

Goldman Sachs UK Retirement Plan: General Privacy Notice

Who we are

We are the Trustee of the Goldman Sachs UK Retirement Plan (the “Plan”).

As the Trustee of the Plan, we hold certain personal information (known as “personal data”) about Plan members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Plan will be personal data (in other words, because we hold information from which an individual can be identified).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name, age, and date of birth
- your gender
- your address and other contact details (postal, email and telephone number) your national insurance number
- relevant employment information (including salary information, pensionable pay, employment dates, length of service)
- your pensionable service
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries and your marital status so we can pay benefits following your death
- information about your benefits under the Plan, including pensions and death benefits
- medical and other details about your health that you have given us if you apply to receive benefits on these grounds or if these details are collected for statistical purposes

In order to properly administer the Plan and to calculate and pay benefits, from time to time, we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer within the Goldman Sachs group. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Plan, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

How we use that information

The Trustee needs to hold and process the above information about you as it is needed for us to properly administer the Plan and to calculate and pay benefits. In legal terms, this means that we have a legitimate interest in holding and processing the above information. We also keep the above information in order to allow us to comply with our obligations towards members under the Plan governing documents, as well as under relevant legislation. We will not ask you to provide us with any personal data that we do not need.

Personal data relating to the Plan is held on paper and on computer systems. As the “data controller”,

the Trustee must process this information fairly and lawfully.

As part of running the Plan, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “sensitive personal data” or “special categories of personal data”). Under the data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “sensitive or special categories of personal data”. Except where the legislation allows it, this information will not be processed or passed to a third party without your explicit consent.

What else we might do with personal data

From time to time, the people or organisations with whom we share personal data may request that we transfer personal data to their operations outside the UK or the EEA (as applicable). Where this is the case, we will take appropriate steps to ensure that your personal data continues to be adequately protected in a manner consistent with this notice, and in accordance with applicable data protection laws.

The circumstances in which your personal data may be processed outside of the UK or EEA include:

- when your personal data is transferred at your request and with your express consent in relation to your own benefits (or a dependent or beneficiary, as appropriate)
- when the processing is in accordance with the EU approved standard contractual clauses in place between the data exporter and the data importer or, where relevant, the UK International Data Transfer Agreement (“IDTA”)
- the transfer is being made in accordance with the requirements of an applicable ‘data bridge’ between the UK and the relevant country or territory (such as a transfer to organisations in the United States certified under the UK Extension to the EU-US Privacy Framework from 12 October 2023)
- when the country or territory to which the data is being transferred ensure an adequate level of protection for personal information (as assessed by the UK authorities in accordance with Article 45 of the UK GDPR).

Details of any standard contractual clauses will be available from the Plan administrator.

Who we share it with

As the Trustee needs help from various advisers to properly administer the Plan, we may share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustee including companies which host the website and run our administration systems
- your current, past or future employer and other companies within the Goldman Sachs group
- the Plan’s professional advisers, including the Plan actuary, auditor, medical advisers, investment adviser and lawyers
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System in the UK and/or a payment when pensions are being paid overseas
- tracing agencies and consultants who assist the Trustee with updating Plan data or providing statistical information from time to time
- such other third parties whose services we may require to administer the Plan from time to time.

The Plan actuary has confirmed that he is also a “data controller” in respect of the personal data he holds relating to Plan members. This means he will have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your data. Our Plan actuary works for Willis Towers Watson (WTW). A copy of the Privacy Notice relating to the role of Plan actuary is available on WTW’s website at: www.willistowerswatson.com/personal-data

In addition, Aon has confirmed that they are also a “data processor” in respect of the personal data they hold relating to Plan members. Aon are the administrators of the Plan and a separate team also acts as pension advisers to Goldman Sachs International. This means they will have to comply with the requirements on data protection legislation, as well as relevant industry codes and standards, when processing your data. A copy of Aon’s Privacy Notice is available here: <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life so we can pay benefits and answer queries about your benefits.

We review the personal data held in relation to the Plan on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- If at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected.
- You can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- Where we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

Please contact the Pensions Manager on benefitsonlineemea@ln.email.gs.com.

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version as at [x date]. This notice will be updated from time to time and you can see the current version at any time on the Plan’s website at www.mypensionline.com/goldmansachs or gspensions.co.uk. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see “Who to contact” above).