

Promotion of Access to Information Act 2 of 2000 · Section 51

PAIA manual

Dark Pools (Pty) Ltd

Registration number

2021/522920/07

Information Officer

Obedience Kuguyo

Compiled

11 October 2026

About this manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 for Dark Pools (Pty) Ltd, registration number 2021/522920/07. Compiled on 11 October 2026.

Information Officer	Request form	If you disagree
Obedience Kuguyo obedience@darkpools.co.za +27 10 502 2552	Form 2 of the Regulations Request fee R140.00 Decision within 30 days	Complaint to the Information Regulator on Form 5, or court application, within 180 days

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1 List of acronyms and abbreviations

Dark Pools	Dark Pools (Pty) Ltd
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator of South Africa
Regulations	Regulations relating to the Promotion of Access to Information, GN R757 of 27 August 2021

2 Purpose of this manual

This manual is useful for the public to:

- Check the categories of records held by Dark Pools that are available without a person having to submit a formal PAIA request.
- Understand how to make a request for access to a record of Dark Pools.
- Know the description of the records of Dark Pools that are available in accordance with any other legislation.
- Access all the relevant contact details of the Information Officer, who will assist the public with the records they intend to access.
- Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- Know whether Dark Pools processes personal information, the purpose of the processing, the categories of data subjects and information, the recipients, any planned transborder flows, and the security measures that protect it.

3 Key contact details for access to information of Dark Pools (Pty) Ltd

Information Officer	Obedience Kuguyo
Email	obedience@darkpools.co.za
Telephone	+27 10 502 2552
Deputy Information Officer	None designated. Requests are handled by the Information Officer.
General contacts	www.darkpools.co.za/contact
Head office	Georgestraat 89, Suite 2172, 7140 Kaapstad, Western Cape, South Africa
Website	www.darkpools.co.za

4 Guide on how to use PAIA and how to obtain access to the guide

The Regulator has updated and made available the guide on how to use PAIA, which explains how to exercise the rights in PAIA and POPIA. The guide is available in each of the official languages and in braille, on the Regulator's website, and from the Regulator on request using Form 1 of the Regulations.

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 (toll-free 0800 017 160)
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

A copy of the guide is also available from our Information Officer on request.

5 Categories of records available without a person having to request access

The following records are available on our website, free of charge, without a formal request:

- Information about our products, services, clients and offices
- The company profile and capability statements
- The company details of the Dark Pools companies
- The privacy notice
- The website terms of use
- This PAIA manual
- Articles, the glossary and sample reports

6 Records available in accordance with other legislation

Where applicable to its operations, Dark Pools keeps records in terms of the following legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

7 Subjects on which Dark Pools holds records and categories of records held

Subject	Categories of records
Company secretarial	Incorporation documents, memorandum of incorporation, securities register, minutes and resolutions, and statutory returns.
Finance and tax	Accounting records, annual financial statements, tax returns and assessments, invoices and banking records.

Subject	Categories of records
Human resources	Employment contracts, payroll and benefits records, leave, training and disciplinary records, and employment equity and skills development records.
Clients	Proposals, agreements, statements of work, project records, correspondence and enquiry records.
Suppliers and partners	Supplier and partner agreements, procurement records and correspondence.
Products and intellectual property	Software, source code, product documentation, designs and related intellectual property records.
Information technology and security	System and access logs, security policies and procedures, and incident records.
Marketing and communications	Website content, published documents, articles and social media content.

Listing a category does not mean access to every record in it will be granted. Access is subject to the grounds for refusal in PAIA.

8 Processing of personal information

Purpose of processing

- To respond to enquiries and arrange meetings.
- To provide our products and services under our agreements with clients.
- To manage employment and engagements with employees, contractors, suppliers and partners.
- To meet our obligations under tax, company, labour and other law.
- To keep our website and systems secure.
- To understand how our website is used, with the visitor's consent where cookies are involved.

Categories of data subjects and their personal information

Data subjects	Personal information
Website enquirers	Name, email address, phone number, job title, organisation, sector, country, message, the page the enquiry was sent from and first arrived on, the referring website, the country of the connection and the browser type.
People booking meetings	Name, email address, organisation, the topic of the meeting and any notes.
Client and prospect contacts	Names, roles, contact details and correspondence.
Employees, contractors and applicants	Identity and contact details, qualifications, employment, payroll, banking and tax details, and employment equity information.
Suppliers and partners	Company details, contact people, banking details and agreements.

Where we process personal information on behalf of clients in delivering our products and services, we do so as an operator, under the client's instructions and the agreement with that client.

Recipients or categories of recipients

- Service providers that host or support our systems: Cloudflare (website hosting, enquiry storage and email delivery), Microsoft (email, calendar and Teams meetings), Calendly (meeting bookings) and Google (website analytics, only with the visitor's consent).
- Professional advisers, including auditors, accountants and legal advisers.
- The South African Revenue Service and other authorities, where the law requires it.
- Banks and payment providers, to make and receive payments.
- Our related companies, Dark Pools AI Corporation in the United States and Dark Pools Eswatini (Proprietary) Limited, where needed to deliver products and services to clients.

Planned transborder flows of personal information

Some of the service providers above, and our related companies, process information outside South Africa, including in the United States, the European Union and Eswatini. We transfer personal information across borders only as section 72 of POPIA allows, for example where the recipient is bound by law, binding rules or an agreement that provides an adequate level of protection.

Security measures

- Access to personal information is limited to the people who need it for their work, and they are bound by confidentiality.
- Our website uses encrypted connections (HTTPS with HTTP Strict Transport Security), a content security policy, bot protection and rate limiting on its forms.
- Enquiry records are stored in access-controlled systems, and changes to our systems are logged.
- We review our safeguards against reasonably foreseeable risks and respond to security incidents as POPIA requires.

9 How to request access to a record

- Complete Form 2 (Request for access to record) of the Regulations, available from the Regulator's website, and send it to the Information Officer by email or deliver it to our head office.
- Give enough detail to identify the record and yourself, state the form of access you want, and, if you request the record on behalf of someone else, the capacity in which you do so.
- Pay the request fee. If a search will take more than six hours, we will tell you on Form 3 and ask for a deposit before we proceed.
- We will decide on your request within 30 days of receiving it. We may extend this once by up to 30 days in the circumstances PAIA allows, and will tell you within the first 30 days. If we do not decide in time, your request is regarded as refused.
- Access may be refused only on the grounds in Chapter 4 of Part 3 of PAIA, which include protecting the privacy of others, commercial information of third parties and of Dark Pools, confidential information, the safety of individuals and property, and records privileged from production in legal proceedings.
- You may ask for your own personal information, and for it to be corrected or deleted, under sections 23 and 24 of POPIA.

10 Fees

The following fees apply to requests to private bodies under the Regulations (GN R757 of 27 August 2021):

Item	Fee
Request fee, payable by every requester	R140.00
Photocopy or printed black-and-white copy of an A4 page	R2.00 per page or part of a page
Printed copy of an A4 page	R2.00 per page or part of a page
Copy in computer-readable form on a flash drive or compact disc supplied by the requester	R40.00
Copy in computer-readable form on a compact disc supplied to the requester	R60.00
Transcription or copy of visual images	The service provider's quotation
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on a flash drive or compact disc supplied by the requester	R40.00
Copy of an audio record on a compact disc supplied to the requester	R60.00
Search and preparation of the record for disclosure, for each hour or part of an hour after the first hour	R145.00, up to a maximum of R435.00
Deposit, where the search will take more than six hours	One third of the access fee
Postage, email or other electronic transfer	Actual expense, if any

A deposit is refunded if access is refused.

11 Remedies

Dark Pools has no internal appeal procedure. If you are not satisfied with our decision on your request, including a decision about fees, a deposit, an extension or the form of access, you may lodge a complaint with the Information Regulator on Form 5 within 180 days of the decision, or apply to a court within 180 days, as provided in sections 77A and 78 of PAIA.

12 Availability of the manual

- On our website, as a web page and as a PDF download.
- At our head office, for public inspection during normal business hours.
- To any person on request, on payment of the fee for a copy (R2.00 per A4 page).
- To the Information Regulator on request.

13 Updating of the manual

The head of Dark Pools will update this manual on a regular basis and whenever a material change occurs. This version was compiled on 11 October 2026.

ISSUED BY

Obedience Kuguyo, Information Officer
Dark Pools (Pty) Ltd

DATE

11 October 2026