



Coca-Cola

Beverages
Africa

Privacy Notice

March 2023



Coca-Cola Beverages Africa Proprietary Limited (“CCBA”) is committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully and transparently in compliance with applicable data protection laws.

This Privacy Notice (“Notice”) explains how we obtain, process and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who we are
- What personal information we collect
- How we use your personal information
- To whom we may disclose your personal information to
- How we safeguard your personal information
- Your rights in relation to your personal information
- Changes to this Notice
- How to contact us

Who we are

CCBA is the 8th largest Coca-Cola bottling partner worldwide and the biggest on the African continent. CCBA serves 15 countries in Africa including: The Republic of South Africa, the Kingdom of Eswatini, the Kingdom of Lesotho, the Republic of Ghana, the Republic of Kenya, the Federal Democratic Republic of Ethiopia, the Republic of Mozambique, the United Republic of Tanzania, the Republic of Uganda, the Republic of Namibia, the Department of Mayotte, the Union of the Comoros, the Republic of Botswana, the Republic of Zambia and the Republic of Malawi.

CCBA is a South African company with its registered address at Waterfront Business Park, Building 7, Pommern Street, Humerail, Gqeberha, 6001.

In this Notice, reference to CCBA shall include Coca-Cola Beverages Africa (Pty) Ltd, its affiliates, controlled subsidiaries and entities in which it either owns a majority interest or manages operations.

For the purposes of applicable data protection laws, CCBA shall be a “responsible party” in respect of your personal information. This means that CCBA is responsible for deciding how it holds and uses your personal information. This includes ensuring that CCBA uses your personal information in compliance with applicable data protection laws and in accordance with CCBA’s data protection policies, as amended from time to time.

What personal information we collect

For the purposes of this Notices, “personal information” includes any information relating to an identifiable, living, natural person or an identifiable, existing juristic person. In essence, this is any information or data that can be used to identify you or that CCBA can link to you and which information CCBA has in its possession and/or under its control. It does not include data where the identifiable information has been removed or anonymised.

There are also certain types of more sensitive personal information, referred to as “special personal information” or “sensitive personal information”, which requires a higher level of protection. Special or sensitive personal information includes, but is not limited to, information about a person’s health, sexual orientation or criminal convictions.



We will collect and process the following personal information:

- *Contact details*: such as name, address, phone number, email address, country of residence, emergency contact details, as well as professional contact details such as company and job title;
- *Correspondence*: such as the content, date and time of emails, chats, social media messages and other communications with you;
- *Login credentials*: such as your username and (hashed) password, recovery email address, secret questions, and security logs;
- *Payment information*: such as your (company) bank account number, invoices and other information necessary to make or receive payments;
- *Personal characteristics*: such as age, gender, date of birth, place of birth, civil status and nationality.
- *Preferences*: such as your personal preferences for our products and services, lifestyle and social circumstances, family circumstances (for example, your marital status and dependents), languages and marketing preferences;
- *Customer and vendor classification information*: such as unique categories defined by the size, sector, geographical location and other parameters;
- *Transaction information*: such as your purchases, customer account information, order and contract information, delivery details, billing and financial data, creditworthiness and transaction history;
- *User-generated content*: such as your postings on any blogs, forums, wikis and any other social media applications and services that we provide;
- *Public information*: including information that is available on the Internet, such as social media information, public records and news reports;
- *Vendor screening information*: such as professional qualifications, licenses and certificates, work permits, government identification documents, potential conflicts of interest, and ultimate beneficial ownership, each as permitted or required by applicable law;
- *Referral and business leads*: such as contact details about referrals and business leads received from business partners;
- *Stakeholder data*: such as information about public authority figures and other stakeholders collected from agencies or public sources;
- *Website and service usage information*: such as the host name and IP address of your device, your browser type and version, your operating system, the pages you visit, the time and duration of your visit and the website that referred you to us;
- *Cookies*: small data files that are placed on your computer or mobile device when you visit a website or use an online service. We may use cookies and similar technologies on our websites and other services. For more information about our use of cookies, please see our Cookie Policy; or
- *Video footage*: such as information captured on security systems, including closed circuit television (“CCTV”).

How we use your personal information

Personal information may be processed by CCBA for the following reasons:

- Providing products and services as requested by customers and consumers, including product and service delivery, customer service and support, account and billing management, and to provide other related services;
- Managing our ongoing relationship with you, including managing contractual or other obligations, interacting and communicating with you about our products or services, as well as special offers and promotions;
- Allowing you to register and participate in promotions, special offers, loyalty programs, prize draws etc.;



- Data analytics to derive trends and to improve our products and services;
- Concluding contracts and business transactions;
- Confirming, verifying and updating your details;
- Managing our workforce, including providing benefits and entitlements (such as compensation and benefits) to personnel;
- Complying with employment and labour laws, regulations and requirements;
- Communicating with you, including personnel, business partners, consumers and customers;
- Screening and evaluating prospective personnel, vendors and business partners to ensure their compliance with applicable legal requirements, industry standards and our policies;
- Protecting the rights and freedoms of CCBA, its customers, consumers, business partners, and personnel;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- Processing operations in the context of mergers, acquisitions and other corporate operations;
- Complying with legal requirements;
- Protecting and enhancing the security and safety of CCBA and individuals including customers, consumers, business partners and personnel; or
- Processing carried out in the context of the use of cookies and other similar technologies.

Under applicable data protection laws , CCBA may only use your personal information in the following ways:

- *Consent*: when required, we may process your personal information by obtaining your consent. You can withdraw your consent at any time by contacting us (see our contact information below);
- *Contractual necessity*: we may need to process your personal information in order to enter into a contract with you or to perform our obligations under a contract with you;
- *Legitimate interest*: we may process your personal information for your or our legitimate interest/s;
- *Legal obligation*: we may process your personal information as necessary for compliance with a legal obligation arising under applicable law to which CCBA is subject; or
- *Public and vital interest*: we may process your personal information where it is necessary in order to protect your vital interests or for the performance of a task carried out in the public's interest.

We will only use your personal information for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is lawful and compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, or if required, seek your consent.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules, where required or permitted by law.

To whom we may disclose your personal information to

CCBA may share your personal information with:

- Other members of the CCBA group of companies;
- Third parties contracted or mandated by CCBA, including service providers, contractors or agents, for the purposes listed above, for example sales and distribution partners, credit reference and fraud prevention agencies and outlet surveyors;
- Relevant authorities, to the extent required by law, regulation or court order, for example CCBA is under a duty to disclose personal information in order to comply with certain legal or regulatory obligations;
- Acquirers, successors, or assignees of CCBA as part of any merger, acquisition, debt financing, sale of assets, or similar transaction; and



- Advisors and legal counsel in order to establish, exercise or defend CCBA's rights, for example if CCBA needs to obtain external legal advice or provide personal information in connection with judicial proceedings.

Where personal information is disclosed to third parties, we will take steps to ensure that such personal information is accessed only by those persons who need to do so for the purposes described in this Notice and that appropriate security measures are in place to protect your personal information in line with applicable data protection laws and our policies.

We do not allow our third party service providers, contractors or agents to use your personal information for their own purposes; we only permit them to process your personal information for specified purposes and strictly in accordance with our instructions.

How we safeguard your personal information

We will take appropriate technical and organisational security and other measures to ensure that the integrity of the personal information in our possession, or under our control, is secure and protected against unauthorised or unlawful access, use, acquisition, disclosure, interference, modification, accidental loss, destruction, disclosure or damage. We will, on an ongoing basis, continue to review our controls and related processes to ensure that your personal information is secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that the personal information we are responsible for is kept secure.

We may transfer your personal information to another country for processing or storage. We will ensure that personal information transferred internationally is done so in accordance with applicable data protection laws and / or under appropriate agreements which safeguard the integrity of your personal information.

Your rights in relation to your personal information

You have a number of legal rights in relation to the personal information that we hold about you.

These rights include:

- The right to be informed and provided with clear, transparent and easily understandable information about how we use your personal information and your rights in respect thereof. Please note that this Notice constitutes such information;
- The right to access the personal information that we hold about you. Please note that any such access request may be subject to a payment of a legally allowable fee and we will let you know what it is at the time of your request;
- The right to request that we rectify any of your personal information that we process in accordance with this Notice. The personal information that you may request us to rectify includes personal information that is inaccurate, irrelevant, excessive, out of date, incomplete or misleading, or which was obtained unlawfully or that we are no longer authorised to retain;
- The right to request that we destroy or delete any of your personal information that we have processed in accordance with this Notice. Please note that there may be circumstances where you ask us to erase your personal information, but CCBA is legally entitled or obliged to retain such information and we are therefore entitled to refuse your request;
- The right to object on reasonable grounds, and the right to request that we restrict our processing of your personal information relating to your particular situation, unless the processing is required by law. Again, there



may be circumstances where you object to, or ask us to restrict our processing of your personal information, but CCBA is legally entitled or obliged to continue processing your personal information and is therefore entitled to refuse your request. However, you may raise an objection if you are of the view that the processing of your personal information is not necessary to pursue your or our legitimate interests;

- The right to receive your personal information held by CCBA, in an organized, commonly used machine-readable format;
- The right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you; and
- The right to lodge a complaint with the relevant data protection authority if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting CCBA in writing, using the contact information set out below. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information, or to exercise your rights.

Changes to this Notice

Please note that we may amend this Notice from time to time. Please check our website periodically to inform yourself of any changes.

How to contact us

If you would like further information regarding this Notice, please address your questions, comments and/or requests to privacyoffice@ccbagroup.com for the attention of the Information Officer, who is responsible for overseeing compliance with this Notice.