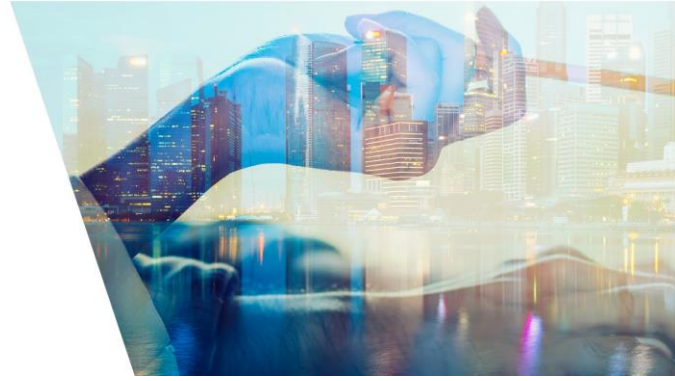


Efficient Financial Services (Pty) Ltd

PP | Effective Date: 1 May 2021 | Version 2 | Reviewed on: 17 Nov 2021

PRIVACY POLICY



1. INTRODUCTION AND OBJECTIVE

Efficient Wealth takes your privacy and the protection of your personal information seriously, and will only use your personal information in accordance with this policy and applicable laws. This policy outlines how your personal information will be used by Efficient Wealth and applies to personal and special personal information that you provide to us, or which we may collect from third parties. It is important that you read this policy carefully before submitting any personal information to us. By submitting any personal information to Efficient Wealth, you provide consent to the processing of your personal information and/or that of your child/children or any child, that you have legal guardianship over (if applicable) as outlined in this policy. Please do not submit any personal information to Efficient Wealth 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 Wealth may not be able to provide its products and/or services to you.

2. DEFINITIONS

applicable laws	Means all legislation that Efficient Wealth must adhere to and includes, but is not limited to, the Protection of Personal Information Act No 4 of 2013 (POPIA), the Financial Intelligence Centre Act No 38 of 2001 (FICA), the Financial Advisory and Intermediary Services Act No 37 of 2002 (FAIS), the Companies Act No 71 of 2008 (Companies Act) and the Promotion of Access to Information Act No 2 of 2000 (PAIA).
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, registration number 2006/036947/07 and its subsidiaries as defined in the Companies Act No 71 of 2008.
personal information	Means information relating to you that includes, but not limited to: <ul style="list-style-type: none"> a. , national, ethnic or social origin, colour, sexual orientation, age,

<p>personal information</p>	<ul style="list-style-type: none"> b. , national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth; c. information relating to education or the medical, financial, criminal or employment history; d. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to you; e. biometric information; f. personal opinions, views or preferences; g. 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; 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.
<p>processing</p>	<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. disseminating by means of transmission, distribution or making available in any other form; or c. merging, linking, restricting, degrading, erasing or destroying information.
<p>screening</p>	<p>Means screening individuals, groups or companies against third party software to identify, detect, prevent and manage compliance risks.</p>
<p>special personal information</p>	<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 Wealth	Means Efficient Financial Services (Pty) Ltd, a registered financial services provider (FSP No 655) and a subsidiary of Efficient Group (Pty) Ltd.
you/your	Means any prospective, new or existing client, supplier, employee or prospective employee, service provider or other stakeholder of Efficient Wealth.

3. TYPES OF PERSONAL INFORMATION THAT WE COLLECT

- 3.1 We may collect the following personal information about you:
- 3.1.1 your name, addresses, contact details, date of birth, place of birth, identity number, passport number, bank details, gender, information about your beneficiary, your employment, tax number, marital status, pregnancy, and your 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;
 - 3.1.4 details of contracts you enter into with us and carry out with us;
 - 3.1.5 details of you made available on third-party sanctions lists; and/or
 - 3.1.6 special categories of personal information, that includes race, health, and biometric information, such as photos, fingerprints, and/or voiceprints.

4. HOW WE COLLECT 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), by completing an application form for our products or services, or when requesting further information about our products or services, 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, any regulator or other third party that may hold such information.

5. USE OF PERSONAL INFORMATION COLLECTED

- 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/or terrorist financing risk in the interest of security and crime prevention;
 - 5.1.4 assessing and resolving complaints;
 - 5.1.5 operational, marketing, auditing, legal and record-keeping requirements;
 - 5.1.6 verifying your identity; and/or
 - 5.1.7 verifying the identities of beneficial owners of entities (where relevant).

5.2 We may, from time to time, contact you about products and/or services available from Efficient Wealth and subsidiaries of Efficient Group which we believe may be of interest to you, by email, phone, text messages 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 other Efficient Group subsidiaries, financial advisors marketing and selling our products and solutions, and selected third parties who process the information on behalf.

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

6.2.1 to any other of Efficient Group's subsidiaries, business partners, shareholders or other third party to:

- i. assess and monitor any of your applications for Efficient Group products and/or services;
- ii. 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
- iii. have a better understanding of your circumstances and needs to provide and improve our products and services to you.

6.2.2 to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;

6.2.3 to any regulator or supervisory authority, including those in foreign jurisdictions, if Efficient Wealth is required to do so in terms of applicable laws;

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

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

6.2.6 to your financial advisor, his/her assistants and other employees who have a need to know for the purposes of providing our products or services to you, or any other person acting on your behalf.

6.3 We may transfer your personal information to another of Efficient Group's subsidiaries, an agent, sub-contractor or third parties who conduct business in another country, including countries which may not have data privacy laws 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 laws, 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 PERSONAL INFORMATION

- 8.1 You may request the details around the personal information which we hold about you under the PAIA. Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA and is included in our PAIA manual.
- 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 Efficient Wealth, please follow the procedure set out in our PAIA manual.
- 8.3 You have a right to request the correction of personal information that we hold about you.
- 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, Efficient Wealth may limit the products and/or services offered to you or elect not to proceed with the business relationship.
- 8.5 You have a right in certain circumstances to request the destruction or deletion of personal information and, where applicable, to place a restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details below.
- 8.6 You have a right to object on reasonable grounds, to the processing of your personal information unless applicable laws provide for such processing.

9. INDEMNITY

You hereby indemnify and hold Efficient Wealth harmless from any loss, damages, or injury that you may incur as a result of:

- 9.1 the lawful processing of your personal information;
- 9.2 any unintentional processing of your personal information and
- 9.3 or the provision of incorrect or incomplete personal information to Efficient Wealth.

10. AMENDMENT

- 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 laws;
 - 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
 - 10.1.5 for any other reason which Efficient Wealth, in its sole discretion, deem reasonable or necessary.
- 10.2 Any such amendment will come into effect and become part of any agreement you have with Efficient Wealth when notice is given to you of the change by publication on our website ([\[LINK TO WEBSITE\]](#)). It is your responsibility to check the website frequently.

11. COMPLAINTS

Should you believe that Efficient Wealth has utilised your personal information contrary to applicable laws, you undertake to first attempt to resolve any concerns with Efficient Wealth. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Email: POPIAComplaints@inforegulator.org.za

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

12. CONTACT US

If you have any comments or queries about this policy, please contact our Information Officer, Rudi Barnard at rudi@efw.co.za, or our Deputy Information Officer, Britta Weidhase at britta@efw.co.za.