031 569 1029
52 Kubu Ave, Riverhorse Valley
Business Estate, Newlands East, 4037
www.pedroschicken.co.za

PRIVACY POLICY

Pedros Flame Grilled Chicken

This policy explains how Pedros Flame Grilled Chicken collects, uses, and protects your personal information across South Africa, Kenya, Zambia, Botswana, and Eswatini.

Field	Details
Effective from	23 November 2026
Version	1.1 (adds Eswatini; replaces version 1.0, effective 14 September 2026)
Applies in	South Africa, Kenya, Zambia, Botswana, and Eswatini
Covers	Customers, loyalty members, store visitors, and job applicants

Contents

1. Introduction 3
2. Who We Are, and How to Reach Us 3
3. The Information We Collect 3
4. How We Use Your Information 4
5. Our Legal Grounds for Processing 4
6. Sharing Your Information 5
7. Sending Information Across Our Five Countries 5
8. Cameras in Our Stores 6
9. Marketing You Can Control 6
10. Cookies and Similar Tools Online 7
11. Keeping Your Information Safe 7
12. How Long We Keep Information 7
13. Children and Family Promotions 7
14. If You Work for Us, or Apply To 7
15. Your Rights 8
16. How to Complain 8
17. Changes to This Policy 9
18. Contact Us 9

1. Introduction

Pedros Flame Grilled Chicken exists to serve good food fast, and that means we handle a fair amount of personal information along the way: your name when you order, your phone number when we text you that your chicken is ready, your card details when you pay, even your face on a security camera if you pop into one of our stores. This policy explains what we collect, why we collect it, and what you can do about it.

We're headquartered in South Africa, with restaurants across Kenya, Zambia, Botswana, and Eswatini too. Five countries means five data protection laws: the Protection of Personal Information Act (POPIA) in South Africa, the Data Protection Act, 2019 in Kenya, the Data Protection Act, 2021 in Zambia, the Data Protection Act, 2024 in Botswana, and the Data Protection Act, 2022 in Eswatini. Rather than write five separate policies, we built this one around whichever rule is strictest wherever the five laws disagree. If Zambia expects a breach notice within 24 hours and South Africa simply says “as soon as reasonably possible,” we notify within 24 hours everywhere. That's the bar we hold ourselves to, no matter which country you're ordering from.

This policy applies to customers who order at our stores, through our app or website, or through a delivery partner; to members of our loyalty programme; to anyone whose image our store cameras record; and, in the later sections, to people who apply to work with us. It doesn't cover other companies' websites or apps, even ones we link to.

Note: *This policy is a practical framework, built from publicly available legislation as at November 2026. Botswana's Data Protection Act, 2024 only recently replaced the country's 2018 Act, and its new Information and Data Protection Commission is still settling into its role. In Eswatini, the Eswatini Communications Commission acts as the Data Protection Authority under the Data Protection Act, 2022, and continues to issue the detailed rules and decisions that sit under the Act. We recommend having this document checked by qualified legal counsel in each country before it's published or relied on for compliance purposes.*

2. Who We Are, and How to Reach Us

Pedros Flame Grilled Chicken (Pedros, we, us, or our) is the responsible party under POPIA and the data controller under the laws of Kenya, Zambia, Botswana, and Eswatini for the personal information described in this policy. Our head office is at 52 Kubu Ave, Riverhorse Valley Business Estate, Newlands East, 4037, South Africa.

If you have a question about your information, or you want to use any of the rights set out later in this policy, contact our privacy team at legal@pedroschicken.co.za, or call us on 031 569 1029 (+27 31 569 1029 if you're calling from outside South Africa).

3. The Information We Collect

What we collect depends on how you interact with us.

When you order in person, we collect whatever you tell the till: your order, and your payment method. If you pay by card, the card itself is read by our payment provider's terminal, not by us; we never see or store your full card number.

When you order through our app or website, we also collect your name, phone number, email address, delivery address (if you want delivery), and your order history. If you create an account, we keep your login details and any preferences you set, such as your favourite store or your go to order.

When you join our loyalty programme, we add your points balance, your redemption history, and, if you choose to share it, your birthday, so we can send you something nice on the day.

When you order through a delivery partner rather than directly with us, that partner collects your name, address, and phone number to get your food to you, and shares your order details with us so we can prepare it. We don't control what a delivery partner does with your information beyond that order; their own privacy policy governs the rest of their handling.

When you visit one of our restaurants, our security cameras record footage of the premises, including you, for as long as you're on site.

When you contact us, whether that's a compliment, a complaint, or a question, we keep a record of what you told us and how we responded.

We don't go looking for more than we need. We don't buy personal information about you from data brokers, and we don't collect information we can't explain a genuine use for.

4. How We Use Your Information

We use your information to:

- take, prepare, and hand over your order, whether you're eating in, ordering ahead, or having it delivered
- run our loyalty programme: working out your points, and letting you redeem them
- keep our stores, staff, and customers safe, largely through the camera footage described in Section 8
- send you the marketing you've actually asked for, and nothing you haven't
- improve our menu, our stores, and our service, generally using information that's been grouped together so it no longer identifies you personally
- meet our legal and tax obligations, and respond properly when a regulator, court, or law enforcement agency has the authority to ask us to
- investigate and resolve complaints, fraud, theft, or any other incident affecting our business or our customers

5. Our Legal Grounds for Processing

Every one of the five laws requires us to have a proper legal reason before we process your personal information. In practice, we rely on one of the following, depending on what we're doing and where you are.

Performing our contract with you.

Taking and fulfilling your order, and running your loyalty account, both require us to process your details; without your name, your order, and somewhere to send it, we simply can't serve you.

Consent.

Marketing messages, birthday rewards, and anything else that's optional all rest on your consent, which you can withdraw at any time; see Section 9 for how.

Legal obligation.

Tax law, consumer protection law, and food safety law all require us to keep certain records, sometimes for years after your last order.

Legitimate interest.

All five laws recognise this ground in some form, and we lean on it for things like keeping our stores safe through camera coverage, or spotting fraud on a loyalty account. We weigh this against your right to privacy every time, and we don't use it to justify anything intrusive, like building marketing profiles without your knowledge.

Protecting a vital interest, or acting in the public interest.

These grounds come up rarely, usually in an emergency, such as a medical incident inside one of our stores.

6. Sharing Your Information

We share your information only where we genuinely need to, and we never sell it.

Delivery partners.

If you order through a delivery app rather than directly with us, we share your order and contact details with the driver assigned to deliver it, only for as long as the delivery takes.

Payment processors.

Our card payment partner handles your card details directly; we receive confirmation that a payment succeeded, never your full card number.

Technology providers.

The companies that host our app, our website, our loyalty programme, and our till systems process personal information on our instructions, under contracts that require them to protect it and use it only for the purpose we've set.

Franchisees and store operators.

Some Pedros restaurants are run by franchisees rather than by Pedros directly. Where that's the case, both Pedros and the relevant franchisee may process your information to run the store you visited.

Professional advisers, auditors, and insurers.

We share what's needed with our lawyers, accountants, and insurers, generally to get advice or to handle a claim.

Regulators and law enforcement.

We hand over information when a court order, statute, or a properly authorised request from a regulator or the police requires it, and we check every such request before we respond to it.

We don't share your information with anyone else for their own marketing purposes without asking you first.

7. Sending Information Across Our Five Countries

Running restaurants in five countries means information sometimes needs to travel between them. Our central systems, including the loyalty programme and the app, may be hosted in South Africa or with a cloud provider elsewhere, even for customers in Kenya, Zambia, Botswana, or Eswatini.

We take this seriously, because each country treats it differently. Zambia's Data Protection Act, 2021 generally requires personal information to be processed and stored on a server inside Zambia, and only allows information to leave the country with your consent and an approved contract, or with ministerial authorisation. Botswana's Data Protection Act, 2024 requires us to keep a copy of your information inside Botswana even while we process it elsewhere, and any transfer needs either a formal adequacy finding from the Information and Data Protection Commission or a properly binding contract. Kenya's Data Protection Act, 2019 lets us transfer information where the receiving country offers adequate protection, where we've put a suitable contract in place, or where you've given consent, though sensitive information, such as health or biometric data, always needs your explicit consent first. South Africa's POPIA allows transfers where the recipient is bound by rules at least as protective as our own, or where you've consented.

Eswatini's Data Protection Act, 2022 draws its line at the edge of the Southern African Development Community (SADC). Information may go to another SADC country, such as South Africa, Zambia, or Botswana, only where that country's law meets SADC data protection standards, the transfer is genuinely necessary, and the recipient uses the information only for the purpose it was sent. Sending it outside SADC, which includes Kenya and many cloud hosting locations, needs an adequate level of protection in the receiving country; where that isn't in place, the transfer must rest on your clear consent, on being necessary to fulfil your order or another contract with you, or on authorisation from the Eswatini Data Protection Authority, backed by suitable contract terms.

In practice, this means we keep a local copy of your information wherever a country's law demands it, we use contracts with our service providers that meet the strictest of the five standards, and we ask for your consent before sending anything across a border where the law requires it.

8. Cameras in Our Stores

Our restaurants use security cameras, mainly at entrances, tills, and stock areas, to protect our staff, our customers, and our stock. We don't put cameras in bathrooms or staff changing areas.

We usually keep footage for 30 days, unless it's needed for longer because of an incident, an insurance claim, or a legal request, in which case we keep the relevant footage until that matter is closed. Only a small number of managers and our security team can view footage, and every viewing is logged.

If you want to know whether footage of you exists, or you'd like a copy, write to legal@pedroschicken.co.za with the date, time, and store, so we can locate it. We may need to blur other customers or staff who appear alongside you before we can share it with you.

9. Marketing You Can Control

We only send marketing messages, whether by SMS, email, or app notification, once you've said yes. When you join our loyalty programme or create an account, we'll ask you separately whether you'd like to hear about offers and new menu items; saying no to marketing never stops you using the programme or the app.

Every marketing message we send includes a way to opt out, and we act on that within a reasonable time, usually a few days. If you'd rather tell us directly, email legal@pedroschicken.co.za and we'll update your preferences.

10. Cookies and Similar Tools Online

Our website and app use cookies and similar technology to keep you logged in, remember your store and order preferences, and understand which pages and features people actually use. Some of these are essential, and can't be switched off without breaking basic functionality; others, like analytics and marketing cookies, only run with your consent, which you can give or withdraw through the cookie settings on our site.

11. Keeping Your Information Safe

We protect your information with a mix of technical and organisational measures: encrypted connections between your device and our systems, access controls that limit who inside Pedros can see what, and regular reviews of who has access to which system. Card payments run through a provider that meets the Payment Card Industry Data Security Standard, so we're never holding your full card number ourselves.

No system is perfect. If something does go wrong, we notify the relevant regulator within 24 hours of discovering the breach. We also tell you directly, in writing and as soon as reasonably possible, whenever we have reasonable grounds to believe someone without authority has accessed or acquired your information, and we give you enough detail to protect yourself. The only exceptions are where we can't establish who you are, or where the police or a regulator asks us to wait so we don't compromise a criminal investigation.

12. How Long We Keep Information

We keep personal information only as long as we actually need it. Order records typically last 5 years, mainly because tax and consumer protection law require it. Loyalty account information lasts as long as your account stays active, plus a short period afterwards in case you come back. Camera footage, as noted in Section 8, is usually gone within 30 days. Marketing preferences last until you withdraw consent, or until we lose touch with you for an extended period. Once none of these reasons apply anymore, we delete the information, or anonymise it properly, rather than let it sit on our systems indefinitely.

13. Children and Family Promotions

Pedros isn't aimed at children, and we don't knowingly collect personal information directly from anyone under 18 through our app, website, or loyalty programme. Our kids meals, and any toys or giveaways that come with them, are marketed to parents and guardians, who place the order and provide any information we need.

Where a competition or promotion is open to children (a colouring competition tied to a kids meal, for example), we ask a parent or guardian to enter on the child's behalf, and to give consent for us to use the child's name or artwork as part of that promotion. Eswatini's Data Protection Act, 2022 treats a child's information as sensitive and allows it to be processed only with a parent's or guardian's prior consent; we apply that same standard in all five countries. If we ever learn that we've collected information directly from a child without that consent, we delete it.

14. If You Work for Us, or Apply To

This policy focuses on our customers, but we also hold personal information about people who apply to work at Pedros, and people who already do: your CV, your references, your payroll details, and more. We handle that information under the same five laws, with the same care, though the fuller detail sits in our separate

staff privacy notice, available from your store manager or from Human Resources. If you've applied for a role and want to know what we hold about you, the contact details in Section 15 will get you there too.

15. Your Rights

All five of our countries give you meaningful rights over your own information, and while the fine print differs, the substance is remarkably similar. Wherever you're ordering from, you can generally:

- ask us what information we hold about you, and get a copy of it
- ask us to correct anything that's wrong or out of date
- ask us to delete information we no longer have a good reason to keep
- object to processing you disagree with, including marketing
- ask us to restrict how we use your information while a dispute gets sorted out
- ask for your information in a portable format, so you can take it elsewhere

A few country specific details are worth knowing too. In Kenya, we aim to give you a copy of your information within 7 days, and to correct anything you flag within 14 days, in line with the Data Protection Act, 2019. In Zambia, the Data Protection Act, 2021 lets a parent or guardian exercise these rights on a child's behalf. In Botswana, the Data Protection Act, 2024 gives you the right to know if a decision about you was made by a computer alone, with no human involved, and to ask for a person to review it. In South Africa, POPIA gives you that same protection against purely automated decisions, plus the right to object to direct marketing at any time, free of charge, no questions asked. In Eswatini, the Data Protection Act, 2022 lets you ask us, free of charge, whether we hold information about you, and to correct or delete anything inaccurate, out of date, or unlawfully obtained; we'll tell you the outcome within 14 days, and where a correction affects decisions about you, we'll let anyone we shared the old information with know within 7 working days. The Act also protects you from significant decisions based solely on automated processing, and lets you tell us to stop direct marketing at any time.

To use any of these rights, email legal@pedroschicken.co.za with enough detail for us to find your records: your loyalty number, the phone number on your account, or the store and date of your order, for instance. We may ask you to confirm your identity first, simply to stop someone else accessing your information by pretending to be you.

16. How to Complain

We'd rather you brought a concern to us first. Email legal@pedroschicken.co.za and we'll look into it properly. But you're never required to come to us first, and you can complain directly to the regulator in your own country at any time.

Country	Regulator	How to Reach Them
South Africa	Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191. enquiries@inforegulator.org.za, or POPIAComplaints@inforegulator.org.za for complaints. 010 023 5200 or 0800 017 160. inforegulator.org.za
Kenya	Office of the Data Protection Commissioner	info@odpc.go.ke. odpc.go.ke
Zambia	Data Protection Commission	dataprotection.gov.zm

Country	Regulator	How to Reach Them
Botswana	Information and Data Protection Commission	established under the Data Protection Act, 2024. Reachable in the meantime through the Botswana Communications Regulatory Authority, info@bocra.org.bw, +267 395 7755
Eswatini	Eswatini Communications Commission (ESCCOM), acting as the Eswatini Data Protection Authority	ESCCOM House, Plot 11/850, MR103, Ezulwini. P.O. Box 7811, Mbabane, H100. info@esccom.org.sz, +268 2406 7000. esccom.org.sz

Note: *Botswana's Data Protection Act, 2024 is still quite new, and the Commission it creates is still settling into its role. If you're in Botswana or Eswatini and unsure where to turn, our privacy team at legal@pedroschicken.co.za can point you in the right direction.*

17. Changes to This Policy

We review this policy at least once a year, or sooner if our business changes, or if any of the five laws it's built on change first. When we make a material change, we'll post a notice on our website and app, and update the effective date at the front of this document. It's worth checking back occasionally, especially if it's been a while since your last order.

18. Contact Us

Pedros Flame Grilled Chicken

Email: legal@pedroschicken.co.za

Phone: 031 569 1029 (+27 31 569 1029 from outside South Africa)

Head office: 52 Kubu Ave, Riverhorse Valley Business Estate, Newlands East, 4037, South Africa

You're also welcome to reach us through the details on our website, www.pedroschicken.co.za.