



Coca-Cola

Beverages
Africa

Privacy Notice

August 2021



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 the Protection of Personal Information Act No. 4 of 2013 (“Act”).

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
- How we safeguard your personal information
- Your rights in relation to personal information
- Changes to this Notice
- How to contact us

Who we are

CCBA is the eighth largest Coca-Cola bottling partner worldwide and the biggest on the African continent. CCBA serves 14 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 and the Republic of Zambia.

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

In this Notice, reference to CCBA shall include the following South African registered entities listed below:

- Coca-Cola Beverages South Africa (Pty) Ltd (Registration Number 2015/027638/07);
- Appletiser South Africa (Pty) Ltd (Registration Number 1956/002074/07); and
- Coca-Cola Sabco (Pty) Ltd (Registration Number 1995/010764/07).

For the purposes of South African data protection legislation (which is, in the main, the Act), CCBA is 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 legislation in South Africa and in accordance with CCBA’s data protection policies, as amended from time to time.

What personal information we collect

“Personal information” includes 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 CCBA has in its possession and/or under its control. It does not include data where the identity has been removed (de-identified data).



There are also certain types of more sensitive personal information, referred to as “special personal information” in the Act, which requires a higher level of protection, such as information about a person’s health, sexual orientation or criminal convictions.

We will collect and process the following personal information:

- Information that you or someone acting on your behalf provides to us. This includes information about you that is given to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise.
- Information that we collect or generate about you. We will also collect information about you when you purchase our products or when we otherwise interact or correspond with you.
- If you are a customer, this information may include:
 - Information about you, your transactions, financial information and relationship to others;
 - Data that we collect about your use of CCBA’s IT systems;
 - Information for tax reporting (e.g. VAT);
 - Information which is required for us to comply with our legal or regulatory obligations;
 - Recordings of telephone calls between you and us – if we have a specific legal basis or are legally required to record telephone conversations; and
 - Information which we obtain from other sources: if we collect or receive your personal information in the context of the sale of products, we might receive information from third parties, other parties relevant to the products we are providing and others such as regulators and/or other authorities. This information could include your name, contact details, and other information relevant to the products that we are selling to our customers.
- CCBA uses various technologies to collect and store information when you visit the CCBA website. We may, for example, collect information about the type of device you use to access our website, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on the website, the web pages and the search terms you enter in our website. For information about how CCBA uses Cookies and the choices you may have, you can access CCBA’s Cookies Policy on our website, www.ccbagroup.com.
- 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:

- To perform a contractual obligation in terms of a contract we have in place with you or a third-party to whom you are connected (including performing our obligations and exercising our rights);
- To provide products and services as requested by customers and consumers, including sending of marketing communications;
- To allow you to register and participate in promotions, special offers, loyalty programs, prize draws etc.;
- To perform data analytics to derive trends and improve CCBA’s products and services;
- To concluding contracts and business transactions;
- To confirming, verifying and updating your details;
- To communicate with you in connection with your relationship with us and the products we provide to you;
- To notify you about any changes to our products and/or services;
- To conduct reference checks and/or conduct credit reference searches or verifications;
- To protecting safety, security, rights and freedoms of CCBA, its customers, consumers, business partners, and personnel;
- To detect and prevent fraud, crime, money laundering or other malpractice;



- To comply with legal requirements;
- To carry out processing in the context of the use of cookies and similar technologies;
- To investigate any complaints or queries you or a third-party to whom you are connected may have.

CCBA is entitled to use personal information in these ways because:

- Consent – we may process your personal information by obtaining your consent, when required. You can withdraw your consent by contacting us (see our contact information below);
- Contract – we may need to process your personal information 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;
- Compliance with law – we may process your personal information as is necessary for compliance with a legal obligation arising under the 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 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 this is required or permitted by law.

To whom we may disclose your personal information

CCBA may share your personal information with:

- 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 any legal or regulatory obligation; 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 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 in accordance with our instructions.

How we safeguard your personal information

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review security controls and related processes to ensure that your personal information is secure.



Security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of personal information; and
- Investigating and reacting to security incidents.

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 anyone to whom we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

Your rights in relation to 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 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 is 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 it 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 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; and
- The right to lodge a complaint with the Information Regulator in South Africa 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 any of your other rights.



You can find out more information about your rights by contacting the South African Information Regulator, whose contact details are:

<http://www.justice.gov.za/inforeg/index.html>

General enquiries: inforeg@justice.gov.za

Complaints: complaints.IR@justice.gov.za

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@ccbgroup.com for the attention of the Privacy Specialist, who is responsible for overseeing compliance with this Notice.