



CCD COURIERS (PTY) LTD

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PRIVACY NOTICE

PREPARED IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

INTRODUCTION AND PURPOSE OF NOTICE

To comply with the Protection of Personal Information Act 4 of 2013 ("POPIA") and all related data privacy laws, CCD Couriers (Pty) Ltd (the "Company") processes Personal Information under contractual obligations with its institutional clients, such as banks and mobile service providers. The Company does not provide services directly to the public but delivers and collects items (e.g., bank cards, mobile phones, SIM cards, routers, and payment devices) on behalf of these institutions.

Where necessary, the Company may contact customers by telephone to confirm delivery addresses, obtain information for delivery to an authorised third party, or facilitate collection arrangements. Additionally, customers may provide information through the "Self-Help" application.

This Privacy Notice describes how we process your Personal Information, including its receipt, collection, use, disclosure, retention, and protection.

LEGAL BASIS FOR PROCESSING

The Company processes Personal Information based on the following:

- Contractual necessity: To fulfil service agreements with our institutional clients.
- Legal obligations: Where required under applicable laws, such as the Financial Intelligence Centre Act (FICA) and the Regulation of Interception of Communications Act (RICA).
- Legitimate interest: Ensuring security, preventing fraud, and enhancing operational efficiency.

WHAT PERSONAL INFORMATION WE COLLECT

The Company may process the following Personal Information to facilitate deliveries and collections:

- Name and surname
- Contact details (address, email, phone number)
- Identity number, passport number, or business registration number
- Identification document (ID, driver's license, or passport) for verification purposes
- Address confirmation documents (utility bills, bank statements, lease agreements, etc.)
- Location information (for delivery tracking and verification)
- Information provided via telephone calls or the "Self-Help" application
- Details of authorised third parties designated to receive parcels on a customer's behalf

HOW WE COLLECT INFORMATION - GENERAL

Personal Information is received through:

- Institutional clients (e.g., banks, mobile service providers) under service agreements
- Direct customer interactions via telephone calls for delivery or collection arrangements
- Customer input via the “Self-Help” application
- Verification and fraud prevention measures as required by institutional clients
- Point of delivery or collection interactions

HOW WE COLLECT INFORMATION – AT THE POINT OF DELIVERY OR COLLECTION (COURIER DEVICE)

The Company, as a specialist in the outsourced function of collecting customer verification documents known as “KYC” (Know Your Customer) or “CDD” (Customer Due Diligence), carries out this service on behalf of its clients, who are institutions or companies with which the customer interacts. At the point of delivery or collection, a company courier uses a mobile telephone (cell phone) equipped with a specialised and proprietary application to capture high-quality photographs of the customer’s identification and proof of residence documents. These images are reviewed by the courier to ensure they are legible and of high quality before being securely transmitted via encrypted processes to the Company’s servers. After submission, the courier no longer has access to these photographs. The devices used for this process are tracked, and their information is both encrypted and monitored by the Company. All of these processes, practices, and encryption standards are approved by the customer’s institution, which has requested the delivery or collection service and is responsible for auditing these practices to ensure compliance.

USE OF PERSONAL INFORMATION

The Company processes Personal Information for the following purposes:

- Scheduling deliveries and collections
- Verifying identity and address details where required by law or client policies
- Contacting customers to confirm delivery details or authorised third-party recipients
- Fraud prevention and security purposes
- Maintaining records in compliance with regulatory requirements

SHARING OF PERSONAL INFORMATION

Personal Information may be shared with:

- Institutional clients that provided the data (e.g., banks, telecoms)
- Couriers and operational staff responsible for deliveries and collections
- Law enforcement or regulatory bodies where legally required
- Secure service providers for system maintenance and fraud prevention

The Company does not transfer Personal Information outside South Africa unless required under contractual agreements with institutional clients, and such transfers comply with applicable data protection laws.

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CUSTOMER RIGHTS AND REQUESTS

Since the Company processes Personal Information on behalf of institutional clients, data subjects should direct requests for access, correction, or deletion of their data to their service provider (e.g., the bank or telecom provider). Where appropriate, the Company will facilitate such requests under client instructions.

SECURITY AND DATA RETENTION

We implement industry-standard security measures to protect Personal Information. Retention periods are determined based on contractual obligations, legal requirements, and business needs. Once data is no longer required, it is securely deleted or anonymised.

CONTACT INFORMATION AND COMPLAINTS

For inquiries regarding this Privacy Notice or data processing practices, please contact:

Information Officer	Mandla Mthethwa
Deputy Information Officer	Martin Verwey
Email	legal@ccdcouriers.co.za
Phone	011 799 5000
Address	P.O. Box 1213, Magalies View, 2067

If you are dissatisfied with how your Personal Information is handled, you may contact the South African Information Regulator: <https://www.justice.gov.za/infoereg/>.

UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice may be updated periodically to reflect changes in legal requirements or business operations. Customers are encouraged to review this document regularly for any updates.

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