



THE PORTAL GENIE PLATFORM PRIVACY POLICY

(Including Cookies)

Effective Date: 10 November 2025

Controller/Operator: Nagging Panda FZCO (Dubai Silicon Oasis, UAE) (“**Nagging Panda**”, “**we**”, “**us**”, “**our**”)

Platform: The Portal Genie website, software platform, and mobile application (the “**Platform**”).

1. Introduction

Welcome to **The Portal Genie**. We value your trust and are committed to protecting your personal information.

This Privacy Policy explains:

- What information we collect and how we collect it;
- How and why we use and share that information;
- The choices and rights you have regarding your data; and
- How we safeguard your information.

Our Privacy Policy is guided by applicable **Data Protection and Privacy Laws**, including POPIA (South Africa), GDPR (EU/UK), and equivalent global standards.

For any privacy-related queries, contact us at privacy@naggingpanda.com.

2. Scope and Application

This Policy applies to all users accessing or using the Platform or related services (the “**Services**”). It forms part of the **Terms & Conditions** available at www.theportalgenie.com/terms.



By accessing the Platform, you consent to this Privacy Policy and to the processing of your Personal Data as described herein.

3. Information We Collect

We collect and process the following categories of information:

3.1. Information You Provide

- Your name, email address, phone number, and company details;
- Client and customer names, contact details, and related data you upload or connect;
- Transactions and documents on the Platform;
- Information entered into your Portal, Billboard, or Notifications;
- Billing, payment, and subscription details;
- Any communications or support queries submitted to us.

3.2. Information Collected Automatically

- Usage data such as IP address, browser type, device type, operating system, and access times;
 - Log data and metadata relating to actions performed on the Platform;
 - Cookie data, as described below.
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4. Cookies and Similar Technologies

We use **Cookies** and similar tracking technologies to:

- Recognize and remember your preferences, device type, and location;
- Improve performance and functionality of the Platform;
- Enable integrations with third-party services; and
- Deliver relevant, interest-based advertising (where lawful).

You can adjust cookie settings in your browser at any time. Essential cookies required for system operation cannot be disabled.

Further details are available on our website at www.theportalgenie.com/cookies.

5. How We Use Your Information



We use your information to:

1. Provide, maintain, and improve the Platform and Services;
2. Authenticate users and manage secure OTP-based access;
3. Process transactions and communicate with you about your account;
4. Respond to support requests and service inquiries;
5. Comply with legal obligations and enforce our Terms & Conditions; and
6. Send operational or promotional updates (only where permitted and unsubscribed).

We will **never sell or rent** your Personal Data to third parties.

6. Data Storage and Security

We store and process Personal Data using the same technical and organizational measures we apply to protect our own confidential information. These include:

- Encryption of data in transit and at rest;
- Controlled access and authentication;
- Regular system monitoring and vulnerability testing; and
- Secure, compliant cloud-based infrastructure.

Data may be processed on servers located outside your jurisdiction. By using the Platform, you consent to such cross-border transfers, provided that equivalent data-protection standards are applied.

7. Retention and Deletion

We retain Personal Data only for as long as necessary to:

- Provide the Services;
- Fulfil contractual or legal obligations; or
- Comply with retention requirements under applicable law.

If you terminate your account, you may:

- **Request deletion** of your Personal Data (permanent and unrecoverable); or
- **Allow retention** for easy reactivation later.

We will delete all data upon request, subject to lawful retention obligations.

8. Legal Basis for Processing

Depending on your jurisdiction, processing is based on:

- Your **explicit consent** (for data entered or shared by you);
- **Contractual necessity** (to deliver Services you requested);
- **Legal obligation** (to comply with statutory requirements); or
- **Legitimate interests** (to operate, secure, and improve the Platform).

9. Sharing and Transfers

We may share Personal Data only:

- With service providers or subprocessors assisting in delivering the Services (e.g., hosting, communication, analytics);
- With partners or third parties when you authorise integrations (e.g., accounting software);
- When required by law, court order, or regulatory authority;
- To protect rights, property, or safety of The Portal Genie, our users, or others.

All third-party processors are bound by confidentiality and data-protection obligations equivalent to ours.

10. Your Responsibilities

You are responsible for ensuring that all Personal Data you submit or upload to the Platform:

- Has been lawfully obtained;
- Is accurate and complete; and
- Complies with all applicable privacy and data-protection laws.

You must obtain informed consent from your clients or customers where required.



Failure to do so may result in suspension or termination of your access, and you will indemnify **The Portal Genie** and **Nagging Panda** against any resulting claims.

11. Your Rights

Depending on your jurisdiction, you may have the right to:

- Access a copy of your Personal Data;
- Request correction or deletion;
- Object to processing or withdraw consent;
- Request data portability (where technically feasible).

To exercise these rights, contact privacy@naggingpanda.com.

12. International Data Transfers

The Platform is operated globally. Your information may be transferred to and processed in countries outside your own, including by third-party service providers. We ensure that adequate safeguards and legal mechanisms (such as contractual clauses or adequacy decisions) protect your Personal Data during such transfers.

13. Updates to This Policy

We may amend this Privacy Policy from time to time to reflect operational or legal changes.

The updated version will be posted on www.theportalgenie.com with the “Effective Date” revised accordingly. Continued use of the Platform after updates constitutes acceptance of the revised Policy.

14. Contact Us

For questions, complaints, or privacy-related requests, please contact:

Email: privacy@naggingpanda.com

Website: www.theportalgenie.com

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