



# PRIVACY & DATA POLICY

## 1. INTRODUCTION

- 1.1 This Privacy Policy sets out how Integrated Convoy Protection (Pty) Ltd. (“the Company”, “we”, “us”, or “our”) collects, uses, processes, stores, and protects Personal Information in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”), the Promotion of Access to Information Act, 2 of 2000 (“PAIA”), and applicable regulations issued by the Information Regulator.
- 1.2 We are committed to lawful, reasonable, and transparent processing of Personal Information.
- 1.3 By engaging with us, you acknowledge that you have read and understood this Privacy Policy

## 2. DEFINITIONS

- 2.1 “Personal Information” means information relating to an identifiable, living natural person and, where applicable, an identifiable juristic person, as defined in POPIA.
- 2.2 “Data Subject” means the person to whom Personal Information relates.
- 2.3 “Operator” means a third party who processes Personal Information on behalf of the Company.
- 2.4 “Processing” means any operation or activity concerning Personal Information, including collection, recording, storage, dissemination, or destruction.

## 3. COLLECTION OF PERSONAL INFORMATION

- 3.1 We may collect or obtain Personal Information about you in the following ways:
  - directly from you;
  - during the course of our relationship with you or your organisation;
  - when you make your Personal Information public;
  - when you visit or interact with our website, applications, or social media platforms;
  - when you register for or use our services, including newsletters, events, or updates;
  - when you visit our premises; or
  - from third parties, including regulators, public records, or law enforcement authorities where permitted by law.
- 3.2 We may also generate Personal Information through your interactions with us, including communication records, service engagement, recruitment processes, and marketing activities.

## 4. CATEGORIES OF PERSONAL INFORMATION

We may process the following categories of Personal Information:

- Personal details (e.g. name, photograph);
- Demographic information (e.g. gender, date of birth, nationality);
- Identification information (e.g. ID or passport number);
- Contact details (e.g. address, telephone number, email);
- Financial and payment information;



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- Employment and professional information;
- Service-related and correspondence information;
- Technical data (e.g. IP address, browser type, device information);
- Consent and marketing preference records.

## 5. SPECIAL PERSONAL INFORMATION AND CHILDREN

We do not intentionally process special personal information or Personal Information relating to children unless:

- permitted by law;
- consent has been obtained from a competent person; or
- processing is necessary for legal obligations or rights.

## 6. PURPOSES AND LAWFUL BASIS FOR PROCESSING

6.1 We process Personal Information only where there is a lawful basis, including:

- consent;
- contractual necessity;
- legal obligation;
- legitimate interests; or
- protection of a legitimate interest of the Data Subject.

6.2 Personal Information is processed for purposes including:

- providing and managing services;
- communication and relationship management;
- compliance with legal and regulatory obligations;
- risk management and fraud prevention;
- recruitment and employment;
- internal reporting, audits, and governance;
- service improvement and analytics;

## 7. DISCLOSURE OF PERSONAL INFORMATION

7.1 We may disclose Personal Information to:

- employees and authorised representatives;
- Operators and service providers;
- regulators and law enforcement authorities;
- legal and professional advisors;
- third parties involved in legal proceedings;



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- parties involved in a business transfer or restructuring.

## 7.2 All Operators are required to:

- process Personal Information only on our instructions;
- implement appropriate security measures; and
- comply with applicable data protection laws.

## 8. CROSS-BORDER TRANSFERS

Personal Information may be transferred outside South Africa where:

- the recipient provides an adequate level of data protection;
- the Data Subject consents; or
- the transfer is necessary for contractual or legal purposes.

## 9. INFORMATION SECURITY

9.1 We implement appropriate technical and organisational measures to protect Personal Information against loss, unauthorised access, or unlawful processing.

9.2 In the event of a data breach, we will notify:

- the Information Regulator (South Africa); and
- affected Data Subjects, where required by law.

## 10. DATA QUALITY AND MINIMISATION

10.1 We take reasonable steps to ensure Personal Information is accurate, complete, and up to date.

10.2 We limit processing to what is necessary for the purpose for which the information was collected.

## 11. RETENTION OF PERSONAL INFORMATION

11.1 Personal Information will be retained only for as long as necessary to:

- fulfil the purpose for which it was collected;
- comply with legal or regulatory requirements; or
- protect legitimate business interests.

11.2 Thereafter, information will be securely deleted or de-identified.

## 12. DATA SUBJECT RIGHTS

12.1 Data Subjects have the right to:

- access their Personal Information



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- request correction or deletion
- object to processing (including direct marketing)
- withdraw consent
- lodge complaints
- request access to third-party disclosures.

12.2 Requests may be submitted via:

- Email: [info@icp.co.za](mailto:info@icp.co.za)
- SMS: +27 12 811 8600

12.3 Objection requests will be prioritised and processed without undue delay.

12.4 We may require proof of identity before processing requests.

## 13. INFORMATION OFFICER

The Company has appointed an Information Officer responsible for POPIA compliance.

### Information Officer Details:

**Name:** Verina Marx  
**Address:** Klipkop Portion 70, Lynnwood Rd Extension, Pretoria  
**Telephone:** +27 12 811 8600  
**Email:** [info@icp.co.za](mailto:info@icp.co.za)

## 14. COMPLAINTS

If you are dissatisfied, you may lodge a complaint with the Information Regulator (South Africa)

**Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

**Postal Address:** P.O Box 31533, Braamfontein, Johannesburg, 2017

**Email:** [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**General Enquiries:** [enquiries.IR@justice.gov.za](mailto:enquiries.IR@justice.gov.za)

**Website:** <https://www.justice.gov.za/inforeg/>

## 15. UPDATES TO THIS POLICY

15.1 We may update this Privacy Policy from time to time.

15.2 The latest version will always be available on our website and will indicate the effective date.

## 16. PAIA MANUAL

16.1 Our PAIA Manual is available upon request via [info@icp.co.za](mailto:info@icp.co.za)

16.2 The PAIA Manual explains how to request access to records held by the Company.



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## 17. WEBSITE USAGE AND COOKIE POLICY

### 17.1 Cookie Consent Principles

17.1.1 We implement a cookie consent mechanism that requires active, prior consent for non-essential cookies.

17.1.2 Non-essential cookies will NOT be placed unless you explicitly opt in.

### 17.2 Types of Cookies

- Essential Cookies – always active
- Functional Cookies – require consent
- Analytics Cookies – require consent
- Marketing Cookies – require consent

### 17.3 Cookie Banner and Controls

17.3.1 Upon first visit, users are presented with a cookie banner allowing:

- Accept All
- (Reject Non-Essential Cookies)
- Manage Preferences

17.3.2 No pre-ticked boxes are used.

### 17.4 Withdrawal of Consent

Users may withdraw or modify consent at any time via the cookie settings tool on the website.

### 17.5 Third-party Cookies

Third-party cookies are subject to their own privacy policies.

## 18. WEBSITE COMPLIANCE AND ONLINE DATA PROCESSING

### 18.1 Lawful Processing of Online Data

We process Personal Information collected through our website in accordance with POPIA principles, including:

- accountability;
- processing limitation;
- purpose specification;
- further processing limitation;
- information quality;
- openness;
- security safeguards; and
- data subject participation.



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## 18.2 Online Forms and Data Collection

When you submit information through our website (e.g. contact forms, subscriptions, or registrations), you agree that:

- the information provided is accurate and complete;
- we may process such information for the stated purpose; and
- we may retain the information in accordance with this Privacy Policy.

## 18.3 Website Security

18.3.1 We take reasonable technical and organisational measures to secure our website and protect Personal Information, including:

- secure servers and encryption where appropriate;
- access controls;
- monitoring for unauthorised access or misuse.

18.3.2 Despite these measures, the transmission of information over the internet is not completely secure, and we cannot guarantee absolute security.

## 19. PAIA Manual Access

19.1 In accordance with the Promotion of Access to Information Act, 2 of 2000 (“PAIA”), our PAIA Manual is available upon request.

19.2 The PAIA Manual provides information on how to request access to records held by the Company.

## 20. Consent to Electronic Transactions

By using our website, you consent to:

- the electronic collection and processing of your Personal Information;
- communication via electronic means; and
- the use of cookies and similar technologies as described in this Policy.

## 21. EFFECTIVE DATE

This Privacy Policy (including the Cookie Policy and Website Compliance section) is effective as of: 15 April 2026