

# **Privacy Policy of Rome Invicta (Pty) Ltd**

**Effective Date:** 24 November 2025

**Last Updated:** 24 November 2025

## **1. Introduction**

**Rome Invicta (Pty) Ltd** (“we,” “our,” or “us”) values your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, store, and share information when you access or use our Platform and Services. By using the Platform, you consent to the practices described in this Policy.

## **2. Information We Collect**

We may collect the following types of information:

- **Account Information:** Name, email address, and other details provided during registration.
- **Payment Information:** Processed securely through trusted third-party providers; we do not store full payment details.
- **User Content:** Entries in the Black Book, financial tracker inputs, or other data you submit.
- **Technical Data:** Device information, IP address, browser type, and usage logs.
- **Communications:** Records of interactions with our support team or consultants.

## **3. How We Use Information**

We use personal information to:

- Provide and improve Services.
- Manage subscriptions and one-time purchase packages.
- Communicate with Users regarding accounts, purchases, or updates.
- Ensure compliance with legal obligations.
- Protect the integrity and security of the Platform. Processing is carried out on lawful bases including contract performance, legal obligation, consent, and legitimate interest, as applicable.

## **4. Sharing of Information**

We do not sell personal data. Information may be shared only in the following circumstances:

- **Service Providers:** With trusted third-party providers (e.g., payment processors, hosting services) to deliver Services.
- **Legal Requirements:** Where disclosure is required by law, regulation, or court order.

- **Protection of Rights:** To safeguard the rights, property, or safety of **Rome Invicta (Pty) Ltd**, our Users, or the public.
- **Cross-Border Transfers:** Where data is transferred outside South Africa, appropriate safeguards (such as contractual clauses or equivalent protections) will be applied.

## **5. Data Security**

We implement reasonable technical and organizational measures to protect personal data against unauthorized access, loss, or misuse. However, no system is completely secure, and Users acknowledge that they provide data at their own risk.

## **6. User Rights**

Depending on jurisdiction, Users may have rights to:

- Access, correct, or delete their personal data.
- Restrict or object to certain processing activities.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with a relevant supervisory authority (e.g., Information Regulator in South Africa, Data Protection Authority in the EU).
- Requests to exercise these rights can be submitted to us.

## **7. Data Retention**

We retain personal information only as long as necessary to provide Services, comply with legal obligations, resolve disputes, and enforce agreements. User Content may be deleted upon account termination, subject to applicable laws.

## **8. International Users**

Users outside South Africa acknowledge that their data may be transferred to and processed in South Africa or other jurisdictions where our service providers operate. We ensure that such transfers comply with applicable data protection laws and include appropriate safeguards.


## **9. Changes to This Policy**

We reserve the right to update or modify this Privacy Policy at any time. Where material changes are made, we will provide reasonable notice via email or Platform notification. Continued use of the Platform after changes have been posted constitutes acceptance of the revised Policy. Users are encouraged to review this page periodically.

## **10. Contact Information**

For questions or concerns about this Privacy Policy or data practices, please contact:

### **Rome Invicta (Pty) Ltd**

 Email: [Insert Contact Email]