support services for your account or process 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
Category: Financial Information
<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 perform support services for your account or process 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
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>
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
Category: Legally Protected Classification Characteristics
<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
Category: Internet, Application, and Network Activity
<i>Examples of Data Collected</i>
Emails, in relation to our website only, data related to user activity, e.g. browser visits
<i>Why Do We Collect This Data?</i>
Communicating with you, 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>
You, your authorized representatives and agents, your device(s), 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 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

Category: Location Data
<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
Category: Audio Data
<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
Category: Professional or Employment-Related Information
<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, we may use data that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable laws and regulations.

Protection of Personal Information

Firm policy mandates that confidential information, including your personal information, be safeguarded from misuse, misappropriation and improper dissemination. Goldman Sachs maintains policies and procedures designed to protect client information in accordance with this Firm mandate, including training our employees, physically locating our employees to minimize potential breaches of confidentiality, and applying technology controls as required by applicable law. More specifically, confidential information is made available only to persons who have a need to know such information in connection with the duties they carry out or the services they perform. System access entitlements are designed to minimize exposure to confidential information, and reasonable and appropriate security measures are used to protect such systems against potential external threats. Procedures for escalating and remediating incidents involving actual or suspected security incidents are also an essential part of our security program. Finally, the use of personal information by affiliates and service providers is carried out in accordance with applicable state and federal privacy laws.

The Internet

The following additional information will be of interest to you as a user of any of the following GSAM websites: gsam.com, gsamfunds.com, GoldmanSachsBDC.com, GSAcquisition.com, and Aptitudeinvest.com (individually and collectively “the Site”):

Users of the Site are required to identify and authenticate themselves prior to accessing our services. Generally, identification and authentication take place through the use of your user name and a password. The Site is built upon a secure infrastructure with multiple layers of protection, including measures ranging from proper physical security of our machines to system intrusion detection capabilities. Within the Site, Goldman Sachs uses industry standard encryption technologies to protect your information from external compromise.

Security is a cooperative effort between Goldman Sachs and the users of the Site. Please remember that your password is personal to you and should not be made available to any other person. Also, you should discontinue their use and notify us if you have any reason to suspect that someone else may be using them.

“Cookies” are small text files that may be placed on your Web browser when you visit the Site or when you view advertisements we have placed on other Web sites. For more information about cookies, how our web sites use them, and your options with respect to their use, please see our cookies policy.

“Clickstream” data (e.g., information regarding which of our Web pages you access, the frequency of such access, and your product and service preferences) may be collected by Goldman Sachs itself, or by our service providers, using cookies, Web beacons, page tags, or similar tools that are set when you visit the Site or when you view advertisements we have placed on another Web site. Clickstream data and similar information may be shared internally within Goldman Sachs and used: for administrative purposes; to assess the usage, value and performance of our online products and services; to improve your experience with the Site; and as otherwise permitted by applicable law or regulation. This information helps us suggest products or service offerings that may be of interest to you. This information may be processed by us for the purposes described above, or on our behalf by third parties, solely in accordance with our instructions.

Goldman Sachs may make available on the Site third party applications such as content linking or sharing facilities. Information collected by providers of such applications is governed by their privacy policies.

The Site is not currently configured to respond to “do not track” signals or similar mechanisms.

Changes to this 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: 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 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 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 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. 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 sell the personal information of minors under 16 years of age without affirmative authorization.