



## Efficient Group (Pty) Ltd

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## PRIVACY POLICY

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## 1 INTRODUCTION

This Privacy Policy explains how Efficient Group (Pty) Ltd and its subsidiaries, namely Dinamika Fondse Bestuurders (Pty) Ltd, Efficient Board of Executors (Pty) Ltd, Efficient Corporate Solutions (Pty) Ltd, Efficient Financial Services (Pty) Ltd, Efficient Insure Advisory Services (Pty) Ltd, Efficient Private Clients (Pty) Ltd, Efficient Select (Pty) Ltd, Efficient Worksite Solutions (Pty) Ltd, Naviga Solutions (Pty) Ltd, Select Manager (Pty) Ltd, Vantage Invest (Pty) Ltd, Vantage Life Ltd and Vantage Nominees (RF) (Pty) Ltd (together referred to as “Efficient Group”, “we”, “us” or “our”) collect, use, disclose and protect personal information when you engage with us, including through our websites and digital channels, communicate with us, visit our business premises, or use our products and services. We are committed to processing personal information lawfully, reasonably and transparently in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”), and other applicable laws.

This Privacy Policy is intended to support Efficient Group’s transparency obligations under POPIA. Certain processing activities may also be governed by product-specific notices, contractual terms, or other applicable legal and regulatory requirements. Where additional notices apply, they should be read together with this notice.

You are not obliged to provide personal information to us unless it is necessary for us to comply with a legal obligation or to provide a product or service to you. Where the provision of personal information is mandatory, we will inform you of the relevant consequences if you do not provide it. Where we collect personal information from a source other than you, we will take reasonably practicable steps to inform you of the source of that information, as required by applicable law.

## 2 SCOPE OF THIS NOTICE

This notice applies to personal information we process about you in the course of our relationship with you, including when you:

- + browse or use our website;
- + submit enquiries to us;
- + apply for or use our products and services;
- + attend meetings or events with us;

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- + communicate with us; or
- + visit our business premises.

*\*Separate notices may apply to specific products, services, campaigns, or platforms.*

This privacy notice should, where appropriate, be read together with any other documents or agreements between you and us that describe how we collect or process personal information in specific circumstances.

To the extent of any inconsistency between this privacy notice and any other document, this privacy notice will prevail in relation to the processing of personal information, unless expressly stated otherwise.

### 3 INFORMATION WE COLLECT

We may process various types of personal information about you, as follows:

- + **Identity information**, which includes information concerning your name, username or similar identifier, marital status, title, occupation, interests, date of birth, gender, and legal status, as well as copies of your identity documents, photographs, identity number, registration number, and your qualifications.
- + **Contact information**, which includes your billing addresses, delivery addresses, e-mail addresses, telephone numbers, and identification or passport number.
- + **Financial information**, which includes source of funds, bank account details, details of funds which we invest and hold on your behalf for a matter, insurance information, financial statements, tax clearance certificates, and VAT registration numbers.
- + **Transaction information**, which includes details about payments made to or received from you and company information, which may consist of financial activity.
- + **Technical information**, which includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website, to use our products and services, or to engage with us.
- + **Usage information**, which includes information as to your access to and use of the website, products and services, such as what links you went to, what content you accessed, the amount of content viewed and the order of that content, as well as the

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amount of time spent on the specific content and what products and services you access and use when engaging with the Efficient Group.

- + **Location information**, which includes geographical information from your access device (which is usually based on the GPS or IP location).
- + **CCTV footage**, which may include video images of you and your vehicle captured when you visit our physical business premises (where signage is displayed), for the purposes of safety, security, access control, and incident investigation.
- + **Marketing and communications information**, which includes your preferences in respect of receiving marketing information from us and our third parties, and your communication preferences.
- + **Special personal information**: Depending on your interactions with us and which of our products or services you use, we may process special personal information only where we are permitted by POPIA and other applicable laws. Special personal information includes, but is not limited to:
  - + **race or ethnic origin**, for example, where required for lawful reporting, inclusion monitoring, or other permitted purposes;
  - + **health or medical information**, if relevant, for example, to accommodate access needs or where required by law;
  - + **biometric information**, if used for identity verification or access control, where permitted;
  - + **criminal behaviour**, including allegations or proceedings, where required for compliance, risk management, or to meet legal obligations; and
  - + **information about children**, where a competent person provides consent, or where we are permitted or required by law.

Where we process **special personal information**:

- + We do so only on a lawful basis recognised by POPIA; for example:
  - + where you have given explicit consent;
  - + where processing is necessary to establish, exercise, or defend a right or obligation in law;
  - + where it is required or authorised by law; or
  - + where another POPIA exception applies.

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- + We apply additional safeguards appropriate to the sensitivity of the information, including data minimisation, restricted access, and enhanced security controls.

We may create, use, and retain de-identified information (including historical or statistical data) for purposes such as analytics, improving our services, research, and developing know-how. We will only collect personal information that is adequate, relevant, and not excessive in relation to the purpose for which it is processed.

- + De-identified information may be derived from your personal information but is not regarded as personal information where it cannot reasonably be used to identify you, directly or indirectly.
- + If we link de-identified information with personal information in a way that identifies (or could reasonably identify) you, we will treat the combined information as personal information and handle it in accordance with this privacy notice.

#### 4 HOW WE COLLECT PERSONAL INFORMATION

We collect personal information in the following ways:

- + **Directly from you**, in the process of providing financial services, when you complete forms, submit enquiries, request information, subscribe to updates, or otherwise contact us.
- + **Automatically**, when you use the website (for example through cookies, server logs, and similar technologies that collect device and usage information).
- + **From third parties**, where lawful and necessary (for example, IT and security providers, website-hosting providers, analytics providers, and public sources or regulators where permitted).
- + **Through CCTV at our premises**, when you visit our physical business premises that are monitored by CCTV (where appropriate signage is displayed).

#### 5 PURPOSES FOR PROCESSING AND LAWFUL BASIS

We process personal information only where we are permitted under POPIA and other applicable laws. Depending on the context, our processing may be based on:

- your **consent**;
- performance of a contract** with you or steps taken at your request;
- our **legal obligations**; or

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- d. our **legitimate interests** (for example, operating our business, preventing fraud, and securing our systems), provided those interests are not overridden by your rights.

We will use your personal information for the following purposes:

- + **Provide products and services**, including onboarding, administration, support, and the processing of instructions, transactions, complaints, or claims handling.
- + **Verify identity and conduct compliance checks**, including where required for prevention of money laundering, fraud prevention, and other regulatory obligations (where applicable).
- + **Respond to enquiries** and communicate with you (including the sending of service or operational messages).
- + **Operate and improve our channels**, including our website, systems, and communications, through testing, analytics, troubleshooting, and maintenance.
- + **Security and safety**, including monitoring and investigating suspicious activity, managing access control, and using CCTV for safety, security, and incident investigation.
- + **Marketing** our products and services, where permitted and subject to your choices.
- + **Legal and business purposes**, including complying with law, responding to lawful requests, enforcing our rights, managing disputes, keeping records, and for audit, risk, and governance.

## 6 COOKIES AND ANALYTICS

We use cookies and similar technologies (such as pixels and local storage) to operate the website, remember your preferences, understand how the website is used, and help keep it secure. Some cookies are necessary for the website to function, while other cookies are optional and may be used for analytics and (where applicable) marketing. You can manage cookies through your browser settings and, where implemented, our cookie banner or consent tool. Where required, we will request your consent before placing optional cookies. Disabling certain cookies may affect website functionality. Where required by law, non-essential cookies will not be placed on your device without your prior consent.

## 7 HOW WE SHARE PERSONAL INFORMATION

We may share personal information with:

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- + our group of companies where necessary for internal administration and to provide products and services;
- + service providers and operators who support us (for example, website hosting, e-mail delivery, website analytics, security monitoring, IT support), under appropriate contractual safeguards;
- + professional advisors (for example, auditors or legal counsel), where necessary;
- + regulators and authorities where required or permitted by law; and
- + third parties in connection with a business transaction (for example, a restructuring, merger, or sale), subject to appropriate protections.

## 8 CROSS-BORDER TRANSFERS

Some of our operators/service providers may process personal information outside South Africa (for example, where our hosting, cloud, or security providers are located abroad). Where we transfer personal information across borders, we do so in accordance with POPIA section 72 by ensuring that, as applicable, (a) the recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection, (b) the transfer is necessary for the performance of a contract or for your benefit, (c) you consent to the transfer, or (d) another section 72 basis applies.

## 9 RETENTION

We keep personal information only for as long as is necessary for the purposes described in this notice, unless a longer retention period is required or permitted by law (for example, to meet tax, audit, or regulatory requirements) or to establish, exercise, or defend legal claims. Retention periods are determined with reference to applicable legal, regulatory, tax, and operational requirements, as well as the purpose for which the information was collected. When no longer needed, we securely delete, destroy, or de-identify the information. CCTV footage is typically retained for a limited period in line with our security and operational requirements (for example, days or weeks rather than months), unless it is required for an investigation, incident, or legal proceedings, or to comply with law.

## 10 INFORMATION SECURITY

We use appropriate technical and organisational measures designed to protect personal information against loss, damage, unauthorised access, or unlawful processing. However,

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no online service is completely secure; please use the website responsibly and notify us if you suspect any security incident involving your personal information.

**Security incidents:** If we become aware of unauthorised access to personal information (or a reasonable belief that this has occurred), we will take steps to contain and assess the incident and, where required by POPIA, notify affected data subjects and the Information Regulator as soon as reasonably possible, including information about the nature of the compromise and recommended steps to reduce potential harm. You are responsible for maintaining the confidentiality of any login credentials and for notifying us immediately of any unauthorised use of your account or personal information.

## 11 MARKETING AND YOUR CHOICES

Where we send direct marketing, we will do so in line with POPIA (including section 69) and applicable electronic communications laws. Where required, we will obtain your consent before sending you direct marketing. You can opt out of marketing communications at any time by using the unsubscribe link in our messages. Opting out will not affect mandatory financial service or operational messages.

## 12 CHILDREN

Our products, services, and channels are generally not directed at children. We do not knowingly collect personal information from children without appropriate authorisation. If, in limited circumstances, we need to process a child’s personal information (for example, where a parent/guardian requests a service), we will do so only with the consent of a competent person or where we are permitted or required by law. If you believe a child has provided personal information to us without appropriate authorisation, please contact us so we can take appropriate steps.

## 13 YOUR POPIA RIGHTS

Subject to POPIA and any applicable exemptions, you may have the right to:

- a. request confirmation that we hold personal information about you;
- b. request access to your personal information (including a description of the personal information we hold and information about how it is processed), where applicable;
- c. request correction, update, deletion, destruction, or de-identification of your personal information, where appropriate;

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- d. object to the processing of your personal information in certain circumstances (including, where applicable, direct marketing);
- e. withdraw consent where processing is based on consent, where applicable, and lodge a complaint with us and/or the Information Regulator.

We may need to verify your identity before processing a rights request and may ask for additional information to help us understand and respond to your request.

**How to make a request: To exercise your POPIA rights, please** complete the prescribed forms contained in the Efficient Group’s PAIA Manual (available on the Efficient Group [website](#)) and send it to the Information Officer at [info@efgroup.co.za](mailto:info@efgroup.co.za). Requests will be processed in accordance with POPIA and any other applicable legislation and we will respond to your request as soon as reasonably possible but not later than 30 (thirty) days of receipt. You may also submit requests via any Efficient Group communication channel published on the website. Requests for confirmation of whether personal information is held, objections to processing (where applicable), and requests for correction, deletion, destruction, or de-identification of personal information will be handled free of charge. A request for access to a record of personal information may be subject to the fees set out in the PAIA Manual.

#### 14 CONTACT US AND COMPLAINTS

Should you feel that your rights in respect of your personal information have been infringed, please address your concerns to the Information Officer at [complaints@efgroup.co.za](mailto:complaints@efgroup.co.za) or [info@efgroup.co.za](mailto:info@efgroup.co.za). You may use other communication channels made available by the Efficient Group to lodge a complaint, provided the complaint is submitted in writing. If you are unable to submit a complaint in writing, we will provide reasonable assistance to enable you to submit the complaint in writing.

If you feel that the attempts by Efficient Group to resolve the matter have been inadequate, you may lodge a complaint with the South African **Information Regulator**:

<p><b>E-mail:</b> <a href="mailto:POPIAComplaints@infoeregulator.org.za">POPIAComplaints@infoeregulator.org.za</a></p> <p><b>Physical address:</b></p>	<p><b>Website:</b> <a href="https://infoeregulator.org.za/complaints">https://infoeregulator.org.za/complaints</a></p> <p><b>Tel:</b> +27 100235200</p>
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Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg	
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Any queries that you have relating to the handling of your personal information should be directed to the Information Officer and sent to [info@efgroup.co.za](mailto:info@efgroup.co.za) or by completing the “Contact Us Enquiry form” and choosing “Personal Information Handling” as specific interest.

## 15 UPDATES TO THIS NOTICE

We may update this privacy notice from time to time. The latest version will be made available through our usual channels (including on our website, where applicable) and will apply from the “Last updated” date shown above.

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