

高盛中国隐私政策

生效日期：2024 年 4 月 24 日

《高盛中国隐私政策》（以下简称“**本项政策**”）是高盛集团在中国境内的子公司及关联公司（在本项政策中分别或合称“**我们**”或“**本公司**”，各境内公司的具体名称请见本项政策“[附录 2：高盛中国境内公司列表](#)”）在《中华人民共和国个人信息保护法》（“**《个人信息保护法》**”）适用的范围内处理和保护您的个人信息的告知和一般性声明。

本项政策适用于我们为您提供产品或服务或/与我们与您建立/开展其他业务合作的情形，包括我们与高盛集团境外公司协同为您提供产品或服务或/与您建立/开展其他业务合作。对于我们提供的特定产品或服务或/与我们与您建立/开展的其他特定业务合作，我们可能还会向您提供本项政策以外的特定的隐私政策或其他声明（以下简称“**补充政策**”），如**补充政策**（如有）与本项政策有不一致之处，优先适用**补充政策**的规定。

我们非常重视您的个人信息保护，因此制定了本项政策，并按照本项政策收集、使用、共享、存储或以其他方式处理（合称“**处理**”）并保护您的个人信息。在开始使用我们的产品或服务或/与我们建立/开展其他业务合作前，请您务必仔细阅读并了解本项政策，**特别是以粗体标识的条款**，并决定是否同意我们据此处理您的个人信息。请您注意，如果处理特定个人信息是为您提供某些产品或服务或/与您建立/开展某些其他业务合作所必需的，但您拒绝我们处理您的该等个人信息或您拒绝向我们提供该等个人信息，则可能会影响您使用我们的某些产品或服务或/与我们建立/开展某些其他业务合作。此外，在法律允许的情况下，我们可以不基于您的同意而依据本项政策收集、使用或以其他方式处理您的个人信息。在法律要求的情况下，我们会就处理您的个人信息的特定情形征求您的单独同意。

我们深知个人信息对您的重要性，并会尽全力保护您的个人信息安全。我们致力于维持您对我们的信任，在个人信息处理活动中恪守《个人信息保护法》确立的以下原则：合法、正当、必要和诚信原则、目的明确原则、公开透明原则、质量保证原则、安全保障原则等。同时，我们承诺按照业界成熟的安全标准，采取适当的安全保护措施来保护您的个人信息。

本项政策主要包括如下内容：

- 一、 [个人信息的收集和使用](#)
- 二、 [个人信息的委托处理、共享、转让、公开披露](#)
- 三、 [个人信息的出境](#)
- 四、 [个人信息的存储](#)

- 五、 [个人信息的安全保障](#)
- 六、 [您对个人信息的权利与选择](#)
- 七、 [未成年人的个人信息保护](#)
- 八、 [隐私政策的更新](#)
- 九、 [联系我们](#)

[附录 1：相关定义](#)

[附录 2：高盛中国境内公司列表](#)

一、 个人信息的收集和使用

为了向您提供我们的产品或服务或/或我们与您建立/开展其他业务合作，我们可能需要收集、使用您的个人信息，包括您在与本公司的沟通、接触、合作过程中主动提供的个人信息，或因使用我们的产品或服务或/或与我们建立/开展其他业务合作而产生的个人信息。在此过程中，如果您向我们提供他人的个人信息，请您确保他人对该等情况充分知情并予以同意（或满足其他合法性基础），且您的该等行为不侵犯任何人的合法权益。

我们主要在以下场景中收集、使用您的个人信息。现就各个场景涉及的处理目的、处理方式、个人信息类型（请您特别注意其中加粗显示的敏感个人信息，该等信息可能对您具有更重大的影响）说明如下，有关个人信息收集、使用的更具体的说明，请同时参阅本公司在向您提供产品或服务或/或与您建立/开展其他业务合作时提供的申请表格、产品介绍、服务说明等材料（如有）。在大部分场景下，我们处理您的个人信息是为订立、履行您与我们之间的合同所必需，或是为履行我们的法定义务所必需；在少数场景下，我们需要基于您的同意而处理您的个人信息，我们将在该等场景下予以说明并征求您的同意。

（一） 投资者账户开设与维护

我们收集的您的个人信息主要来自您所填写的投资者账户申请，以及您在和本公司建立/开展业务关系过程中向我们提交的其他表格和材料。我们还可能就本公司提供的产品和服务收集您涉及该等产品或服务的交易信息和相关经历。

您有权自行决定是否向我们提供包含您（和/或他人）个人信息的资料。但请您知悉，为了使用本公司的产品或服务，您需要向我们提供开设、维护投资者账户所必需的个人信息，否则我们无法为您开设账户并提供相应的产品或服务。

1. 如果您以个人身份寻求本公司的产品或服务（您作为个人客户进行投资），我们可能收集、使用您的下列个人信息（视您的具体身份适用）：
 - 您的姓名、性别、年龄、出生日期、国籍、地址、常住国家、联系方式（如手机号码、电子邮箱地址、固定电话号码）；

- 您的学历、工作经历、职业/职务、员工证、婚姻状况、不良诚信记录（如适用）、资产情况及相关证明、投资经验及相关证明；
 - 您的有效身份证件的类型、号码、有效期限；
 - 为进行尽职调查或根据法律法规要求，从您护照、身份证或驾驶证中采集的免冠照片（如适用）；
 - 根据自律监管机构业务指南等相关要求，就您以现场或远程方式在本公司开设账户相关过程进行的录像（如适用）等。
2. 如果您是本公司的公司客户或机构客户的控股股东、实际控制人或某一交易事项的实际受益人、法定代表人/执行事务合伙人（或其委派代表）、授权代表人、雇员，在本公司和您所属/相关的公司或机构建立业务关系、进行业务合作的过程中，我们可能收集、使用您的下列个人信息（视您的具体身份适用）：
- 您的姓名、联系方式（如手机号码、电子邮箱地址）；
 - 您的所属/相关的公司或机构、职位；
 - 您的有效身份证件的类型、号码、有效期限；
 - 根据反洗钱等法律法规要求，您所提供的有效身份证件的彩色复印件或照片等。

在您与本公司的业务合作过程中，由您所提供的他人的个人信息，包括但不限于您所属/相关的公司、机构或关联方的上述人员的个人信息，以及您及您所属/相关的公司、机构或关联方在业务经营过程中取得和使用的信息（其中可能包括他人的个人信息），请您确保他人对该等情况充分知情并予以同意（或满足其他合法性基础），且您的该等行为不侵犯任何人的合法权益。

为确保我们所掌握的个人信息准确、完整，如果您向我们提供的个人信息发生任何变更，请您及时通知我们，这将对我们的工作提供极大的帮助。

（二） 业务运营相关的其他情形

1. 本公司在开展投资银行类业务时，需根据法律法规要求开展项目尽职调查工作。如果您是本公司的公司客户或机构客户（包括但不限于项目发行主体）的发起人、主要股东、实际控制人、董事、高级管理人员、雇员，和/或代表项目发行主体的主要客户、主要供应商参与尽职调查的访谈对象，在本公司进行项目尽职调查的过程中，我们可能收集、使用您的下列个人信息（视您的具体身份适用）：
- 您的姓名、国籍、联系方式（如手机号码、电子邮箱地址）、尽调地点；
 - 您的个人简历（含工作经历、教育背景等）、照片、目前所属公司、职位；
 - 您的有效身份证件的类型、号码、有效期限和/或有效身份证件的复印件或照片；
 - 您及您的亲属在项目发行主体中的直接/间接持股、任职的相关情况等。

在您与本公司的业务合作过程中，由您所提供的他人的个人信息，包括但不限于您所/相关的公司、机构或关联方的上述人员的个人信息，以及您及您所/相关的公司、机构或关联方在业务经营过程中取得和使用的信息（其中可能包括他人的个人信息），请您确保他人对该等情况充分知情并予以同意（或满足其他合法性基础），且您的该等行为不侵犯任何人的合法权益。

2. 本公司在开展资产管理类业务时，需根据法律法规要求开展项目尽职调查及合规审查等工作。如果您是本公司资产管理类业务的交易相对方，在本公司建立业务关系、进行客户身份识别和尽职调查、交易以及投后管理或开展特定的项目阶段的过程中，我们可能收集、使用您（视您的具体身份适用）的个人信息，具体而言：

- **建立业务关系阶段**

为了与您建立以及管理业务关系，我们将可能收集、使用您的姓名、地址、电话号码、电子邮箱地址、目前所属公司、职位等信息。如您不提供前述个人信息，我们可能无法与您取得联系，进而影响业务开展。

- **客户身份识别和尽职调查阶段**

为了遵守客户身份识别和尽职调查等适用法律法规的要求，我们将可能收集、使用您的姓名、性别、国籍、出生日期、电话号码、电子邮箱地址、交易信息、银行账户信息（银行账号、银行名称）、银行卡正反面复印件、教育经历、工作经历、职业、职务、护照号码及护照复印件、身份证号码及身份证复印件、财务状况及相关证明（收入来源、数额、资产、债务等）、税收居民身份、贷款资料、投资经验及相关证明、投资目标（投资期限、品种、期望收益等）、风险偏好及可承受的损失、诚信记录等法律法规规定及/或相关内部政策要求的相关信息。如您不提供前述个人信息，我们将无法完成相应的客户身份识别和尽职调查等适用法律法规规定的义务和/或相关内部政策的要求，进而会影响有关项目阶段的进度。

- **交易阶段**

为了考虑、评估、建议、推进或者完成有关交易，签署有关的交易文件，进行支付（包括进行交易预订、验证支付细节、支付处理和收款流程）以及电话回访等目的，我们将可能收集和使用您的姓名、电话号码、电子邮箱地址、交易信息（交易金额、交易份额、交易时间、产品/服务名称、付款方式等）、银行账户信息（银行账号、银行名称）、银行卡正反面复印件、教育经历、工作经历（包括目前所属公司、职业、职务/职位等）、护照号码及护照复印件、身份证号码及身份证复印件、财务状况（收入来源、数额、资产、债务等）、税收居民身份、贷款资料、投资经验、投资目标（投资期限、品种、期望收益等）、风险偏好及可承受的损失、诚信记录、基金代扣代缴个人所得税金额等相关信息。如您不提供前述个人信息，我们将无法完成前述交易相关目的，进而会影响有关项目阶段的进度。

- **投后管理阶段**

为了履行适当性管理义务，我们将可能收集和使用您的姓名、电话号码、电子邮箱地址、银行账户信息（银行账号、银行名称）、银行卡正反面复印件、教育经历、工作经历（包括目前所属公司、职业、职务/职位等）、护照号码及护照复印件、身份证号码及身份证复印件、财务状况（收入来源、数额、资产、债务等）、税收居民身份、贷款资料、投资经验、投资目标（投资期限、品种、期望收益等）、风险偏好及可承受的损失、诚信记录等相关信息以及其他适用法律法规或相关内部政策要求我们收集的信息。如您不提供前述的个人信息，我们将无法完成投后管理义务。

我们在投后管理阶段还可能会收集和使用您的姓名、身份证号、银行账户信息（银行账号、银行名称）（如您授权我们为您办理退税）、基金代扣代缴个人所得税金额、交易信息（交易金额、交易份额、交易时间、产品/服务名称、付款方式等）、电话号码、电子邮箱地址、银行卡正反面复印件、教育经历、工作经历（包括目前所属公司、职业、职务/职位等）、护照号码及护照复印件、身份证号码及身份证复印件、财务状况（收入来源、数额、资产、债务等）、税收居民身份、贷款资料、投资经验、投资目标（投资期限、品种、期望收益等）、风险偏好及可承受的损失、诚信记录。如您不提供前述个人信息，我们将无法开展有关的项目流程，如开展有关的交割后活动（包括但不限于执行退出战略）。

我们也会将收集的个人信息用于我们的内部记录、合规以及其他相类流程，以及完成相关政府流程和程序、遵守有关的法律要求。

此外，在特定的项目阶段，我们也可能会向您出具单独的与个人信息处理有关的文件，进而向您披露更多的个人信息处理细节或收集更多关于您的个人信息。

在您与本公司的业务合作过程中，由您所提供的他人的个人信息，包括但不限于您所属/相关的公司、机构或关联方的上述人员的个人信息，以及您及您所属/相关的公司、机构或关联方在业务经营过程中取得和使用的信息（其中可能包括他人的个人信息），请您确保他人对该等情况充分知情并予以同意（或满足其他合法性基础），且您的该等行为不侵犯任何人的合法权益。

3. 本公司在开展证券投资咨询业务时，将根据业务运营的需要与行业专家开展业务合作，包括但不限于聘请行业专家协助审阅或优化本公司的研究报告，组织或邀请行业专家参加相关行业研讨会、专题讨论活动等。如果您是**与本公司建立/开展业务合作关系的行业专家**，为订立、履行您与我们之间的合同或者如果您同意，我们在合作过程中可能收集、使用您的姓名、联系方式、所属公司、职位、专业领域、银行账户信息（为费用支付之目的）等。
4. 为了顺畅地向您提供产品或服务**和/或与您开展其他业务合作**，与您进行必要的联系与沟通，我们可能收集、使用您的姓名、邮寄地址、电话号码、电子邮箱、传真信息等，以便与您以及您指定的代表（如适用）进行联系。
5. 为了持续优化本公司提供的产品、服务或业务，或为了向您推荐本公司的其他产品、服务或业务合作机会，如果您同意，我们可能收集、使用您的电话号码、电

子邮箱，向您发送相关的市场营销信息、客户调研问卷等内容，您可以联系您的销售代表要求退订，或者通过上述信息与问卷中提示的退订方式操作。

（三） 合规管理

1. 根据反洗钱和防止欺诈等法律法规要求和监管要求，我们需要执行严格的 KYC（即“充分了解你的客户”）政策。

如果您以个人身份寻求本公司的产品或服务（您作为个人客户进行投资），我们可能收集、使用您的下列个人信息（视您的具体身份适用）：

- 您的姓名、联系方式（如手机号码、电子邮箱地址、固定电话号码）；
- 您的有效身份证件复印件；
- 您的被授权人的姓名及其有效身份证件复印件（如适用）；
- 您的职业背景（如适用）；
- 您的财产/资金来源情况（如适用）等。

如果您是本公司的公司客户或机构客户的股东（通常仅适用于达到特定持股比例的股东）、实际控制人、受益人、法定代表人/执行事务合伙人（或其委派代表）、董事、主要负责人员、被授权人，在本公司和您所属/相关的公司或机构建立业务关系、进行业务合作的过程中，我们可能收集、使用您的下列个人信息（视您的具体身份适用）：

- 您的姓名、地址、居住国家；
- 您的有效身份证件的类型、号码、有效期限和/或有效身份证件的复印件；
- 您的财产/资金来源情况、职业背景、反洗钱情况说明等。

2. 根据法律法规要求，本公司在向您提供相关金融产品和/或服务时，应履行风险承受能力评估等投资者适当性管理义务，充分了解您在投资相关金融产品和/或获得相关金融服务时可承受的风险程度等情况，使本公司所提供的相关产品和/或服务与您的风险承受能力等级相匹配。基于此，我们可能收集、使用您的下列个人信息：

- 您的姓名、年龄、联系方式；
- 您的学历、就业状况；
- 您的财务状况、投资经验和目标、风险偏好等情况，以及资产证明、投资经历、诚信记录、金融从业经历等证明材料；
- 您就财产/资金来源状况作出的保证（如适用）等。

（四） 税务管理

根据共同申报准则（CRS）及法律法规要求，本公司需要收集并向相关税务机关报送账户持有人的税收居民身份信息。

如果您是本公司的个人账户持有人，在本公司和您建立业务关系、进行业务合作的过程中，我们可能收集、使用您的下列个人信息：

- 您的姓名、联系方式；
- 您的国籍、居住地、出生地、出生日期；
- **银行账户信息（银行账号、银行名称）、银行卡正反面复印件；**
- 您的税收居民国（地区）、税收居民身份、纳税人识别号类型及识别号、基金代扣代缴个人所得税金额等。

如果您是本公司的公司或机构账户持有人的控制人，在特定情形下，在本公司和您相关的公司或机构建立业务关系、进行业务合作的过程中，我们可能收集、使用您的下列个人信息：

- 您的姓名、出生地、居住地、出生日期；
- 您的税收居民国（地区）、纳税人识别号等。

（五） 供应商管理

如果您是本公司的供应商及其相关人员（如联系人），为了顺畅地接受由您提供产品或服务或/或与您开展其他业务合作，与您进行必要的联系与沟通，我们可能收集、使用您的姓名、联系电话、电子邮箱地址。

（六） Cookie 和同类技术的使用

Cookie 是互联网中普遍使用的技术。如果您通过一个或多个本公司的网址获取本公司的产品或服务，为优化您的访问体验（例如，“记住”您的身份，从而使您在切换网页过程中无须重复输入密码）及保障您的访问安全性（例如，验证您的身份真实性，避免恶意攻击者篡改您的通信内容），我们可能会在您的设备上存储一个或多个名为 Cookie 的小型文本文件。您可以更改网络浏览器设置，以便当 Cookie 被设置时或被阻止设置时能够得到通知。但是，**如果您拒绝使用 Cookie，则网站所能够提供的功能可能会减少；如果您拒绝使用与验证相关的 Cookie，则您可能无法正常使用我们的网站。**

此外，我们可能会收集 Clickstream 或类似的信息（例如，您访问本公司网站的哪些页面以及访问的频率等信息），从而评估本公司网站的访问量以及您可能感兴趣的产品或服务。

（七） 无需您同意的情形/其他合法性基础

请您注意，根据法律法规的规定，在以下情形中，我们无需取得您的同意即可收集、使用或以其他方式处理您的个人信息：

- 为订立、履行个人作为一方当事人的合同所必需，或者按照依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需；
- 为履行法定职责或者法定义务所必需；

- 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
- 依法在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；
- 法律、行政法规规定的其他情形。

请您注意，匿名化处理后的信息不再属于个人信息，因此不受本项政策的约束和保护。

二、个人信息的委托处理、共享、转让、公开披露

我们高度重视您的个人信息保护，仅在取得您的同意或法律法规允许的情况下，才会委托处理、共享、转让、公开披露您的个人信息。

（一）委托处理

在我们为您提供产品或服务或/与您建立/开展其他业务合作的过程中，可能委托第三方供应商提供某些特定的业务功能。该等第三方会在既定的范围和期限内协助我们处理您的个人信息，并在完成任务后及时删除您的个人信息。

- 我们可能聘请服务提供商提供公民身份信息核查比对服务，以协助我们进行客户管理和客户身份识别。
- 我们可能聘请提供法律顾问服务、审计服务等专业服务的机构为您和本公司的某些业务合作提供支持，如开展尽职调查。

对我们委托处理个人信息的第三方供应商，我们会依法与其签署相应的协议、对其处理活动进行监督，要求他们按照法律法规、我们的要求及本项政策采取适当的安全保护措施，保障您的个人信息安全。

（二）共享

为了更好地为您提供产品或服务或/与您建立/开展其他业务合作，我们可能会与关联公司、第三方合作伙伴进行业务合作，并在实现业务合作的必要合理范围内共享您的个人信息。

我们会依法评估需要共享个人信息的情形，并采取适当的保护措施，以保障您的个人信息安全。如果该等共享涉及向境外提供个人信息，请同时参考本项政策“三、个人信息的出境”。

1. 与关联公司共享

在实现全球化服务客户、统一经营管理之目的的必要合理范围内，我们在业务运营过程中可能与特定的关联公司共享个人信息（并由其合伙人、执行董事、高管、董事、雇员在各自的职责与权限范围内访问、使用或处理相应的个人信息），以更好地推进有关项目阶段或者为您提供有关的服务，中国境内的关联公司详见本项政策“附录 2：高盛中国境内公司列表”。

- 为了充分利用高盛集团的全球市场覆盖和产品经验，为中国境内客户提供跨地区、一体化、全方位的服务，我们可能和特定的关联公司共享您的个人信息，以便该等关联公司为您提供境内外资产配置、交易策略、融资并购等方面的产品、服务或业务合作。
- 为了高盛集团的统一经营管理，我们可能与特定的关联公司共享与本公司的业务经营相关的统计数据、人力资源管理等相关信息，其中可能涉及您的个人信息。

2. 与第三方合作伙伴共享

在我们为您提供产品或服务或/与您建立/开展其他业务合作的过程中，某些特定的业务功能可能由第三方供应商提供和/或涉及与第三方进行合作。为实现前述目的，我们需要在必要合理范围内共享您的个人信息。

- 本公司在开展金融产品/基金销售业务时，根据本公司与产品/基金管理人的合作协议约定，在不违反任何合同义务、法律义务等义务的情况下，本公司可能向产品/基金管理人提供相关产品/基金的投资者或潜在投资者的个人信息，如姓名、有效身份证件信息、投资经历、财产/资金来源状况等，以供产品/基金管理人为依法执行 KYC 政策、履行投资者适当性管理义务等目的使用。
- 本公司会向潜在融资来源或联合投资方（包括服务提供商、顾问或此类潜在联合投资方和融资来源的代表）分享您的个人信息，以获得融资或推进交易。

3. 向相关的执法机构、监管机构、政府、法院等第三方进行披露

向相关的执法机构、监管机构、政府、法院等第三方进行披露，仅限于我们认为合法且必要的场景与范围，主要包括：（1）根据适用于高盛的（包括但不限于中国的）法律法规或监管要求进行披露；（2）在适用法律法规授权或允许的范围内，为行使、建立或者抗辩我们的合法权利而进行披露；或（3）在您或他人的人身或财产安全可能受到威胁的紧急情况下进行披露。

如果涉及向外国执法、司法机构进行披露，尤其在执法案件或司法案件的调查取证中，我们会严格遵守中国适用法律法规项下对于该等披露的要求。

（三）转让

我们原则上不会将您的个人信息转让给任何公司、组织和个人。如果我们因合并、分立、解散、被宣告破产等原因需要转移您的个人信息，我们会向您告知接收方的名称或者姓名和联系方式，并要求接收方继续受本项政策的约束。接收方如果变更原先的处理目的、处理方式，将依法重新征求您的同意，除非法律法规另有规定。

（四）公开披露

我们一般不会公开披露您的个人信息，除非取得您的单独同意或法律法规另有规定。

（五）无需您同意的情形/其他合法性基础

请您注意，根据法律法规的规定，在以下情形中，我们无需取得您的同意即可共享、转让、公开披露您的个人信息：

- 为订立、履行个人作为一方当事人的合同所必需，或者按照依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需；
- 为履行法定职责或者法定义务所必需；
- 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
- 依法在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；
- 法律、行政法规规定的其他情形。

请您注意，匿名化处理后的信息不再属于个人信息，因此不受本项政策的约束和保护。

三、个人信息的出境

高盛集团是一家全球运营的跨国集团公司。为了向您提供跨地区、一体化、全方位的服务，以及集团统一经营管理等目的，我们可能在合理必要的范围内向高盛集团位于美国的总部——高盛集团有限公司（**The Goldman Sachs Group, Inc.**，简称“高盛总部”）跨境传输您的个人信息，或允许其从境外访问您的个人信息（合称“出境”）。本章节介绍了个人信息出境可能涉及的情形，在您使用我们的产品或服务或/或与我们建立/开展其他业务合作的具体场景中，我们会在不超过下述披露范围的必要限度内，根据实际情况出境相应的个人信息。

我们出境您的个人信息以及高盛总部处理您的个人信息，主要出于如下目的：

- **投资银行类业务：**鉴于跨境并购交易、融资项目的业务性质，高盛集团的境内外实体可能会共同参与该类业务项目，以便推进跨境并购交易、融资项目（包括客户身份识别、开展尽职调查与合规审查等环节），并保障高盛集团对于客户服务、内部控制与审查、交易项目执行的全球统一标准。
- **资产管理类业务：**高盛集团作为金融机构，对客户的股权发行、债权发行和并购等项目均需执行高盛集团内部统一的客户身份识别流程（即了解你的客户/KYC），以判断客户身份真实性、防范洗钱风险。而且，高盛集团对于资产管理类交易项目需执行高盛集团内部统一的风控标准，包括进行交易预订、验证支付细节、支付处理和收款流程，以保障交易安全与资金安全。高盛集团亦会就尽职调查、电话回访、建立业务关系、内部记录、合规以及其他相类流程处理个人信息。
- **供应商管理：**高盛总部需要对全球各地（包括位于中国境内）的子公司、关联公司等实体进行统一的供应商管理，以便与供应商进行业务合作及沟

通联络，并向供应商传达并要求落实高盛集团统一的供应商管理政策和计划。

出境所涉的个人信息主要包括以下类型（其中，具体场景可能涉及的敏感个人信息已加粗显示）：

- **投资银行类业务：**客户的法定代表人及/或授权人的**身份证复印件或护照复印件**；客户的董事、管理层、核心人员及股东的姓名、照片、工作履历、教育背景、手机号码、电子邮箱地址、**身份证/护照号码**；客户员工的姓名、联系方式；客户的供应商、主要客户等第三方尽职调查中的联系人的姓名、联系方式、照片、**身份证复印件**、尽调地点。其中，身份证件相关信息主要是为了判断客户身份的真实性、防范洗钱风险、确保尽职调查的真实性。
- **资产管理类业务：**姓名、性别、国籍、出生日期、地址、电话号码、电子邮箱地址、教育经历、工作经历（包括目前所属公司、职业、职务/职位等）、**交易信息（交易金额、交易份额、交易时间、产品/服务名称、付款方式等）、银行账户信息（银行账号、银行名称）、银行卡正反面复印件、护照号码及护照复印件、身份证号码及身份证复印件、财务状况（收入来源、数额、资产、债务等）、税收居民身份、贷款资料、投资经验、投资目标（投资期限、品种、期望收益等）、风险偏好及可承受的损失、诚信记录、基金代扣代缴个人所得税金额等。**
- **供应商管理：**供应商联系人的姓名、联系电话、电子邮箱地址。

您的上述个人信息在出境后将在高盛集团统一部署的信息系统和数据库中进行存储，并仅在上述处理目的的范围内，由高盛总部的相关人员在权限范围内进行查阅、使用。此外，在实现下述目的所需的合理必要范围内，高盛总部可能向位于中国境外的下列第三方再转移您的个人信息：

- 为执行跨境并购、融资等交易项目，向高盛集团内承担投资银行类业务职能的关联方提供其所参与的交易项目中企业客户的相关信息；
- 为执行跨境并购、融资等交易项目，向交易相关方/境外投资者提供其所参与的交易项目中企业客户的相关信息；
- 在境内企业境外发行项目中，为满足金融监管机构的监管要求，向中国香港证监会、香港联交所等监管机构提供发行人（即企业客户）等的信息；
- 为实现集团范围内对供应商的统一管理，向高盛集团内承担供应商管理相关职能的关联方提供供应商的相关信息；
- 为实现集团范围内对信息系统及数据中心的统一管理，委托信息系统及数据中心的供应商提供数据存储和运维服务。

在您与本公司的业务合作过程中，由您所提供的他人的个人信息，包括但不限于您所属/相关的公司、机构或关联方的相关人员的个人信息，以及您及您所属/相关的公司、机构或关联方在业务经营过程中取得和使用的信息（其中可能包括他人的个人

信息），请您确保他人对上述出境情况充分知情并予以同意（或满足其他合法性基础），且您的该等行为不侵犯任何人的合法权益。

在您的个人信息出境后，您可以继续通过本项政策“九、联系我们”中的联系方式联系我们，或直接联系高盛总部，来行使您的个人信息相关权利。

关于高盛总部如何处理和保护您的个人信息、以及您如何联系高盛总部行使您的个人信息相关权利的更多信息，详见高盛总部的隐私政策（网址为：<https://www.goldmansachs.com/privacy-and-cookies/index.html>）。

四、个人信息的存储

（一）存储地点

原则上，我们将在中国境内（仅为本项政策之目的，仅指中国大陆地区，不包含香港特区、澳门特区、台湾地区）收集和产生的个人信息存储在中国境内。

与此同时，我们通过高盛集团全球范围内的资源为您提供产品和服务、和/或与您建立/开展其他业务合作，这意味着，我们可能需要将您的个人信息出境至中国境外的其他国家或地区，详见本项政策“三、个人信息的出境”。

（二）存储期限

一般而言，我们只会在实现处理目的的必要合理期限内保留您的个人信息，除非法律法规另有规定。我们一般根据以下原则确定存储期限：

1. 我们的个人信息记录、删除及保存政策规定了有关保存、处理和处置个人信息的一般标准和程序。个人信息的存储期限根据该等政策执行并以实现合法业务目的为限。
2. 如果相关法律法规、监管要求、或者我们与您的合作协议中规定或约定了更长的存储期限，该等存储期限将优先适用。

在超出存储期限后，我们会依法删除或匿名化处理您的个人信息。如果删除从技术上难以实现的，我们会停止除存储和采取必要的安全保护措施之外的处理活动。

五、个人信息的安全保障

1. 我们力争实施业界最高标准的安全措施，从而保证您的个人信息的高度保密。我们已使用符合业界标准的安全措施保护您的个人信息，并设立了一系列的物理性、技术性、管理性、程序性防范措施，从而保障您的个人信息免于未经授权的访问、泄露、篡改、丢失、滥用、毁损。我们采取的具体措施包括但不限于：
 - 有专职人员负责设计、实施并监控本公司的信息安全措施；
 - 使用专业技术（例如，防火墙）；

- 在产品和服务通过互联网推出之前，对安全性和可操作性进行测试，并对公众所知的技术弱点进行持续扫描监控；
 - 对本公司的网站和服务进行内部和外部审查；
 - 监控本公司的系统基础设施，发现薄弱环节和潜在的入侵可能；
 - 对进入相关系统或网站的身份确认、鉴别和授权实施控制；
 - 通过加密或其他方式保护非公开的信息沟通；
 - 向我们的相关人员提供培训，并根据新的风险和技术发展，不断更新安全措施。
2. 我们会采取一切合理可行的措施，确保未收集无关的个人信息。
 3. 只有经过授权的本公司的员工、代理和服务提供者（如本项政策“二、个人信息的委托处理、共享、转让、公开披露”所述）才有权接触您的个人信息，且上述人士必须遵守严格的保密要求。
 4. 我们将根据法律法规的要求适时开展个人信息保护影响评估。
 5. 我们将尽力确保您的个人信息的安全性，但请您理解，互联网环境并非百分之百安全。如果我们的物理、技术或管理防护设施遭到破坏，导致您的个人信息遭受未经授权的访问、泄露、篡改、丢失、滥用、毁损，致使您的合法权益受损，我们将依法承担相应的责任。
 6. 我们制定了个人信息安全事件应急预案，并注意风险的监测与预防。如果不幸发生个人信息安全事件，我们会立即启动应急预案、采取补救措施，尽力降低安全事件的影响。我们将通过邮件、信函、电话、推送、公告等合理、有效的方式，依法告知您安全事件的原因、危害、涉及个人信息的类型、补救措施等事项。我们还将依法向有关监管机构上报安全事件的相关情况。

六、您对个人信息的权利与选择

我们充分尊重您对个人信息享有的合法权利与选择，并竭力保障您行使该等权利。

1. **知情、决定：**您对我们如何处理您的个人信息享有知情权、决定权，您可以限制或者拒绝我们对您的个人信息进行处理，除非法律法规另有规定。您有权要求我们对您的个人信息所适用的处理规则进行解释说明。
2. **查阅、复制、转移：**您有权向我们查阅、复制您的个人信息。在符合法律法规的条件下，您还有权请求我们将您的个人信息转移至您指定的个人信息处理者，我们会依法为您提供转移的路径。
3. **更正、补充：**如果您发现您的个人信息不准确或者不完整，您有权向我们提出更正、补充的请求，我们会在核实之后及时进行更正、补充。
4. **撤回同意：**对于基于您同意的个人信息处理活动，您有权撤回同意。请您注意，当您撤回同意后，我们可能无法继续为您提供与该等同意相对应的产品或服务

和/或与您保持与该等同意相对应的其他业务合作，但不会影响此前基于您的同意已进行的个人信息处理活动。

5. **删除：**在法律法规规定的情形下，您有权请求我们删除您的个人信息，该等情形包括：处理目的已实现、无法实现或者为实现处理目的不再必要；我们停止提供相应产品或者服务；存储期限已届满；您撤回同意；我们的处理活动违法法律法规或与您的约定等。若法律法规规定的存储期限未届满，或者删除个人信息从技术上难以实现，我们将停止除存储和采取必要的安全保护措施之外的处理活动。
6. **注销账户：**您有权申请注销您的账户，在您注销账户后，我们将在存储期限届满后删除相关个人信息。
7. **已故人士个人信息保护：**如果个人信息主体不幸逝世，您作为近亲属，为了自身的合法、正当利益，您可以依法对逝者的相关个人信息行使查阅、复制、更正、删除等权利，除非逝者生前另有安排。
8. **响应您的请求：**如您希望行使上述的一项或多项权利，您可以通过本项政策“九、联系我们”中所提供的联系方式向我们提出请求。

为保障安全，我们可能需要您提供书面请求，或以其他方式证明您的身份，然后再处理您的请求。我们将尽快处理您的合理请求，并在验证您的身份后的 15 个工作日内予以回复。

对于您合理的请求，我们原则上不收取费用，但对多次重复、超出合理限度的请求，我们将视情况收取一定成本费用。对于无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变现行惯例）、给他人合法权益带来风险或者非常不切实际的请求，我们可能会予以拒绝。

9. **投诉与起诉：**如果您对我们的回复不满意，特别是您认为我们的个人信息处理活动损害了您的合法权益，您可以依法向证券监督管理机构、网信部门等监管机构投诉或向法院提起诉讼。

七、未成年人的个人信息保护

我们高度重视对未成年人个人信息的保护。我们的产品和服务和/或其他业务合作主要面向成年人。如果您是 18 周岁以下的未成年人，在使用我们的产品或服务或/或与我们建立/开展其他业务合作前，您应在您的父母或其他监护人的陪同下阅读并同意本项政策。

特别地，我们原则上不会处理 14 周岁以下未成年人（以下简称“儿童”）的个人信息。我们不会有意地获取儿童的个人信息，如果我们发现我们在无意的情况下收集了儿童的个人信息，我们会尽快删除该等信息。

八、隐私政策的更新

我们可能不时对本项政策进行调整，并将在本公司网站上及时公布本项政策的变更情况。对于本项政策的重大变更，我们将会以更显著的方式通知您，例如，邮件、推送、公告等适当形式。未经您的知情和同意（如适用），我们不会削减您按照本项政策所享有的权利。

本项政策的重大变更包括但不限于：

- 我们的业务、产品或服务的模式发生重大变化，影响到个人信息处理目的、处理方式、处理的个人信息类型；
- 我们在所有权结构、组织架构等方面发生重大变化，导致处理个人信息的主体发生变化；
- 个人信息共享、转让、公开披露的主要对象发生变化；
- 您行使个人信息权利的方式和程序发生重大变化；
- 我们的个人信息保护专职部门或专员的联系方式发生变化；
- 我们的个人信息保护影响评估提示存在高风险；
- 其他可能对您的个人权益有重大影响的情形。

我们会在本公司网站上（如适用）发布对本项政策所做的任何变更。

本项政策的上一版本为《高盛（中国）证券有限责任公司隐私政策》（于 2022 年 1 月 20 日生效，简称“**原政策**”），我们按照本公司目前最新的业务情况与个人信息处理情况对原政策进行了更新，形成本项政策。本项政策将取代原政策，并适用于包括但不限于高盛（中国）证券有限责任公司在内的高盛集团在中国境内的多个公司，详见本项政策“附录 2：高盛中国境内公司列表”。

九、联系我们

我们设立了个人信息保护专职部门或专员，如果您对本项政策有任何疑问、意见或建议，您可以通过以下方式与我们联系：

- 电子邮箱：gscn-privacy-info@goldmansachs.cn

《高盛中国隐私政策》附录 1：相关定义

为了帮助您更好地理解本项政策,我们在本附录 1 中向您介绍以下专有名词的定义。

个人信息：指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。

敏感个人信息：指一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息。例如，生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。

匿名化：指个人信息经过处理无法识别特定自然人且不能复原的过程。匿名化处理后的信息不再属于个人信息。

处理：包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

《高盛中国隐私政策》附录 2：高盛中国境内公司列表

- 高盛（中国）证券有限责任公司（包括但不限于：北京英蓝证券营业部、上海证券承销保荐分公司、上海浦东新区世纪大道证券营业部、深圳中心四路证券营业部）
- 北京高盛宽街博华股权投资管理有限公司
- 高盛（中国）有限责任公司北京代表处
- 高盛（中国）有限责任公司上海代表处
- 英国高盛国际银行无限责任公司北京代表处
- 杰润（中国）商贸有限公司
- 乾坤期货有限公司
- 北京高盛顾问有限公司（包括但不限于：上海华鼎墨创管理咨询分公司）
- 北京高华盛泽投资管理有限责任公司
- 高盛（中国）资本有限公司
- 高盛（北京）企业管理有限责任公司（包括但不限于：上海分公司）
- 上海墨盛资产管理有限公司
- 北京墨盛资产管理有限公司
- 重庆市经济技术开发区庆盛小额贷款有限公司
- 重庆庆盛企业顾问有限公司
- 重庆庆盛创南企业顾问有限公司
- 北京宽街博华贰零壹壹投资中心（有限合伙）
- 北京宽街博华投资管理中心（有限合伙）
- 北京宽街博华投资中心（有限合伙）
- 上海宽街投资中心（有限合伙）

Goldman Sachs China Privacy Policy

Effective Date: April 24, 2024

The Goldman Sachs China Privacy Policy (hereinafter referred to as the “**Policy**”) is a notification and general statement regarding the processing and protection of your personal information by subsidiaries and affiliates of the Goldman Sachs Group in China (hereinafter referred to as “**we**” or the “**Company**”, respectively or collectively; please refer to “Appendix 2: List of Goldman Sachs Companies in China” for the names of companies located in China) to the extent applicable under the Personal Information Protection Law of the People’s Republic of China (“**Personal Information Protection Law**”).

This Policy applies where we provide products or services for you and/or establish/conduct other business cooperation with you, including where we coordinate with overseas companies of the Goldman Sachs Group to provide products or services for you and/or establish/conduct other business cooperation with you. For the specific products or services provided by the Company and/or other specific business cooperation established/conducted by the Company with you, we may also provide you with a specific privacy policy or other statement (hereinafter referred to as the “**Supplementary Policy**”) other than this Policy, and **if there is any inconsistency between the Supplementary Policy (if any) and this Policy, the provisions of the Supplementary Policy shall prevail.**

We highly value the protection of your personal information and have therefore formulated this Policy, and will collect, use, share, store or otherwise process (collectively “**process**”) and protect your personal information in accordance with this Policy. Before you begin to use our products or services and/or establish/conduct other business cooperation with us, please make sure that you read and understand this Policy carefully, **especially the provisions highlighted in bold**, and decide whether or not you consent to our processing of your personal information accordingly. **Please note that if the processing of certain personal information is necessary to provide you with certain products or services and/or to establish/conduct certain other business cooperation with you, then your refusal to allow us to process such personal information or your refusal to provide such personal information to us may interfere with your access to certain of our products or services and/or establishing/conducting certain other business cooperation with us. In addition, we may collect, use or otherwise process your personal information in accordance with this Policy without your consent if permitted by law. We will seek your separate consent with respect to specific processing of your personal information if required by law.**

We understand the importance of personal information to you and will do our best to ensure the security of your personal information. We are committed to maintaining your trust in us by adhering to the following principles established by the Personal Information Protection Law when processing personal information: the principle of legality, legitimacy, necessity and good faith, the principle of explicit purpose, the principle of transparency, the principle of quality assurance, and the principle of security safeguard. Meanwhile, we

commit to taking appropriate security measures to protect your personal information in accordance with the industry-recognized security standards.

This Policy mainly consists of the following contents:

- I. [Collection and Use of Personal Information](#)
- II. [Entrusted Processing, Sharing, Transfer and Public Disclosure of Personal Information](#)
- III. [Export of Personal Information](#)
- IV. [Storage of Personal Information](#)
- V. [Security Safeguard of Personal Information](#)
- VI. [Your Rights and Choices to Personal Information](#)
- VII. [Protection of Minors' Personal Information](#)
- VIII. [Updates to the Privacy Policy](#)
- IX. [Contact Us](#)

[Appendix 1: Relevant Definitions](#)

[Appendix 2: List of Goldman Sachs Companies in China](#)

I. Collection and Use of Personal Information

In order to provide you with our products or services and/or to establish/conduct other business cooperation with you, we may need to collect and use your personal information, including the personal information provided by you during your communication, contact and cooperation with us, or the personal information generated when using our products or services and/or establishing/conducting other business cooperation with us. **During this process, if you provide us with other individuals' personal information, please ensure that such individuals have been fully informed and have given their consent to such processing (or other legal bases apply); and your such acts will not infringe upon any person's legitimate rights and interests.**

We collect and use your personal information mainly in the following scenarios. We hereby describe the purposes of processing, the manners of processing, and the categories of personal information (**among others, please pay special attention to the sensitive personal information that is highlighted in bold, which may have more significant impacts on you**) involved in each scenario as follows. **For more detailed descriptions on the collection and use of personal information, please also refer to the application forms, product introductions, service descriptions and other materials we provide when offering products or services to you and/or establishing/conducting other business cooperation with you (if any). In most scenarios, the processing of your personal information is necessary for us to enter into and perform the contract between you and us, or is necessary for us to fulfill our legal obligations. In a few**

scenarios, we may need to process your personal information based on your consent, and we will explain and seek your consent in such scenarios.

(i) Opening and Maintenance of Investor's Account

The primary source of the personal information we collect from you is the investor account application you fill in and other forms and materials you provide to us in the course of your establishing/conducting business relationship with us. We may also collect transaction information and related experiences concerning the products and services offered by our Company.

You may, at your own discretion, decide to provide us with materials containing your (and/or other individuals') personal information or not. However, please be aware that **in order to use our Company's products or services, you are required to provide us with personal information necessary to open and maintain investor's account; otherwise, we may not be able to open your account and provide corresponding products or services.**

1. If you approach us to seek products or services as an individual (i.e., you make an investment as an individual client), we may collect and use the following personal information about you (depending on your identity):

- Your name, gender, age, date of birth, nationality, address, country of permanent residence, contact information (such as mobile phone number, email address and landline number);
- Your education experience, working experience, occupation/position, employee certificate, marital status, **bad credit record** (if applicable), **asset status and relevant certificates, investment experience and relevant certificates;**
- **Type, number and term of validity of your valid identity card;**
- **Bareheaded photo taken from your passport, identity card or driver's license** for the purpose of due diligence or as required by laws and regulations (if applicable);
- **Video recording of you opening an account in the Company either on site or remotely** in accordance with business guidelines of self-regulatory authorities (if applicable), etc.

2. If you are the controlling shareholder, actual controller, or actual beneficiary of a transaction, legal representative/executive partner (or his/her designated representative), authorized representative or employee of a corporate client or institutional client of the Company, we may collect and use the following personal information about you (depending on your identity) during the process of establishing business relationship or conducting business cooperation with your affiliated or related company or organization:

- Your name and contact information (such as mobile phone number, email address);
- Your affiliated or related company or organization and position;
- **Type, number and term of validity of your valid identity card;**

- **Color photocopy or photo of your valid identity card** provided by you in accordance with the requirements of anti-money laundering and other laws and regulations, etc.

As for other individuals' personal information provided by you during your business cooperation with the Company, including but not limited to the personal information of aforementioned personnel of your affiliated or related company, organization or affiliate, and the information (which may include other individuals' personal information) acquired and used by you or your affiliated or related company, organization or affiliate during business operation, **please make sure that those individuals have been fully informed and have given their consent to such processing (or other legal bases apply), and your acts will not infringe upon any person's legitimate rights and interests.**

To ensure the personal information we possess is accurate and complete, please notify us of any changes to the personal information that you have provided to us in a timely manner, which will be of great assistance to us.

(ii) Other Scenarios Related to Business Operation

1. **When carrying out investment banking business, the Company is required to conduct project due diligence in accordance with laws and regulations. If you are the founder, major shareholder, actual controller, director, senior officer or employee of the Company's corporate client or institutional client (including but not limited to the project issuer), and/or the interviewee participating in the due diligence on behalf of any major customers or key vendors of the project issuer, we may collect and use the following personal information about you (depending on your identity) during the due diligence process:**

- Your name, nationality, contact information (such as mobile phone number and email address) and due diligence location;
- Your resume (including work experience and education background, etc.), photo, current company and your position;
- **Type, number and term of validity of your valid identity card, and/or the copy or photo of your valid identity card;**
- You and your relatives' **direct/indirect shareholding** and employment status **in the project issuer**, etc.

As for other individuals' personal information provided by you during your business cooperation with the Company, including but not limited to the personal information of aforementioned personnel of your affiliated or related company, organization or affiliate, and the information (which may include other individuals' personal information) acquired and used by you or your affiliated or related company, organization or affiliate during business operation, **please make sure that those individuals have been fully informed and have given their consent to such processing (or other legal bases apply), and your acts will not infringe upon any person's legitimate rights and interests.**

2. **When carrying out asset management business, the Company is required to conduct project due diligence and compliance review in accordance with relevant laws and regulations. If you are the counterparty of the Company's asset**

management business, we may collect and use your personal information (depending on your identity) in the course of establishing business relationship, conducting customer identification and due diligence, transaction, post-investment management, or conducting specific project phases, specifically as follows:

- **Phase of Establishing Business Relationship**

In order to establish and manage a business relationship with you, we may collect and use your name, address, telephone number, email address, current company, position, etc. If you do not provide us with such information, we may not be able to contact you, which may affect the business.

- **Phase of Customer Identification and Due Diligence**

In order to comply with the requirements of applicable laws and regulations on customer identification and due diligence, we may collect and use your name, gender, nationality, date of birth, telephone number, email address, **transaction information, bank account information (bank account number, name of the bank), a copy of the front and back of bank card**, education experience, work experience, occupation, position, **passport number and a copy of passport, number of identity card and a copy of identity card, financial status and relevant certificates (source of income, amount, assets, debts, etc.), tax resident status, loan information, investment experience and related certificates, investment objectives (investment period, variety, expected return, etc.), risk appetite and loss tolerance, credit records**, and other relevant information required by laws and regulations and/or relevant internal policies. If you do not provide the aforementioned personal information, we will not be able to complete the corresponding customer identification and due diligence obligations under applicable laws and regulations and/or the requirements of relevant internal policies, which will in turn affect the progress of the relevant project phase.

- **Phase of Transaction**

For the purposes of considering, evaluating, proposing, advancing or completing the relevant transaction, signing the relevant transaction documents, making payments (including making transaction bookings, verifying payment details, processing payment, and undergoing collection processes), making telephone callbacks, etc., we may collect and use your name, telephone number, email address, **transaction information (transaction amount, transaction share, transaction time, product/service name, payment method, etc.), bank account information (bank account number, name of the bank), a copy of the front and back of bank card**, education experience, work experience (including the current company, occupation, position/title, etc.), **passport number and a copy of passport, number of identity card and a copy of identity card, financial status (source of income, amount, assets, debts, etc.), tax resident status, loan information, investment experience, investment objectives (investment period, varieties, expected returns, etc.), risk appetite and loss tolerance, credit records, amount of personal income tax withheld and paid by the fund on behalf of the individual** and other relevant information. If you do not provide

the aforementioned personal information, we will not be able to fulfill the aforementioned purposes related to the transaction, which will in turn affect the progress of the relevant project phase.

- **Phase of Post-Investment Management**

In order to fulfill our obligation of appropriateness management, we may collect and use your name, telephone number, e-mail address, **bank account information (bank account number, name of the bank), a copy of the front and back of bank card**, education experience, work experience (including the current company, occupation, position/title, etc.), **passport number and a copy of passport, number of identity card and a copy of identity card, financial status (source of income, amount, assets, debts, etc.), tax resident status, loan information, investment experience, investment objectives (investment period, variety, expected return, etc.), risk appetite and loss tolerance, credit records** and other relevant information that we are required to collect by other applicable laws and regulations or relevant internal policies. If you do not provide the aforementioned personal information, we will not be able to fulfill our post-investment management obligations.

We may also collect and use your name, **identity card number, bank account information (bank account number, bank name) (if you authorize us to handle tax refund for you), amount of personal income tax withheld and paid by the fund on behalf of the individual, transaction information (transaction amount, transaction share, transaction time, name of products/services, payment method, etc.), telephone number, email address, copy of the front and back of bank card**, education experience, work experience (including the current company, occupation, position/title, etc.), **passport number and a copy of passport, number of identity card and a copy of identity card, financial status (source of income, amount, assets, debts, etc.), tax resident status, loan information, investment experience, investment objectives (investment period, variety, expected return, etc.), risk appetite and loss tolerance, credit records**. If you do not provide the aforementioned personal information, we will not be able to carry out the relevant project processes, such as carrying out the relevant post-closing activities (including but not limited to executing an exit strategy).

We also use the collected personal information for our internal record-keeping, compliance, and other such processes, as well as to complete relevant government processes and procedures, and to comply with and fulfill relevant legal requirements.

In addition, at certain phases of a project, we may also provide you with separate documents relating to the processing of personal information in order to disclose to you more details about the processing of personal information or to collect more personal information about you.

As for other individuals' personal information provided by you during your business cooperation with the Company, including but not limited to the personal information of aforementioned personnel of your affiliated or related company, organization or affiliate, and the information (which may include other individuals' personal information) acquired

and used by you or your affiliated or related company, organization or affiliate during business operation, **please make sure that those individuals have been fully informed and have given their consent to such processing (or other legal bases apply), and your acts will not infringe upon any person's legitimate rights and interests.**

3. **When carrying out securities investment consulting business**, the Company will cooperate with industry experts based on its business operation needs, including but not limited to engaging industry experts to assist to review or optimize the research reports of the Company, organizing or inviting industry experts to participate in relevant industry seminars and panel activities. **If you are an industry expert who has established/conducted business cooperation relationship with the Company, in order to enter into and perform the contract between you and us or if you consent**, during the course of cooperation, we may collect and use your name, contact information, company, position, expertise, **bank account information (for the purpose of arrange the payment)**, etc.
4. **In order to smoothly provide you with our products or services and/or conduct other business cooperation with you and for necessary contact and communication with you**, we may collect and use your name, mailing address, telephone number, email address, fax address, etc., so as to contact with you and your designated representative (where applicable).
5. **For the purpose of continuously optimizing our products, services or business offered, or for the purpose of recommending to you other products, services or business cooperation opportunities of the Company, if you consent so**, we may collect and use your telephone number, email address to send you relevant marketing message, customer survey and questionnaire, and other contents. You may unsubscribe such contents by contacting your sales representative or following the unsubscription instructions in such contents.

(iii) Compliance Management

1. **We need to implement a strict KYC (i.e., "Know Your Customer") policy, in accordance with legal and regulatory requirements for anti-money laundering and fraud prevention.**

If you seek to use the Company's products or services as an individual (i.e., you make investment as an individual client), we may collect and use the following personal information about you (depending on your identity):

- Your name and contact information (such as mobile phone number, email address, and landline number);
- **Copy of your valid identity card;**
- Name and **copy of valid identity card** of your Authorized Person (if applicable);
- Your professional background (if applicable);
- **Information about the source of your property/funds** (if applicable), etc.

If you are a shareholder (usually applicable to the shareholders with a specified shareholding percentage), actual controller, beneficiary, legal

representative/executive partner (or his/her designated representative), director, principal officer or authorized person of a corporate client or institutional client of the Company, we may collect and use the following personal information about you (depending on your identity) during the process of establishing business relationship or conducting business cooperation with your affiliated/related company or organization:

- Your name, address, and country of residence;
- **Type, number and term of validity of your valid identity card and/or copy of your valid identity card;**
- Information about the **source of your property/funds**, professional background and **anti-money laundering (“AML”) related information**, etc.

2. **According to the requirements of relevant laws and regulations, when providing you with the relevant financial products and/or services, the Company shall fulfill the obligation of investor eligibility management such as risk tolerance assessment,** fully understand the risk level you may bear when investing in relevant financial products and/or obtaining relevant financial services, so that the relevant products and/or services provided by the Company can match your risk tolerance level. Based on this, we may collect and use the following personal information about you:

- Your name, age and contact information;
- Your education background and employment status;
- Your **financial status, investment experience and objects, risk appetite, etc., and proof of assets, investment experience, credit record, financial career experience, etc.;**
- **Guarantees you have made about the source of your property/funds (if applicable), etc.**

(iv) Tax Management

According to the Common Reporting Standard (“CRS”) and relevant laws and regulations, the Company is required to collect and submit to the relevant tax authorities the account holder’s tax resident status information.

If you are an individual account holder of the Company, during the process of establishing business relationship or conducting business cooperation with you, we may collect and use the following personal information about you:

- Your name and contact information;
- Your nationality, place of residence, place of birth and date of birth;
- **Bank account information (bank account number and name of the bank), copy of the front and back sides of bank card;**
- Your country (region) of tax residency, tax resident status, type and identification number of taxpayer, amount of individual income tax withheld and paid by the fund on behalf of the individual, etc.

If you are the controller of any corporate or institutional account holder of the Company, under certain circumstances, during the process of establishing business relationship or conducting business cooperation with your related company or organization, we may collect and use the following personal information about you:

- Your name, place of birth, place of residence, and date of birth;
- Your country (region) of tax residency, taxpayer identification number, etc.

(v) Vendor Management

If you are a vendor of the Company and its related staff (such as contact person), we may collect and use your name, contact number and email address to contact and communicate with you as necessary for smoothly using the products or services offered by you and/or conducting other business cooperation with you.

(vi) Use of Cookies and Similar Technologies

Cookie is a commonly used technology on the Internet. If you access our products or services from one or more of the Company's websites, in order to optimize your experience (e.g., to "remember" who you are, so that you do not have to re-type your password when switching from page to page) and to safeguard the security of your visit (e.g., to verify your identity, and to prevent a malicious attacker from tampering with your communications), we may store on your device one or more small text files, called Cookies. You may change your internet browser settings to receive notifications when Cookies are set or blocked. However, **if you refuse to use Cookies, the functionalities that the website can provide may be reduced, and if you refuse to use Cookies in connection with verification, you may not be able to use our website normally.**

In addition, we may collect Clickstream or similar information (e.g., information such as which pages of the website you have visited and the frequency of visit) to evaluate the Company's website traffic and the products or services that may be of interest to you.

(vii) Scenarios Where Your Consent is Not Required/Other Legal Bases

Please note that, according to laws and regulations, we may collect, use or otherwise process your personal information without your consent under the following circumstances:

- Where necessary for the conclusion and performance of a contract where the individual person is a party, or where necessary for the implementation of human resources management in accordance with the lawfully formulated labor policies and the lawfully concluded collective contracts;
- Where necessary for the performance of statutory duties or obligations;
- Where necessary to handle public health incidents, or to protect the life, health and property of natural persons in case of emergency;
- Where the personal information is processed within a reasonable scope for news reporting, public opinion supervision, and other acts for the purpose of public interests;

- Where the personal information that is made public either by the individual person or otherwise lawfully is processed lawfully within a reasonable scope;
- Other circumstances specified by laws and administrative regulations.

Please note that, anonymized information is no longer personal information, and therefore is not subject to the restrictions and protections in this Policy.

II. Entrusted Processing, Sharing, Transfer, and Public Disclosure of Personal Information

We highly value the protection of your personal information, and will entrust the processing of, share, transfer and publicly disclose your personal information only with your consent or as otherwise permitted by laws and regulations.

(i) Entrusted Processing

In the course of providing products or services for you and/or establishing/conducting other business cooperation with you, we may entrust third-party vendors to provide certain business functions. Such third parties will assist us in processing your personal information within the agreed scope and period, and will delete your personal information in a timely manner upon completion of tasks.

- We may engage service providers to provide citizen identity verification services to assist us in customer management and customer identification.
- We may engage professional service providers, such as legal advisory services and auditing services, to support certain business cooperation between you and the Company, such as conducting due diligence.

For third-party vendors entrusted with processing personal information by us, we will sign relevant agreements with them, supervise their processing activities, and require them to take appropriate security measures in accordance with relevant laws and regulations, our requirements and this Policy to ensure the security of your personal information.

(ii) Sharing

To better provide you with products or services and/or establish/conduct other business cooperation with you, we may have business cooperation with our affiliates and third parties, and share your personal information within the scope reasonable and necessary to perform such business cooperation.

We will assess the scenarios that need to share personal information, and take appropriate measures to ensure the security of your personal information, in accordance with laws and regulations. If such sharing involves the provision of personal information abroad, please also refer to “III. Export of Personal Information” of this Policy.

1. Sharing with Affiliates

To the extent reasonable and necessary to achieve the purpose of globally serving our clients and uniformly managing our operations, we may share personal information with certain affiliates (and have their partners, executive directors, senior officers, directors, and employees access, use, or process relevant personal information within

the scope of their respective duties and permissions) in the course of business operation, in order to better promote the project phases or provide services to you. The affiliates in China are detailed in “Appendix 2: List of Goldman Sachs Companies in China” in this Policy.

- In order to leverage the Goldman Sachs Group’s global market coverage and product experience to provide cross-regional, integrated and comprehensive services to clients in China, we may share your personal information with certain affiliates, so as to provide you with products, services or business cooperation relating to onshore and offshore asset allocation, transaction strategies, financing and M&A, and other aspects.
- For the purpose of unified operations and management of the Goldman Sachs Group, we may share statistical data, human resources management and other information related to our business operations with certain affiliates, which may involve your personal information.

2. Sharing with Third Parties

In the course of providing products or services and/or establishing/conducting other business cooperation with you, certain business functions may be provided by third-party vendors and/or involve cooperation with third parties. To achieve the aforementioned purposes, we need to share your personal information to the extent necessary and reasonable.

- When conducting financial products/funds sales business, according to the cooperation agreement between the Company and the product/fund managers, and without breaching any contractual, legal or other obligations, the Company may provide to product/fund managers the personal information of the investors or potential investors of the relevant products/funds, such as name, **valid identity card information, investment experience and the source of property/funds**, etc., so that the product/fund managers can implement KYC policies and fulfill the investor eligibility management obligations.
- The Company may share your personal information with potential sources of financing or co-investors (including service providers, advisors or representatives of such potential co-investors and sources of financing), in order to obtain financing or to advance a transaction.

3. Disclosure to Third Parties Such as Relevant Law Enforcement Agencies, Regulators, Governments, Courts, etc.

Disclosure to relevant law enforcement agencies, regulators, governments, courts and other third parties will be limited to the scenarios and scope that we believe to be lawful and necessary, including: (1) disclosure in accordance with the laws and regulations or regulatory requirements applicable to Goldman Sachs (in, including but not limited to, China); (2) disclosure to the extent authorized or permitted by applicable laws and regulations for the purpose of exercising, establishing or defending our legal rights; or (3) disclosure in an emergency situation where your or others’ personal or property safety may be under threat.

If disclosure to foreign law enforcement or judicial authorities is involved, especially in the investigation and evidence collection in law enforcement or judicial cases, we will strictly comply with the requirements for such disclosure under the applicable laws and regulations of China.

(iii) Transfer

In principle, we will not transfer your personal information to any company, organization or individual. **If we need to transfer your personal information as a result of merger, division, dissolution, bankruptcy, etc., we will inform you of the name and contact information of the recipient, and request the recipient to continue to abide by this Policy.** If the recipient changes the original purposes and manners of processing, it will seek your consent again as legally required, unless otherwise stipulated by laws and regulations.

(iv) Public Disclosure

We generally do not publicly disclose your personal information, unless we obtain your separate consent or as otherwise stipulated by laws and regulations.

(v) Circumstances Where Your Consent Is Not Required/Other Legal Bases

Please note that, according to the provisions of laws and regulations, we may entrust the processing of, share, transfer or publicly disclose your personal information without your consent in the following circumstances:

- Where necessary for the conclusion and performance of a contract where the individual person is a party, or where necessary for the implementation of human resources management in accordance with the lawfully formulated labor policies and the lawfully concluded collective contracts;
- Where necessary for the performance of statutory duties or obligations;
- Where necessary to handle public health incidents, or to protect the life, health and property of natural persons in case of emergency;
- Where the personal information is processed within a reasonable scope for news reporting, public opinion supervision, and other acts for the purpose of public interests;
- Where the personal information that is made public either by the individual person or otherwise lawfully is processed lawfully within a reasonable scope;
- Other circumstances specified by laws and administrative regulations.

Please note that, anonymized information is no longer personal information, and therefore is not subject to the restrictions and protections in this Policy.

III. Export of Personal Information

The “Goldman Sachs Group” is a multinational group company with global operations. To provide you with cross-regional, integrated and comprehensive services and for the purposes of the unified operation and management of the group,

we may, within a reasonable and necessary scope, transfer your personal information abroad to the headquarters of Goldman Sachs Group located in the United States – The Goldman Sachs Group, Inc. (hereinafter “Goldman Sachs Headquarters”), or allow it to access your personal information from abroad (collectively “export”). This section describes the scenarios where personal information may be exported; in a specific scenario where you use our products or services and/or establish/conduct other business cooperation with us, we will, based on the actual situation, export the relevant personal information to the necessary extent not exceeding the following disclosures.

The export of your personal information and the processing by Goldman Sachs Headquarters are primarily for the following purposes:

- **Investment Banking Business:** Given the nature of cross-border M&A transactions and financing projects, onshore and offshore entities of the Goldman Sachs Group may jointly participate in such projects, so as to facilitate the cross-border M&A transactions and financing projects (including customer identification, due diligence, compliance review, and other phases), and to ensure the global, uniform standards for customer services, internal control and review, and transaction execution in the Goldman Sachs Group.
- **Asset Management Business:** the Goldman Sachs Group, as a financial institution, is required to implement its unified internal customer identification process (i.e., Know Your Customer/KYC) for its clients’ equity issuance, debt issuance, M&A and other projects, in order to assess the authenticity of the client’s identity and to prevent money laundering risks. In addition, the Goldman Sachs Group implements its unified internal risk control standards for asset management transaction projects, including booking transaction, validating payment details, processing payment and undergoing collection processes, in order to safeguard the security of the transaction and the funds. The Goldman Sachs Group also processes personal information for due diligence, callbacks, establishing business relationship, internal record keeping, compliance and other similar processes.
- **Vendor Management:** The Goldman Sachs Headquarters shall carry out unified management of vendors of its subsidiaries and affiliates located all over the world (including in China), so as to cooperate and communicate with vendors, and to convey to vendors and require them to implement the Goldman Sachs Group’s unified policies and plans for vendor management.

The personal information involved in export mainly includes the following categories (among others, the sensitive personal information that might be involved in specific scenarios is highlighted in bold):

- **Investment Banking Business:** copy of identity cards or passports of the client’s legal representatives and/or authorized persons; name, photo, resume, education background, mobile phone number, email address, and **identity card/passport number** of the client’s directors, senior officers, core personnel and shareholders; name and contact information of employees of the client; name, contact information, photo, **copy of identity card**, and due diligence location of

the contact persons of third parties such as the client's vendors and key customers in due diligence. To be specific, the information related to identity document is for the purpose of determining the authenticity of the client's identity, preventing money laundering risks, and ensuring the authenticity of due diligence.

- **Asset Management Business:** name, gender, nationality, date of birth, address, telephone number, email address, education experience, work experience (current company, occupation, position/title, etc.), **transaction information (transaction amount, share, time, product/service name, payment method, etc.), bank account information (bank account number, name of the bank), a copy of the front and back of bank card, passport number and a copy of passport, number of identity card and a copy of identity card, financial status (source of income, amount, assets, debts, etc.), tax resident status, loan information, investment experience, investment objectives (investment period, varieties, expected returns, etc.), risk appetite and loss tolerance, credit records, amount of personal income tax withheld and paid by the fund on behalf of the individual, etc.**
- **Vendor Management:** name, phone number and email address of the contact persons of vendors.

After your personal information is exported, it will be stored in the information systems and data centers uniformly deployed by the Goldman Sachs Group, and will be accessed and used by the relevant personnel of the Goldman Sachs Headquarters within their permissions and only for the aforementioned purposes of processing. In addition, the Goldman Sachs Headquarters may onward transfer your personal information to the following third parties located outside of China to the extent reasonable and necessary to fulfill the purposes described below:

- Providing the affiliates of the Goldman Sachs Group with investment banking functions with the relevant information about corporate clients in transactions in which they are involved, in order to carry out cross-border M&A, financing and other transaction projects;
- Providing the related parties/foreign investors with the relevant information about corporate clients in transactions in which they are involved, in order to carry out cross-border M&A, financing and other transaction projects;
- Providing the Securities and Futures Commission of Hong Kong, the Stock Exchange of Hong Kong Ltd., and other regulatory authorities with the relevant information about issuers (i.e. corporate clients) and others in domestic companies' overseas offering projects, in order to meet the regulatory requirements of financial regulators;
- Providing the affiliates of the Goldman Sachs Group with vendor management functions the relevant information about vendors, in order to achieve unified management of vendors across the group;
- Entrust the vendors of information systems and data centers to provide data storage and operation and maintenance services, in order to achieve unified management of information systems and data centers across the group.

As for other individuals' personal information provided by you during your business cooperation with the Company, including but not limited to the personal information of relevant personnel of your affiliated or related company, organization or affiliate, and the information (which may include other individuals' personal information) acquired and used by you or your affiliated or related company, organization or affiliate during business operation, **please ensure that such individuals have been fully informed and have given their consent to such exporting (or other legal bases apply); and your such acts will not infringe upon any person's legitimate rights and interests.**

After your personal information is exported, you may continue to exercise your personal information related rights by contacting us through the contact information in "IX. Contact Us" of this Policy or by contacting the Goldman Sachs Headquarters directly.

More information about how the Goldman Sachs Headquarters processes and protects your personal information and how you can contact the Goldman Sachs Headquarters to exercise your personal information related rights is detailed in Privacy Policy of the Goldman Sachs Headquarters (available at <https://www.goldmansachs.com/privacy-and-cookies/index.html>).

IV. Storage of Personal Information

(i) Storage Location

In principle, the personal information we collect and generate within the territory of China (for the sole purpose of this Policy, it refers to the Chinese Mainland only, excluding Hong Kong SAR, Macau SAR and Taiwan Region) will be stored within the territory of China.

In the meantime, we will provide you with products and services and/or establish/conduct other business cooperation with you by utilizing the worldwide resources of the Goldman Sachs Group. This means that we may need to export your personal information to other countries or regions outside the territory of China, and please refer to "III. Export of Personal Information" of this Policy for details.

(ii) Storage Period

In general, we retain your personal information only for the period as reasonable and necessary to accomplish the purposes of processing, unless otherwise stipulated by laws and regulations. We generally determine the storage period based on the following principles:

1. Our policies related to personal Information retention, deletion and storage set out the general standards and procedures relating to the retention, processing and disposal of personal information. The storage period of personal information is implemented in accordance with such policies and is limited to the extent necessary to fulfill legitimate business purposes.
2. If a longer storage period is required by the relevant laws and regulations or regulatory requirements, or agreed upon in the agreements between you and us, then such storage period will prevail.

Upon expiration of the storage period, we will delete or anonymize your personal information according to laws and regulations. If deletion is technically infeasible, we will cease the processing activities other than storage and taking necessary security measures.

V. Security Safeguard of Personal Information

1. We endeavor to implement the highest standards of security measures in the industry so as to keep your personal information highly confidential. We have adopted security measures that conform to industry standards and have established a series of physical, technical, administrative and procedural precautions to protect your personal information from unauthorized access, leakage, tampering, loss, misuse or destruction. The specific measures we have taken include, but are not limited to:
 - Having dedicated staff responsible for designing, implementing and monitoring the Company's information security measures;
 - Using professional technologies (e.g., firewalls);
 - Testing the security and operability of products and services prior to their launch on the internet, and continuously scanning and monitoring any technical weaknesses known to the public;
 - Implementing internal and external reviews of the Company's websites and services;
 - Monitoring the Company's system infrastructure, and detecting vulnerabilities and potential intrusion risks;
 - Implementing controls for identification, authentication and authorization of access to relevant systems or websites;
 - Protecting non-public communications through encryption or otherwise;
 - Providing trainings to our relevant staff, and updating security measures on an ongoing basis in light of new risks and technology developments.
2. We will take all reasonable and practical measures to ensure that irrelevant personal information will not be collected.
3. Only authorized employees, agents and service providers of the Company (as described in "II. Entrusted Processing, Sharing, Transfer and Public Disclosure of Personal Information" in this Policy) are allowed to access your personal information, and these persons must comply with the strict confidentiality requirements.
4. We will conduct impact assessment on personal information protection as required by laws and regulations in due course.
5. We will do our best to ensure the security of your personal information, however, please understand that the internet environment is not 100% secure. If our physical, technical or administrative precautions are compromised, resulting in unauthorized access, leakage, tampering, loss, misuse or destruction of your personal information,

leading to damages to your legitimate rights and interests, we will bear corresponding legal liabilities.

6. We have developed an emergency plan for personal information security incidents and we pay attention to risk monitoring and prevention. If, unfortunately, a personal information security incident occurs, we will immediately initiate the emergency plan, take remedial measures, and strive to minimize the impacts of the incident. We will, in accordance with laws and regulations, inform you of the incident through email, letter, phone call, push, announcement, or other reasonable and effective means, to explain the cause and harm of the security incident, the categories of personal information involved, the remedial measures, and other information. We will also report the relevant information about the security incident to the relevant regulatory authorities in accordance with laws and regulations.

VI. Your Rights and Choices to Personal Information

We fully respect your legal rights and choices to your personal information, and strive to ensure your exercise of such rights.

1. **To know and decide:** You have the right to know and decide how we process your personal information. You may restrict or refuse our processing of your personal information, unless otherwise stipulated by laws or regulations. You also have the right to request us to explain the processing rules applicable to your personal information.
2. **To access, copy and transfer:** You have the right to access and copy your personal information. Subject to the conditions under laws and regulations, you also have the right to request us to transfer your personal information to your designated personal information handler, and we will provide a way of such transfer in accordance with laws and regulations.
3. **To correct and supplement:** If you find any inaccuracy or incompleteness in your personal information, you have the right to request us to correct and supplement, and we will make timely correction and supplementation after verification.
4. **To withdraw consent:** For the personal information processing activities that are based on your consent, you have the right to withdraw your consent. Please note that, **after you withdraw your consent, we may not be able to continue providing the products or services and/or maintaining other business cooperation with you that correspond to such consent, but it will not affect any previous personal information processing activities that have been conducted based on your consent.**
5. **To delete:** You have the right to request us to delete your personal information under the conditions as stipulated by laws and regulations, including: if the purpose of processing has been achieved, is unattainable, or is no longer necessary for achieving the purpose of processing; if we cease to provide the relevant products or services; the storage period has expired; if you withdraw your consent; if our processing activities violate laws and regulations or the agreements with you, etc. If the storage period as required by laws and regulations has not expired or if it is technically infeasible to delete the personal information, we will stop the processing activities other than storage and taking necessary security measures.

6. **To cancel your account:** You have the right to apply for the cancellation of your account. After you cancel your account, we will delete relevant personal information after the expiration of the storage period.
7. **Protection of deceased person's personal information:** If the personal information subject passes away, you, as a close relative of such person, are entitled to exercise the rights to access, copy, correct and delete relevant personal information of the deceased person, for your lawful and legitimate interests, unless the deceased person has made other arrangements during his/her lifetime.
8. **Responding to your requests:** If you wish to exercise one or more of the above rights, you may make a request through the contact information provided in "IX. Contact Us" of this Policy.

For security purposes, we may need you to submit a written request or otherwise verify your identity before we handle your request. We will handle any reasonable request you may make as soon as possible, and will respond to you within 15 business days upon verifying your identity.

We generally do not charge for your reasonable requests, but for repeated requests and requests exceeding reasonable extent, we may charge a certain cost depending on the situation. We may refuse requests that are unreasonably repetitive, require excessive technical measures (for example, where we need to develop a new system or fundamentally change the current practices), pose risks to the legitimate rights and interests of others, or are very impractical.

9. **Complaint and lawsuit.** If you are not satisfied with our response, in particular, if you think our personal information processing activities have infringed upon your legitimate rights and interests, you may file a complaint with the securities regulatory authorities, cyberspace administration authorities or other regulatory authorities, or file a lawsuit with the court.

VII. Protection of Minors' Personal Information

We highly value the protection of minors' personal information. Our products and services and/or other business cooperation are primarily targeted at adults. **If you are under the age of 18, before using our products or services and/or establishing/conducting other business cooperation with us, you should read and consent to this Policy with the presence of your parent or other guardians.**

In particular, we will, in principle, not process the personal information of minors under the age of 14 ("**children**"). We do not intentionally collect any personal information of children, and if we find that we have inadvertently collected personal information of a child, we will delete such information as soon as possible.

VIII. Updates to Privacy Policy

We may adjust this Policy from time to time, and will post any changes to this Policy on the Company's website in a timely manner. **If there are material changes to this Policy,**

we will notify you in a more prominent manner, such as by email, push, announcement, or other proper means. **We will not impair any of your rights under this Policy without your awareness and consent (if applicable).**

Material changes in this Policy include, but are not limited to:

- Major changes in the mode of our business, products or services, which affects the purposes and manners of processing personal information, and the categories of personal information processed;
- Major changes in our ownership structure and organizational structure, which results in changes in the entity that processes personal information;
- Changes in the major recipients of personal information sharing, transfer or public disclosure;
- Major changes in the methods and procedures for you to exercise personal information rights;
- Changes in the contact information of our specialized department or personnel in charge of personal information protection;
- Indication of high risk in our impact assessment on personal information protection;
- Other circumstances that may materially affect your personal rights and interests.

We will post any changes to this Policy on our website of the Company (if applicable).

The previous version of this Policy was the “Privacy Policy of the Goldman Sachs (China) Securities Company Limited” (effective as of January 20, 2022, hereinafter “**Original Policy**”). This Policy has been updated in accordance with the Company’s latest businesses and personal information processing activities. This Policy will replace the Original Policy and applies to multiple entities within the Goldman Sachs Group in China, including without limitation, the Goldman Sachs (China) Securities Company Limited, and for details please refer to “Appendix 2: List of Goldman Sachs Companies in China” of this Policy.

IX. Contact Us

We have established specialized department or personnel in charge of personal information protection. If you have any questions, comments or suggestions regarding this Policy, please do not hesitate to contact us through the following means:

- E-mail: gscn-privacy-info@goldmansachs.cn

Goldman Sachs China Privacy Policy - Appendix 1: Relevant Definitions

To help you better understand this Policy, we introduce to you the definitions of the following terms in Appendix 1.

Personal Information: means all kinds of information recorded electronically or otherwise that is related to an identified or identifiable natural person, excluding the anonymized information.

Sensitive Personal Information: means the personal information whose leakage or illegal use may easily infringe upon personal dignity or endanger personal and property safety. For example, biometric information, religious belief, specific identity, medical health, financial accounts, whereabouts, and the personal information of minors under the age of 14.

Anonymization: means the process of processing the personal information so that it cannot identify a specific natural person and cannot be restored. Anonymized Information is no longer personal information.

Processing: includes the collection, storage, use, processing, transmission, provision, disclosure, deletion, etc. of personal information.

Goldman Sachs China Privacy Policy - Appendix 2: List of Goldman Sachs Companies in China

- Goldman Sachs (China) Securities Company Limited (including but not limited to: Beijing Winland Trading Outlet, Corporate Advisory Shanghai Branch, Shanghai Pudong New Area Century Avenue Trading Outlet, Shenzhen Zhong Xin Si Road Trading Outlet)
- Goldman Sachs Broad Street (Beijing) Equity Investment Management Co., Ltd.
- Goldman Sachs (China) L.L.C. Beijing Representative Office
- Goldman Sachs (China) L.L.C. Shanghai Representative Office
- Goldman Sachs International Bank Beijing Representative Office
- J. Aron (China) Commodities Trading Company Limited
- Qian Kun Futures Co., Ltd.
- Beijing Goldman Sachs Consulting Co., Ltd. (including but not limited to: Shanghai Hua Ding Mo Chuang Management Consulting Branch)
- Beijing Gao Hua Sheng Ze Investment Management Company Limited
- Goldman Sachs (China) Capital Co., Ltd.
- Goldman Sachs (Beijing) Enterprise Management Company Limited (including but not limited to Shanghai Branch)
- Shanghai Mercer Asset Management Co. Ltd.
- Beijing Mercer Asset Management Co. Ltd.
- Qingsheng (Chongqing Eco-Tech Development Zone) Small Loan Co., Ltd.
- Chongqing Qingsheng Consulting Co., Ltd.
- Chongqing Qingsheng Chuangnan Consulting Co., Ltd.
- Beijing Kuanjie Bohua 2011 Investment Center (Limited Partnership)
- Broad Street (Beijing) Investment Management Centre (Limited Partnership)
- Beijing Kuanjie Bohua Investment Center (Limited Partnership)
- Shanghai Kuanjie Investment Center (Limited Partnership)