



CCD COURIERS (PTY) LTD

2004/013559/07

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PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000, AS AMENDED

INTRODUCTION AND PURPOSE OF PAIA MANUAL

CCD Couriers (Pty) Ltd ("Company") is a private company with registration number 2004/013559/07. 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.

The Company is classified as a private body under the Promotion of Access to Information Act, based on its operational activities as a private courier and logistics company

This PAIA Manual is intended to assist the public in understanding how to exercise their right of access to information in terms of the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA). It enables members of the public to:

- Identify which categories of records held by the Company are available without submitting a formal PAIA request;
- Understand how to submit a valid request for access to records, including the relevant subjects and categories of records held;
- Access details of records made available in accordance with other legislation;
- Obtain the contact details of the Chief Information Officer who is designated to assist with access to records;
- Locate and access the official PAIA Guide, as published by the Information Regulator, for assistance in navigating the request process;
- Understand whether the Company processes personal information, the purpose for such processing, and the categories of data subjects and personal information involved;
- Identify the categories of recipients to whom personal information may be supplied, including where such transfers may occur outside the Republic of South Africa; and
- Confirm the security safeguards the Company has in place to ensure the confidentiality, integrity, and availability of the personal information it processes.

ALIGNMENT OF PAIA AND POPIA

This manual incorporates key amendments to the Promotion of Access to Information Act (PAIA), as introduced by the Protection of Personal Information Act (POPIA). These changes include:

- The expanded role and authority of the Information Regulator.
- New obligations for private bodies to manage access to records while safeguarding personal privacy.
- Mandatory inclusion of security measures, transborder data flow disclosures, and updated complaint handling.
- CCD Couriers (Pty) Ltd processes personal information solely on behalf of institutional clients, and access requests must align with both PAIA and POPIA requirements.

KEY CONTACT INFORMATION FOR THE COMPANY

INFORMATION OFFICERs	
Information Officer	Mandla Mthetwa
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 the handling of your personal information, you may escalate your complaint to the South African Information Regulator: <https://www.justice.gov.za/inforeg/> (See Forms).

GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille (<https://inforegulator.org.za/paia/>)

The PAIA Manual and request forms are available in English. Reasonable accommodations will be made to assist requesters who require access in another official language or who are unable to complete the form due to disability or illiteracy.

CATEGORIES OF RECORDS OF CCD COURIERS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Record	Type of Record	Access Method
Legal and Compliance	PAIA Manual (This Policy)	Download from website or request via email
Privacy and Data Protection	Privacy Notice	Download from website or request via email
Corporate Governance	B-BBEE Certificate	Download from website or request via email
Regulatory Certification	ICASA Certificate	Download from website or request via email
Regulatory Certification	Information Regulator Certificate	Download from website or request via email

PROCESSING OF PERSONAL INFORMATION

Categories of Data Subjects and Personal Information

The Company processes personal information to enable it to deliver secure, regulated, and high-assurance logistics and courier services. Processing occurs for the following purposes:

Purpose of Processing	Category of Data Subjects	Personal Information that May Be Processed
Service Delivery	Clients	Company name, contact details, service agreements, authorisation forms, and bank details
	Recipients	Name, ID number, address, contact numbers, delivery confirmation data, facial recognition image, GPS photo, and FICA/RICA documentation
	Authorised Third Party Recipients	Name, ID number, signature and appointment logs
Legal Compliance	All categories	FICA, RICA, AML, POPIA and PAIA-related data, compliance certificates, and audit logs

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Risk and Security Management	Recipients, Courier Personnel, Risk Subjects	GPS location data, facial biometrics, incident photos, SAPS clearance, internal logs, and safe custody records
Operational Execution	Courier Personnel, Clients, Recipients	Delivery scan data, unsuccessful delivery logs, and reverse logistics records
Human Resources	Employees and Applicants	Name, ID number, qualifications, address, payroll data, job title, credit and criminal clearance, race, gender, and performance logs
Business Management	Suppliers and Vendors	Company name, VAT number, banking details, BEE certificate, and signed agreements, trade references
Digital Delivery and Portal Access	Digital Platform Users	Login credentials, profile info, access logs, usage metadata, and secure communication records
Internal Record Keeping	All internal data subjects	Audit trails, internal memos, disciplinary records, and complaints handling history
Regulatory Reporting	Regulators and Authorities	Names of officials, correspondence records, and compliance submissions
Investigations and Security Events	Risk and Investigative Subjects	Polygraph results, investigation summaries, witness statements, and incident logs

The recipients or categories of recipients to whom the personal information may be supplied in accordance with Section 51(1)(f) of PAIA and the principles of lawful processing under POPIA

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number, name, and criminal history	South African Police Service (SAPS), Department of Justice and Correctional Services
Qualifications, academic history	South African Qualifications Authority (SAQA), accredited educational institutions
Credit and payment history	Registered Credit Bureaus (e.g. Experian, TransUnion)
FICA/RICA-related documents (proof of address, ID, etc.)	Client institutions subject to FICA/RICA compliance (e.g. banks, insurance firms, telecom providers)
Delivery recipient confirmation (ID, image, signature)	Contracted client who initiated the delivery, via CCD's digital platforms or reports
Courier logs, proof of delivery (POD), and tracking data	CCD clients for audit and compliance purposes
Disciplinary records, polygraph results	Internal HR and Security teams; external legal representatives (if part of proceedings)
B-BBEE and procurement certifications	Government departments and large enterprise clients conducting supplier vetting
Tax and employment records (staff)	South African Revenue Service (SARS), Department of Labour, UIF, Compensation Fund
Surveillance and incident reports	Internal Risk and Compliance Division, insurance underwriters, or SAPS in event of criminal investigation
Access logs and digital behaviour on platforms	Internal IT and Information Security teams
Email and phone logs related to complaints	Internal Client Services Department; external Ombuds (if escalated)

All transborder transfers are subject to appropriate contractual and technical safeguards, including:

- Processor agreements aligned with Section 72 of POPIA
- Countries with adequate data protection laws (e.g., GDPR compliance in the EU)
- End-to-end encryption and secure authentication protocols

The Company does not sell or distribute personal data to foreign recipients for marketing or profiling purposes. All cross-border processing is linked strictly to service delivery, security, or compliance requirements.

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General Description of Information Security Measures as required under Section 51(1)(h) of PAIA and in accordance with Section 19 of POPIA

The Company maintains a robust and layered information security framework to ensure the **confidentiality, integrity, and availability** of all personal information it processes. These safeguards apply to all data handled within its courier operations, secure facilities, and digital platforms including high-assurance delivery workflows for regulated industries.

PCI CPP Compliance (Delivery to End User Phase)

CCD Couriers is **fully compliant with the applicable requirements of the PCI CPP (Card Production and Provisioning) standard** insofar as they relate to the **secure delivery and handover of payment cards to end users**.

This includes:

- Secure custody and transport of card parcels
- Chain-of-custody tracking from point of collection to delivery
- Identity and address verification at the point of delivery
- Optional biometric and photographic confirmation
- Physical security controls for vehicles and parcels in transit

CCD holds a valid **Attestation of Compliance (AOC)** for this scope, issued by an independent Qualified Security Assessor (QSA). While CCD is not involved in the manufacturing or personalisation of cards, it complies with all applicable **distribution-phase controls** under PCI CPP.

Physical and Organisational Safeguards

- Access-controlled premises with biometric entry systems
- CCTV monitoring at warehouses, fulfilment stations, and loading areas
- Segregation and lockup of sensitive parcels in secured areas
- Vetted and security-trained drivers and delivery personnel
- Incident logging and response protocols for any parcel irregularities

Technical and Digital Safeguards

- End-to-end encryption of personal data during routing and tracking
- Anti-malware protection and endpoint lockdown on company devices
- Role-based access control for all internal systems and parcel tracking apps
- GPS tracking and geo-fencing for delivery routes
- Multi-Factor Authentication (MFA) and activity logging in admin interfaces

Governance, Monitoring, and Compliance

- Appointed Information Officer and POPIA Governance Lead
- Monthly internal audits and policy reviews
- Data breach response plan with regulator notification protocol
- Ongoing staff awareness training on information security and confidentiality

CCD Couriers applies all measures proportionate to its function as a regulated courier and delivery handler of sensitive personal data, ensuring compliance with POPIA, PAIA, and PCI CPP (where applicable to last-mile card delivery).

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ADDITIONAL GOVERNANCE MEASURES AND INTERNAL PROCEDURES

Internal Process for Handling Requests

Upon receipt of a request for access to information (See Forms), CCD Couriers follows a structured internal workflow as follows:

1. The Information Officer/Deputy Information Officer receives and acknowledges the request.
2. A fee notice is issued if applicable, as per the prescribed PAIA Fee Schedule.
3. The requested record is identified and located in consultation with relevant departments or third parties (Client from whom service is requested).
4. A decision is made within 30 days to grant or refuse access or advice given for an extension to be made.
5. The decision is communicated to the requester, including reasons and applicable remedies.

Please note: CCD Couriers (Pty) Ltd processes and stores personal and confidential information on behalf of its clients in the ordinary course of delivering secure and compliant logistics services focused on identity verification. As such, not all records held by the Company are generated for its own purposes. Many are collected, processed, and retained under service agreements with its clients to whom requests may be directed for addressing replies.

Requests Involving Third Parties

In terms of section 71 of PAIA, if a request for access to a record includes information that pertains to a third party (including a client, data subject, or any external party), the Company will:

- Issue a formal notice to the third party, informing them of the request;
- Allow the third party 21 (twenty-one) calendar days to make written or oral representations as to why the record should not be disclosed;
- Consider such representations before making a final decision;
- Notify the requester of the outcome after considering the third party's response.

If the Company holds the record on behalf of a client (e.g., identity documents, proof of address, parcel recipient data), and the nature of the relationship is governed by a confidentiality or service agreement, the Company may:

- Transfer the request to the client, or
- Request the client's authorisation before access is granted, in accordance with contractual obligations and legal considerations.

The Company cannot be compelled to disclose information that would constitute a breach of a legal duty of confidentiality owed to its clients or any third party.

Request Timeframes and Extension

The Company endeavours to respond to all valid access requests within 30 (thirty) calendar days, as prescribed by PAIA.

However, in accordance with section 57 of PAIA, CCD Couriers may extend the response time by an additional 30 (thirty) calendar days if: (1) the request requires searching through large volumes of records; (2) consultation with another private body or third party is necessary; and/or (3) the request is complex and requires careful legal assessment.

Requesters will be notified in writing of any such extension and the revised expected response date.

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Payment of Fees

The Company may require the payment of prescribed access fees before a request is processed or prior to granting access to records. These fees are governed by Regulation 11 to PAIA and may include:

- A request fee for non-personal requesters;
- Access fees per page copied, printed, or electronically produced;
- Postage or delivery charges.

Even where access is granted, records will not be made available until full payment of applicable fees is received. A formal fee notice will be issued detailing the total cost before fulfilment.

Grounds for Refusal of Access

Requests for access may be lawfully refused based on the grounds provided in Chapter 4 of PAIA. These include, but are not limited to:

- Protection of personal information of third parties
- Protection of commercial information or trade secrets
- Records subject to legal privilege
- Records the disclosure of which may endanger life or security
- Records that do not exist or cannot be found

The decision to refuse access must be clearly justified, and such refusals will be documented internally.

Remedies Available to Requesters

Where a request for access is refused, the requester may exercise the following remedies:

- Lodge a complaint with the Information Regulator (See Forms)
- Apply to the High Court for appropriate relief under Section 78 of PAIA

There is no internal appeal procedure for private bodies. CCD Couriers will cooperate fully with any external proceedings initiated.

Monitoring and Reporting

CCD Couriers maintains a secure, access-controlled register of all PAIA and POPIA requests. This register tracks:

- Dates of requests received and processed
- Nature of the request
- Outcome and basis for any refusal
- Whether fees were charged

Summary reports are submitted quarterly to executive oversight structures. Annual statistics may be submitted to the Information Regulator if requested.

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POLICY REVIEW

This policy will be reviewed annually by the Information Officer. In the event that new risks are identified or operational needs change, this policy may be amended earlier. Recommendations for revision must be submitted in writing to the Information Officer.

FORMS

Item Number	Document Title	Link
1	Form 2 – Request for Access To Record	https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf
2	Form 3 – Outcome of Request and Fees Payable	https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf
3	Form 5 – Complaint to Information Regulator (re: Refusal of PAIA Request)	https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf

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