

隐私政策

Privacy Policy

高盛尊重和保护个人信息，并认真对待有关个人信息的保护义务。在与您开展业务的过程中，我们将收集源自以及关于您的个人信息（包括敏感个人信息）（统称为“您的个人信息”）。我们将根据适用法律法规、相关内部政策以及本《隐私政策》（“《本政策》”）承担处理您的个人信息的责任。《本政策》旨在向您说明我们如何收集、处理、使用、存储、保护和/或对外提供您的个人信息。

GS respects and protects personal information and takes the obligations regarding the protection of personal information seriously. In the course of conducting business with you, we will collect personal information (including sensitive personal information) from and about you (collectively referred to as “**your personal information**”). We undertake the responsibility to process your personal information in accordance with applicable laws and regulations, relevant internal policies and this Privacy Policy (“**this Policy**”). The purpose of this Policy is to explain to you how we collect, process, use, store, protect and/or disclose to external parties your personal information.

1. 我们如何收集和使用您的个人信息

How we collect and use your personal information

一般来讲，我们会在如下的项目阶段收集和您的个人信息，包括但不限于：

Generally, we will collect and process your personal information during the following project phases, including but not limited to:

● 建立业务关系阶段 **Business relationship building phase**

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。

To establish and manage the business relationship with you, we may collect and use information such as your name, address, phone number, email address, current company and position. If you do not provide us with the aforementioned personal information, we may not be able to contact you, which in turn will affect the business operation.

● 客户身份识别和尽职调查阶段 **Customer identification and due diligence phase**

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、身份信息（包括教育经历、工作经历、职业、职务等）、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。

To comply with the requirements of applicable laws and regulations on customer identification and due diligence etc., we may collect and use your name, gender, nationality, date of birth, phone number, email address, **transaction information, bank account information (bank account, bank name), photocopy of front and back of bank card**, identity information (including education experience, work experience,

occupation, position etc.), **passport number and photocopy of passport, identity card number and photocopy of identity card, financial status (sources of income, amounts, assets, debts etc.), tax residency status, loan information, investment experience, investment objectives (investment term, variety, expected return etc.), risk appetite and tolerance for loss, track record of integrity**, 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 fulfill the obligations under applicable laws and regulations and/or the requirements of relevant internal policies such as customer identification and due diligence, which in turn will affect the progress of the relevant project phase.

- **交易阶段 Transaction phase**

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（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目的，进而会影响有关项目阶段的进度。

For the purposes of considering, evaluating, recommending, pushing forward or completing relevant transactions, signing relevant transaction documents, making payments (including booking transactions, validating payment details, processing payment and undergoing collection processes), and call-backs etc., we may collect and use your name, phone number, email address, **transaction information (amount, share and time of transaction, product/service name, means of payment etc.), bank account information (bank account, bank name), photocopy of front and back of bank card**, education history, work history (current company, occupation, and role/position etc.), **passport number and photocopy of passport, identity card number and photocopy of identity card, financial status (sources of income, amounts, assets, debts etc.), tax residency status, loan information, investment experience, investment objectives (investment term, variety, expected return etc.), risk appetite and tolerance for loss, track record of integrity, 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 achieve the aforementioned purposes, which in turn will affect the progress of the relevant project phase.

- **投后管理阶段 Post-investment management phase**

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（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。In order to fulfill our suitability management obligations, we may collect and use your name, phone number, email address, **bank account information (bank account, bank name), photocopy of front and back of bank card**, education history, work history (current company, occupation, and role/position etc.), **passport number and photocopy of passport, identity card number and photocopy of identity card, financial status (sources of income, amounts, assets, debts etc.), tax residency status, loan information, investment experience, investment objectives (investment term, variety, expected return etc.), risk appetite and tolerance for loss, track record of integrity** etc., and other information that we are required to collect under 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.

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（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）。

During the post-investment management phase, we may also collect and use your name, **identity card number, bank account information (bank account, bank name) (if you authorize us to process your tax refund), the amount of personal income tax withheld and paid by the fund on behalf of the individual, transaction information (amount, share and time of transaction, product/service name, means of payment etc.)**, phone number, email address, **photocopy of front and back of bank card**, education history, work history (current company, occupation, and role/position etc.), **passport number and photocopy of passport, identity card number and photocopy of identity card, financial status (sources of income, amounts, assets, debts etc.), tax residency status, loan information, investment experience, investment objectives (investment term, variety, expected return etc.), risk appetite and tolerance for loss, track record of integrity** etc. 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 the exit strategy).

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、遵守与完成有关的法律要求。

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

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。

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

2. 我们如何对外提供您的个人信息

How we disclose your personal information to external parties

除《本政策》中约定或者我们另行向您说明，我们不会向任何第三方披露和/或传输您的个人信息，也不会公开披露您的个人信息。但出于业务的需要，在以下情况中，我们可能会将您的个人信息披露和/或传输至第三方：

We will not disclose and/or transfer your personal information to any third party, nor will we publicly disclose your personal information, except as agreed in this Policy or as otherwise indicated to you by us. However, we may disclose and/or transfer your personal information to third parties for business necessity in the following circumstances:

- **委托处理**。除法律另有规定外，为了提升信息处理效率，降低信息处理成本，或提高信息处理的准确性，我们可能会委托有关合作机构代表我们来处理您的个人信息。

Entrusted Processing. Except as otherwise provided by laws, in order to improve the efficiency of information processing, reduce the cost of information processing, or improve the accuracy of information processing, we may entrust the processing of your personal information to relevant cooperating agencies on our behalf.

- **共享**。我们可能会在如下情形中与第三方共享您的个人信息，包括：

Sharing. We may share your personal information with third parties in the following circumstances, including:

- 与我们在中国境内或境外的关联方或其相应合伙人、执行董事、高管、董事、雇员、服务提供商或顾问分享您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。

To share your personal information with our affiliates in or outside of China or their respective partners, executive directors, senior officers, directors, employees, service providers, or consultants in order to better facilitate the relevant project phases and the provision of relevant services to you.

- 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等。

To share your personal information with potential financing sources or co-investors (including service providers, consultants, or representatives of such potential co-investors and financing sources) to obtain financing or push the transaction forward etc.

- 向相关的执法机构、监管机构、政府、法院或者其他第三方进行披露，并且该等披露是我们认为必要的并且是为了（1）中国或者任何适用于高盛的其他国家的法律、规则或相关规定要求进行披露；（2）在中国或者任何适用于高盛的其他国家的法律、规则或相关规定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）在您或他人的健康或安全可能受到威胁的紧急情况下进行披露。

To disclose to relevant law enforcement agencies, regulatory authorities, governments, courts or other third parties, and such disclosure is deemed necessary by us and is made (1) when required by the laws, rules or relevant

regulations of China or any other country applicable to GS; (2) to the extent authorized or permitted by the laws of China or any other country applicable to GS, to exercise, establish or defend our lawful rights; or (3) in case of emergency where the health or safety of you or another person may be threatened.

- 在开展金融产品/基金销售业务时,根据我们与产品/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,我们可能向产品/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/基金管理人依法执行 KYC 政策、履行投资者适当性管理义务等目的使用。
In carrying out the financial product/fund marketing business, according to the cooperation agreement between us and the product/fund manager, without violating any contractual obligations, legal obligations or other obligations, we may provide personal information of the investors or potential investors of the relevant product/fund, such as name, **valid identity card information, investment experience, property/fund source** etc., to the product/fund manager for their usage to enforce the KYC policy in accordance with the laws, fulfill the obligations of investor suitability management, and other purposes.

- **转让**。随着我们业务的持续发展,我们有可能进行合并、收购、资产转让或类似的交易,我们可能会因此将您的个人信息转移给新的个人信息处理者来处理。如果我们因这些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。

Transfer. As we continue to develop our business, we may conduct mergers, acquisitions, asset transfers, or similar transactions, and as a result, we may transfer your personal information to a new personal information handler to process it. If we need to transfer your personal information for these reasons, we will notify you of the name and contact information of the recipient and ask the recipient to remain bound by this Policy. If the recipient changes the original processing purpose or processing means, it will ask for your consent again in accordance with the laws, unless otherwise stipulated by laws or regulations.

- **公开**。我们不会公开您的个人信息,但适用法律要求或者您单独同意的除外。

Public Disclosure. We will not publicly disclose your personal information unless required by applicable laws or with your separate consent.

3. 我们如何存储和保护您的个人信息

How we store and protect your personal information

安全措施。我们将采取充分的安全措施来保护您的个人信息的安全,以防止未经授权或意外访问、处理、删除、遗失或使用。但请您注意,当前的技术技能无法确保个人信息的传输和存储是完全安全的或无错误的。

Security Measures. We will take adequate security measures to protect the security of your personal information from unauthorized or accidental access, processing, deletion, loss or use. However, please be noted that current technical capabilities cannot ensure that the transmission and storage of personal information is completely secure or error-free.

存储地点。我们会按照适用的中国法律法规的要求,将收集的您的个人信息存储在中国境内。但是为了实现《本政策》的目的,我们有可能将部分信息传输至境外。

Storage location. We will store your personal information in China mainland in accordance with applicable Chinese laws and regulations. However, in order to fulfill the purposes of this Policy, we may transfer some information outside of China mainland.

个人信息的跨境传输。在开展有关项目的过程中，为统一管理的目的，我们通过高盛集团全球范围内的资源提供产品和服务，这意味着，我们可能需要将在中国境内收集的个人信息传输至境外进行处理或允许境外访问您的个人信息（以下合称“出境”）。关于出境的详情，请见下方表格：

Cross-Border Transfer of Personal Information. In the course of carrying out our project, we provide products and services through the worldwide resources of the Goldman Sachs Group for the purpose of uniform management, i.e., we may need to transfer personal information collected in China mainland to overseas for processing or to allow access to your personal information from outside of China mainland (collectively referred to as “**Outbound Transfer**”). For more information about the Outbound Transfer, please refer to the table below:

境外接收方名称 Overseas Recipient's Name	境外接收方联系方式 Overseas Recipient's Contact Information	境外接收方处理个人信息的目的 Overseas Recipient's Purpose for Processing Personal Information	境外接收方处理的个人信息类型 Categories of Personal Information Processed by Overseas Recipient	境外接收方处理个人信息的方式 Means of Processing Personal Information by Overseas Recipient	向境外接收方行使个人信息相关权利的方式和程序 Means and Procedure for Exercising the Rights of the Personal Information to Overseas Recipients
高盛集团有限公司及其附属公司（“ 高盛集团 ”） The Goldman Sachs Group, Inc. and its affiliates (hereinafter referred to as “ the Goldman Sachs Group ”)	gs-am-asia-privacy-info@gs.com	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。 The Goldman Sachs Group, as a financial institution, is required to implement its standardized internal customer	《本政策》所涉及的个人信息，包括但不限于您的姓名、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（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	为实现出境数据的处理目的，境外接收方将收集、存储和使用我们出境的数据，以及可能委托关联公司、第三方服务商、中介机构处理数据。 To serve the purpose in relation to the processing of the transferred data, the overseas recipient will collect, store and use the data we transferred overseas, and may	您可以通过 gs-am-asia-privacy-info@gs.com 来行使您的个人信息相关权利。 You can exercise your rights related to personal information via gs-am-asia-privacy-info@gs.com.

		<p>identification process (i.e., Know Your Customer/KYC) for its clients' equity issuance, debt issuance, and mergers and acquisitions projects etc. to assess the authenticity of the clients' identity and prevent the risk of money laundering.</p> <p>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。</p> <p>In addition, the Goldman Sachs Group implements its standardized internal risk control standards for asset management transaction projects, including booking transactions, validating payment details, processing payment and undergoing collection processes, to safeguard the security of the transactions and the safety of the funds.</p> <p>高盛集团亦会就尽职调查、电话回访、建立业务关系、内</p>	<p>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。</p> <p>Personal information covered by this Policy, including but not limited to your name, gender, date of birth, address, phone number, email address, education history, work history (current company, occupation, and role/position etc.), transaction information (amount, share and time of transaction, product/service name, means of payment etc.), bank account information (bank account, bank name), photocopy of front and back of bank card, passport number and photocopy of passport, identity card number and photocopy of identity card, financial status (sources of income, amounts, assets,</p>	<p>entrust its affiliates, third-party service providers, and agencies to process the data.</p>	
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		<p>部记录、合规以及其他相类流程处理个人信息。</p> <p>The Goldman Sachs Group also processes personal information for due diligence, call-backs, building business relationship, internal record-keeping, compliance and other similar processes.</p>	<p>debts etc.), tax residency status, loan information, investment experience, investment objectives (investment term, variety, expected return etc.), risk appetite and tolerance for loss, track record of integrity, amount of personal income tax withheld and paid by the fund on behalf of the individual.</p>		
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保存期限。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。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。

Retention period. In general, we will only retain your personal information within a reasonable period necessary to fulfill the processing purpose, unless otherwise stipulated by laws or regulations. After the retention period expires, we will delete or anonymize your personal information in accordance with the laws. If the deletion is technically difficult to achieve, we will cease processing activities other than storage and the adoption of necessary security measures.

4. 个人信息主体权利

Rights of personal information subjects

若您有意行使中国法律赋予的个人信息相关权利（比如查询、要求查阅或要求复制个人信息的权利；要求我们更新或更正或补充您的个人信息或要求对个人信息处理规则进行解释说明的权利；对于基于同意处理的个人信息处理活动，您撤回同意的权利（若适用）；要求删除个人信息的权利；在满足法律规定的特定情况下转移个人信息副本的权利等），您可以通过如下方式联系我们：gs-am-asia-privacy-info@gs.com。

If you intend to exercise your rights related to personal information granted by Chinese laws (such as the right to inquire, right to access or right to copy your personal information; the right to request us to update, correct or supplement your personal information, or the right to request explanations of the personal information processing rules; the right to withdraw your consent to the processing of personal information which is based on your consent (if applicable); the right to request the deletion of your personal information; the right to transfer copies of your personal information under certain circumstances that meet the legal requirements etc.), you may contact us via the following means: gs-am-asia-privacy-info@gs.com.

请您注意，在中国法律允许的情况下，如果我们无法或实际操作上难以满足您的行权请求，我们将在合理时间内向您进行反馈。

Please be noted that, where permitted by Chinese laws, we will provide you with feedback within a reasonable period if we are unable to, or have practical difficulties in, fulfilling your request to exercise your rights.

5. 对《本政策》的更改 **Revision to this Policy**

我们保留对《本政策》进行任何修改的权利。如果我们这样做，我们会在适用法律法规要求时向您发送更新后的政策。如个人信息处理目的、处理方式和处理的个人信息种类发生变更的，我们将重新取得您的同意。

We reserve the right to make any revisions to this Policy. If we do so, we will send you the updated Policy when required by applicable laws and regulations. If any change related to the personal information processing purposes, processing means and the types of personal information processed occurs, we will obtain your consent again.

6. 联系我们 **Contact us**

如果您对于《本政策》有任何问题，或者想要行使您的个人信息主体权利，您可以通过如下方式联系我们：

If you have any questions about this Policy or wish to exercise your personal information subject rights, you may contact us via the following means:

- **联系方式:** gs-am-asia-privacy-info@gs.com
Contact Means: gs-am-asia-privacy-info@gs.com

7. 相关定义 **Relevant definitions**

为了帮助您更好地理解《本政策》，我们向您介绍以下专有名词的定义。

To help you better understand this Policy, we present you with the definitions of the following terminology.

- **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。
Personal information: refers to all kinds of information relating to an identified or identifiable natural person recorded electronically or by other means, excluding information that has been anonymized.
- **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。
Sensitive personal information: personal information that, once leaked or illegally used, can easily lead to infringing a natural person's human dignity or damaging his or her personal or property safety. Examples include information on biometric identification, religious belief, specific identity, medical health, financial account, and whereabouts etc., as well as the personal information of minors under the age of 14.