

1. INTRODUCTION AND OBJECTIVE

Efficient Group (Pty) Ltd (“Efficient Group”) takes your privacy and the protection of your personal information seriously, and we will only use your personal information in accordance with this policy and applicable legislation. This policy outlines how your personal information will be used by Efficient Group and applies to personal and special personal information that you provide to us or which we may collect about you from third parties. It is important that you read this policy carefully before submitting any personal information to us. By submitting personal information to Efficient Group, you provide consent to the processing of your personal information, as outlined in this policy. Please do not submit any personal information to Efficient Group if you do not agree to any of the provisions of this policy. If you do not consent to the provisions of this policy, or parts thereof, Efficient Group may not be able to enter into, or continue, its business relationship with you.

2. DEFINITIONS

In this policy, unless the context otherwise indicates:

applicable legislation	means all legislation that the Efficient Group must adhere to and includes, but is not limited to, the Protection of Personal Information Act No 4 of 2013 (“POPIA”), the Companies Act No 71 of 2008 (“Companies Act”), the Promotion of Access to Information Act No 2 of 2000 (“PAIA”) and the Employment Equity Act No. 55 of 1998;
child/children	means a natural person under the age of 18 years who is not legally competent without the assistance of a competent person to take any action or

	decision in respect of any matter concerning him-/herself;
Efficient Group and its subsidiaries	means Efficient Group (Pty) Ltd (company registration number 2006/036947/07) and its subsidiaries (as defined in the Companies Act);
personal information	<p>means information relating to you that includes, but not limited to:</p> <ul style="list-style-type: none"> a. information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth; b. information relating to education, medical, financial, criminal or employment history; c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to you; d. biometric information; e. personal opinions, views or preferences; f. correspondence sent by you that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence. g. your views or opinions of another individual; and h. your name, if it appears with other personal information relating to you or if the disclosure of your name itself would reveal information about you;

processing	<p>means any activity concerning personal information including:</p> <ul style="list-style-type: none"> a. collecting, receiving, recording, organising, collating, storing, updating, modifying, retrieving, altering, consulting or using; b. dissemination by means of transmission, distribution or making available in any other form; and/or c. merging, linking, restricting, degrading, erasing, or destroying information;
special personal information	<p>means your:</p> <ul style="list-style-type: none"> a. religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information. b. criminal behaviour to the extent that such information relates to: <ul style="list-style-type: none"> i. alleged commission of any offence; or ii. any proceedings in respect of any offence allegedly committed by you or the disposal of such proceedings;
we/us/Efficient Group	means Efficient Group (Pty) Ltd;
you/your	means any prospective, new or existing client, supplier, employee or prospective employee, service provider or other stakeholder of the Efficient Group.

3. TYPE OF PERSONAL INFORMATION

3.1 We may collect the following personal information about you:

- 3.1.1 your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, language, gender, information about your child/children or any child that you have legal guardianship over, your beneficiaries, employment details, education details, tax number, marital status, pregnancy, well-

being and financial information;

3.1.2 records of correspondence or enquiries from you or anyone acting on your behalf;

3.1.3 details of your transactions with us;

3.1.4 details of you made available on social media;

3.1.5 details of contracts that you enter into with us and carry out with us; and/or

3.1.6 special personal information that includes race or ethnicity, criminal behaviour, information about your health and biometric information such as photos, fingerprints and/or voiceprints.

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

4.1 You may provide personal information to us either directly or indirectly (e.g., through a financial advisor or agent acting on your behalf), enquiring about the products and/or service offerings of Efficient Group and its subsidiaries, or when requesting further information about us, whether in writing, through our website, social media platforms, over the phone or by any other means.

4.2 We may also collect your personal information from your appointed agent, a regulator or other third parties that may hold such information.

5. HOW WE USE YOUR COLLECTED PERSONAL INFORMATION

5.1 We may use, transfer and/or disclose your personal information for the purposes of:

5.1.1 providing you with the information, products and/or services that you have requested, and notifying you about important changes to these products and/or services;

5.1.2 managing your account or our relationship, and complying with your instructions or requests;

5.1.3 detecting and preventing fraud, money laundering and terrorist financing risk in the interest of security and crime prevention;

5.1.4 assessing and resolving complaints;

5.1.5 complying with operational, marketing, auditing, legal and record-keeping requirements;

5.1.6 verifying your identity and/or that of your beneficial owners.

5.2 We may, from time to time, contact you about products and/or services available from Efficient Group and its subsidiaries, which we believe may be of interest to you, by email, phone, text message or other means, unless you have unsubscribed from receiving such communication.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

6.1 Your personal information may be shared with Efficient Group's subsidiaries, the financial advisors who support Efficient Group subsidiaries' products and/or services and selected third parties who process information on our behalf.

6.2 We may also disclose your personal information to third parties under the following circumstances:

6.2.1 to any Efficient Group subsidiary, business partner, shareholder or other third party to:

- a. assess and monitor any of your applications or enquiries to us;
- b. determine which products and/or services may be of interest to you and/or to send you information about such products and/or services, unless you object or choose not to receive such communication; and/or
- c. have a better understanding of your circumstances and needs to provide and improve our products and/or services to you.
- d. to report on and meet shareholder objectives.

6.2.2 to any relevant person, regulatory body and/or entity for the purposes of preventing, detecting and reporting of fraud and criminal activities, identifying the proceeds of unlawful activities and combatting crime;

6.2.3 to any regulator and/or supervisory authority, including those in foreign jurisdictions, if the Efficient Group is required to do so in terms of applicable legislation;

6.2.4 to a prospective buyer or seller of any of the Efficient Group or its subsidiaries' businesses or assets, or any part thereof, subject to the parties adhering to personal information security and confidentiality requirements of applicable legislation;

6.2.5 to any person, if we are under duty to disclose or share your personal information to comply with any applicable legislation, or to protect the rights, property or safety of the Efficient Group, other clients or other third parties; and/or

6.2.6 to your financial advisor, his/her assistants and other Efficient Group employees who have a need to know for the purposes of providing information about products and/or

service offerings to you, or any other person acting on your behalf.

- 6.3 We may transfer your personal information to subsidiaries of the Efficient Group, agents, sub-contractors or third parties who conduct business in another country, including countries which may not have data privacy legislation similar to those of the Republic of South Africa. Should this happen, we will ensure that anyone to whom we transfer your personal information agrees to treat your information with the same level of protection as we offer.
- 6.4 If you do not wish for us to disclose your personal information to third parties, please contact us using the contact details below. We may, however, not be able to proceed with our business relationship with you if such disclosure is necessary but restricted by you.

7. RETENTION OF YOUR PERSONAL INFORMATION

We will retain your personal information indefinitely unless you object, in which case we will only retain it in accordance with retention periods as outlined in applicable legislation, or for longer if we need to retain it for a lawful purpose (e.g., for the purposes of complaints handling, legal processes and proceedings).

8. ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION

- 8.1 You may request the details of the personal information which we hold about you under the PAIA. Please read our [PAIA manual](#) available on our website and upon request, for more information.
- 8.2 Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by the Efficient Group, please follow the procedure included in our [PAIA manual](#).
- 8.3 You have the right to request the correction of personal information that we hold about you. The procedure to request the correction of your personal information is included in our [PAIA manual](#).
- 8.4 Please ensure that the personal information that we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, the Efficient Group may limit its services to you or elect not to proceed with a business relationship with you.
- 8.5 You have the right, in certain circumstances, to request the destruction or deletion of your personal information and, where applicable, to place a restriction on the processing of the personal information held about you. If you wish to exercise this right, please follow the

procedure in our [PAIA manual](#).

- 8.6 You have the right to object, on reasonable grounds, to the processing of your personal information unless applicable legislation provides for such processing. If you wish to object to the processing of your personal information, please follow the procedure in our [PAIA manual](#).

9. INDEMNITY

- 9.1 You hereby indemnify and hold the Efficient Group harmless from any loss, damage or injury that you may incur as a result of:

- 9.1.1 the lawful processing of your personal information;
- 9.1.2 any unintentional processing of your personal information; and/or
- 9.1.3 the provision of incorrect or incomplete personal information to Efficient Group.

10. AMENDMENTS TO THIS POLICY

- 10.1 We may amend this policy from time to time for any of the following reasons:

- 10.1.1 to provide for the introduction of new systems, methods of operation, products, services, offerings or facilities;
- 10.1.2 to comply with changes to any applicable legislation;
- 10.1.3 to ensure that our policy is clearer and more favourable to you;
- 10.1.4 to rectify any mistake that may be discovered from time to time; and/or
- 10.1.5 go any other reason which Efficient Group, in its sole discretion, may deem reasonable or necessary.

- 10.2 Any such amendment will come into effect and become part of any agreement you have with the Efficient Group when notice is given to you of the change by publication on our website (www.efgroup.co.za). It is your responsibility to check the website frequently.

11. COMPLAINTS

Should you believe that Efficient Group has used your personal information contrary to applicable legislation, you undertake to first attempt to resolve any concerns with Efficient Group. You may lodge a complaint by sending us an email to complaints@efgroup.co.za or by submitting an online complaint on our website. If you are not satisfied with the outcome of your complaint, you may have the right to lodge a complaint with the Information Regulator using the following contact details:

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/>.

12. CONTACT US

If you have any comments or questions about this policy, please contact our Information Officer at info@efgroup.co.za or call us on 087 944 7999.