



CCTV PRIVACY NOTICE

Your trust matters to us. That is why we protect your personal information and use it responsibly. At FedEx Express South Africa (Pty) Ltd and its operating groups, subsidiaries and divisions, including any TNT company ("**FedEx**"), we are committed to protecting your privacy and the security of your personal information. FedEx has created this CCTV Privacy Notice ("**CCTV Notice**") to explain how FedEx uses Closed Circuit Television ("**CCTV**") and the recording that shows your personal information, which in this context is any information relating to an identifiable, living natural person, such as your image ("**Personal Information**").

Last update: June 2021.

When this CCTV Notice mentions "FedEx", "we", "us", or "our", FedEx is referring to the local FedEx Company that controls the CCTV system through which your image is captured.

Contact information

If you have any questions regarding the processing of your personal information you can contact FedEx South Africa at the details listed below, which is available to deal with requests for information, applications or complaints. Notwithstanding your right to contact your local FedEx Company, you always have the right to contact the FedEx headquarters directly at the details also listed below, which is also available to deal with requests for information, applications or complaints.

FedEx Express South Africa (Pty) Ltd

Attn: Legal Department

1 – 7 Romeo Road

Boksburg

Gauteng

South Africa

E: MEISA_Privacy@fedex.com

FedEx Corporation

Attn: Legal Department - Compliance

1000 Ridgeway Loop Road, Ste 600

Memphis, TN 38120

United States of America

E: dataprivacy@fedex.com

Overview

This CCTV Notice answers the following questions:

1. Does this CCTV Notice apply to you?
2. What Personal Information does FedEx collect?
3. Why does FedEx process Personal Information?
4. Who has access to your Personal Information?
5. How long will FedEx process your Personal Information?
6. What measures does FedEx take to protect your Personal Information?
7. Where does FedEx store or transfer your Personal Information?
8. What rights can you exercise in relation to your Personal Information?
9. What if you have other questions or complaints?
10. Will there be updates to this CCTV Notice?

1. Does this CCTV Notice apply to you?

This CCTV Notice applies to you if you are an employee, contractor or any other visitor of the premises of FedEx where CCTV is used. If CCTV is used on a premise of FedEx, this will be indicated with a sign at the entrance(s) to the premises.

2. What Personal Information does FedEx collect?

Through the CCTV system, your image is captured and recorded.

3. Why does FedEx process Personal Information?

Personal Information will only be collected, used, stored or otherwise processed when necessary for FedEx within the framework of securing its premises, to ensure the safety and health of individuals, to protect its business property and assets. FedEx will only process Personal Information based on applicable legal ground(s). To clarify why we process Personal Information, we will first clarify the legal ground(s), subsequently, we will clarify our relevant business purpose(s).

Legal Grounds

FedEx processes your Personal Information based on one of the following legal grounds:

- The processing is necessary for us to comply with our legal obligations,
- The processing is necessary to protect your legitimate interests, or
- The processing is necessary for pursuing the legitimate interests of FedEx.

Business Purposes

FedEx will only collect, use or otherwise process Personal Information if the processing falls within the scope of one (or more) of the following legitimate business purposes:

1. **Safety and security.** This purpose addresses activities such as those involving health and safety, the protection of FedEx assets, FedEx employees' assets and customer, supplier or business partner assets and the authentication of employee, customer, supplier or business partner status and access rights. This includes the processing that is necessary for the prevention and investigation of incidents, and also the security of access to FedEx premises, including buildings and sites;
2. **Protecting the vital interests of employees or others.** This is where processing is necessary to protect the vital interests of an employee or others, e.g. for safety and urgent medical reasons;
3. **Compliance with legal obligations.** This addresses the processing of Personal Information as necessary for compliance with, and investigating employee compliance with, laws, regulations and sector specific guidelines to which FedEx is subject and the processing of Personal Information that is necessary for compliance with, and investigating employee compliance with, internal FedEx policies. This includes processing that is necessary for the prevention and investigation of incidents, including crime or fraud committed on FedEx premises (e.g. a search warrant from a law enforcement agency).

In case of suspicion of crime or fraud or other serious incidents, FedEx can install hidden cameras. FedEx will only collect your Personal Information through hidden cameras when this is considered necessary for the abovementioned purposes. FedEx will only use hidden cameras temporarily and will keep the invasion into the private life of the people recorded by hidden cameras restricted to a minimum.

4. Who has access to your Personal Information?

FedEx shares your Personal Information internally and with third parties in the following circumstances:

- With its affiliates, operating groups, subsidiaries and divisions, or with third parties if such is necessary for the purposes as listed above. If appropriate, FedEx will require third parties to conduct activities in a manner consistent with FedEx policies and guidelines in relation to data protection.
- With data processors, i.e. parties processing Personal Information on our behalf. In such cases, these third parties are only allowed to use your Personal Information for the purposes described above and only in accordance with our instructions. FedEx will only use processors which provide sufficient guarantees to implement appropriate technical and organizational measures and ensure the protection of the rights of data subjects.
- With its employees if and to the extent necessary for the performance of their tasks. In such a case, access will be granted only if and to the extent necessary for the purposes described above and only if the employee is bound by confidentiality.
- If and when required to do so by law, court order, or other legal process, for example, with law enforcement agencies or other governmental agencies, to establish or exercise our legal rights or in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. How long will FedEx process your Personal Information for?

We will retain your Personal Information no longer than necessary for the purpose(s) for which we process your Personal Information in accordance with our retention policies and in accordance with (local) law. After the retention period we will delete or anonymize your Personal Information, unless we need to retain certain of your Personal Information for another purpose. We will only do so if we have a legal ground to retain your Personal Information. We will also ensure that Personal Information is only accessible for that other purpose.

Regarding CCTV images specifically, FedEx will retain your Personal Information for a maximum of 90 calendar days. After this period, your Personal Information will be automatically erased, unless FedEx has a legal ground to do otherwise, for example the investigation into a specific incident. In such cases, FedEx will erase your Personal Information after it is no longer necessary for the purpose of the processing.

6. What measures does FedEx take to protect your Personal Information?

FedEx has taken appropriate technical and organizational measures to protect your Personal Information against accidental or unlawful processing, including by ensuring that:

- Your Personal Information is protected against unauthorized access;
- The confidentiality of your Personal Information is assured;
- The integrity and availability of your Personal Information will be maintained;
- Personnel are trained in information security requirements; and
- Actual or suspected data breaches are reported in accordance with applicable law.

7. Where does FedEx store or transfer your Personal Information to?

Generally, the CCTV recordings are stored locally. However, FedEx may need to transfer your Personal Information to other locations, which may include locations outside the country where you reside. In any case where we transfer Personal Information, FedEx shall ensure that such a transfer is based on a legal ground and subject to appropriate safeguards.

Transfers of Personal Information originating from South Africa to operating groups, subsidiaries and divisions within FedEx cross-border and internationally are governed by section 72 of the Protection of Personal Information Act 4 of 2013 ('**POPIA**').

8. What rights can you exercise in relation to your Personal Information?

In accordance with the law applicable to the use of your Personal Information, you have rights in relation to your Personal Information. A number of rights that you have in relation to your Personal Information, as applicable in South Africa, are explained below:

Right of access

You are entitled to a copy of the Personal Information we hold about you and to learn details about how we use it. Your Personal Information will usually be provided to you digitally or we might offer you the possibility of viewing your Personal Information (i.e. the relevant images) on premise. As a rule, we will require you to prove your identity before providing the requested information.

Right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you believe this is not the case, you have the right to request that any incomplete or inaccurate Personal Information that we process about you is amended.

Right to erasure

You have the right to ask us to delete your Personal Information, for example where the Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or where we hold Personal Information we are no longer authorized to retain.

Right to object

You have the right to object to processing carried out in order to protect your or a third party's legitimate interests. You may also ask us to stop using your Personal Information that we are processing for direct marketing purposes at any time (if any), and if you do so, FedEx will immediately cease to use your Personal Information. For other purposes based on our legitimate interests, we will no longer process the Personal Information on that basis when you file an objection, unless we have a compelling legitimate ground for the processing.

Right to withdraw consent

We may ask for your consent to process your Personal Information in specific cases. When we do this, you have the right to withdraw your consent at any time. FedEx will stop the further processing as soon as possible after the withdrawal of your consent. However, this does not affect the lawfulness of the processing before consent was withdrawn.

Please use [this link](#) if you would like to exercise any of your rights.

9. What if you have other questions or complaints?

Questions or complaints regarding the processing of your Personal Information can be directed to FedEx by using the contact information as provided at the top of this CCTV Notice.

You also have the right to lodge a complaint with the Information Regulator established under section 39 of POPIA.

10. Will there be updates to this CCTV Notice?

FedEx may update this CCTV Notice from time to time. If an amendment will have a serious privacy impact, FedEx will inform you about such amendments as required in terms of law.