


**Policy and Procedure Manual**

LC08

Effective Date: 1 December 2010

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**CLIENT PRIVACY POLICY**

## 8 CLIENT PRIVACY POLICY

### 8.1 Scope:

This policy applies to all staff of EFFICIENT GROUP and its subsidiaries.

### 8.2 Purpose:

The aim of this policy is to maintain the privacy of our clients' personal and private information ("client information") submitted to EFFICIENT GROUP or its subsidiaries including information submitted via the Efficient Advise website (<http://www.efadvise.co.za>) or obtainable from the Efficient Select IFA Portal or website. This privacy and security policy outlines our practices and commitment to our clients in this regard.

In addition, this policy facilitates adherence to industry standards and regulations in terms of client privacy, in order to ensure that our clients' best interests remain top priority.

### 8.3 Our commitment to our client

#### 8.3.1 EFFICIENT GROUP and its subsidiaries are not permitted to sell or provide personal client information to third parties for independent use.

Information obtainable from the Efficient Select IFA Portal will at all times be password protected, and will only be available to the financial advisor as per the client's instruction to us.

The only instances in which EFFICIENT GROUP and its employees will be permitted to disclose client information is when it is:

#### a. Authorised by the client

Client information will not be collected or used without obtaining the client's consent. In respect of marketing of services or products, consent to collect or use information can be expressed (for example signing an agreement) or implied (e.g. if the client is given an opportunity to opt out of a specific form of information sharing, but chooses not to do so, it implies that the client chooses to share this information). The type of client information the client will be asked to provide will vary according to the product or services required.

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**b. Required by law**

This most often relates to government tax reporting requirements or in terms of a court order or if required in terms of legislation or in accordance with the common law. Employees will, however, in all instances required by law, only disclose the information specifically requested.

**c. Necessary to protect EFFICIENT GROUP' interest**

This reason will hold provided that it is not used as an excuse for disclosing information about a client (including name and address) to anyone else, including other companies in the group for marketing purposes.

**d. In the public interest**

Occasionally EFFICIENT GROUP is asked to disclose client information for matters of public interest, e.g. to assist in the prevention of crimes. Before complying with these requests, EFFICIENT GROUP and its subsidiaries will take every precaution to ensure the authorities involved have legitimate grounds to make such a request.

**8.3.2 Protecting client information**

**a. Client Information**

Client information refers to personal and private information submitted to EFFICIENT GROUP, its subsidiaries and employees via the website or by any other means that identifies or relates to a client, whether the client is an individual or a business. This information includes details such as name, age, ID number, registration number, address and other contact details, and financial information.

**b. Reasons for collecting such information**

Client information is used to identify the client and to improve the level of our service delivery to our clients. Client information is also necessary to enable us to contact the client in the event of any query. We may use client information to bring details of EFFICIENT GROUP' other services and products to the client's attention. Financial information will be required by our financial advisers in order to create financial plans that will best fit our client's individual requirements and risk appetite.

**c. How we safeguard client information**

Keeping your financial information secure is one of our most important responsibilities. This policy governs the behaviour of employees with regard to accuracy, confidentiality and security of all client information.

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### 8.3.3 Communication

EFFICIENT GROUP will use client information to send our clients information on new services or products that may be of interest to the client and from time to time may mail, e-mail or SMS information to the client about our products and services or on the EFFICIENT GROUP subsidiaries and its products or services.

The client will have the option to indicate that he/she does not want to receive such specific product communications in future, at time of receipt of the communication.

The client will, however, continue to receive other product information until the option to not receive future communications has again been selected for such specific product.

Client information, as submitted by clients, will also be used in order for us to send our clients their quarterly investment reports.

### 8.3.4 Third parties

Except as outlined in the section dealing with "Sharing Client Information", EFFICIENT GROUP, its subsidiaries, and employees will never sell or otherwise make available client information to other organisations or parties including subsidiaries of EFFICIENT GROUP.

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