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DARKTRACE

PAIA MANUAL

Darktrace South Africa (Pty) Ltd

Last updated 16th April 2026

1. Introduction and Purpose

This Promotion of Access to Information Act (“PAIA”) Manual has been prepared by Darktrace South Africa Proprietary Ltd (“Darktrace SA” or “the Company”) in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), read together with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

This Manual is intended to:

- Promote transparency and accountability within Darktrace SA;
- Provide information regarding the categories of records held by the Company;
- Describe the procedure for requesting access to records held by the Company; and;
- Outline the Company’s approach to the processing of personal information in accordance with POPIA.

This Manual is intended to comply with the minimum statutory requirements under PAIA and POPIA. It does not constitute a contractual undertaking by the Company. Any rights not expressly recorded herein remain governed by applicable legislation.

2. Definitions and Acronyms

Term	Definition
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013
Information Officer (IO)	The person designated in terms of PAIA and POPIA
Deputy Information Officer (DIO)	A person designated to assist the Information Officer

Information Regulator	The Information Regulator of South Africa
The Company	Darktrace South Africa Proprietary Ltd

3. Details of the Company

Registered Name: Darktrace South Africa Proprietary Ltd

Registration Number: 2016/255927/07

Registered Address: Oakdene House – 229 Carina Street, Waterkloof Ridge, Pretoria, Gauteng, 0181

Office Address: DP World Wanderers Stadium, Corlett Drive, Illovo, Johannesburg, 2196

Website: <https://www.darktrace.com>

4. Information Officer and Contact Details

Information Officer

Name: Amabel Evans

Title: VP, Legal & Deputy Company Secretary **Email:**

amabel.evans@darktrace.com

Deputy Information Officer **Name:**

Iain Pye

Title: Head of Risk & Privacy

Email: iain.pye@darktrace.com

PAIA Requests Contact

Email: Co-sec@darktrace.com

5. Guide On How to Use PAIA

The Information Regulator has, in terms of section 10 of PAIA, published a Guide on how to use PAIA. The Guide is available:

- From the Information Regulator's website: <https://justice.gov.za/inforeg/>;
- For inspection at the offices of the Information Regulator; or
- Upon the request from the Company's Information Officer

6. Categories of Records Available without a Formal PAIA Request

The following categories of records may be accessed without submitting a formal PAIA request:

- This PAIA Manual;
- Privacy and data protection notices published by Darktrace;
- Information published on the Darktrace website;
- Publicly available corporate information; and
- Publicly available recruitment and vacancy information

7. Records Available in Terms of Other Legislation

Term	Definition
Memorandum of Incorporation	Companies Act 71 of 2008
Statutory company records	Companies Act 71 of 2008
PAIA Manual	PAIA

Data protection documentation	POPIA
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8. Description of Records held by the Company

Darktrace SA holds records in respect of the following subject areas:

Human Resources

- Employment contracts;
- Personnel and payroll records;
- Recruitment and training documentation.

Finance

- Accounting and financial records;
- Tax and statutory filings;
- Payment and invoicing records.

Corporate and Legal

- Company secretarial records;
- Governance and compliance documentation;
- Regulatory correspondence.

Information Technology and Security

- System access and usage records;
- Information security and monitoring records.

Operations and Research

- Internal operational reports;
- Technical and research documentation.

9. Processing of Personal Information

9.1 General Principles

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Personal information is processed by Darktrace SA lawfully, fairly, and transparently, and only to the extent necessary to fulfill legitimate business purposes and statutory obligations. The Company endeavours to ensure that personal information is accurate, complete and safeguarded against unauthorised access, loss or disclosure.

9.2 Purpose of Processing

The Company processes personal information for purposes including:

- Recruitment and employment administration;
- Management of employment relationships
- Compliance with legal and regulatory obligations;
- Information security, access control and system administration;
- Internal operations and corporate governance; and
- Support of Darktrace business activities

9.3 Categories of Data Subjects

- Employees and contractors;
- Job applicants;
- Customers and prospective customers;
- Business partners and service providers;
- Website and office visitors

9.4 Categories of Personal Information

- Identity and contact information;
- Recruitment and employment information;
- Technical and usage information
- Marketing and communications information

9.5 Recipients of Personal Information

Personal information may be disclosed, where appropriate, to:

- Other companies within Darktrace group;
- Third-party service providers acting on behalf of Darktrace;
- Professional advisers, auditors and legal counsel; and
- Regulatory of law enforcement authorities where requires by law.

9.6 Transborder Flows of Personal Information

As part of a global group, personal information may be transferred outside the Republic of South Africa to Darktrace group entities and service providers located in jurisdictions such as

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the United Kingdom and the European Union, subject to appropriate safeguards consistent with POPIA.

9.7 Security Measures

Darktrace SA maintains appropriate administrative, technical and organisational measures to protect personal information, including access controls, security policies, training and incident response procedures.

10. Request Procedure for Access to Records

Requests for access to records must be submitted in writing to the Information Officer in the prescribed form and must comply with the procedural requirements set out in the PAIA.

The Company is not obliged to create or compile new records in response to a PAIA request.

Access to records may be refused on the grounds set out in Chapter 4 of PAIA, and each request will be assessed on its own merits.

PAIA requests are distinct from requests made by data subjects in terms of POPIA.

11. Fees

Fees for access to records are payable in accordance with the regulations published under PAIA. Details regarding applicable fees may be obtained from the Information Officer.

12. Availability of this Manual

This Manual is available:

- on the Darktrace website;
- as the Company's principal place of business for inspection during normal business hours;
- upon request from the Information Officer, subject to payment of a prescribed fee; and
- to the Information Regulator upon request.

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Updating of the Manual

This Manual will be reviewed and updated by the Information Officer from time to time to ensure ongoing compliance with PAIA, POPIA and other applicable legislation.