Privacy Policy – Protection of Personal Information Act (POPIA)

Last Updated: October 02, 2025

Torn Express ("we", "us", or "our") operates the website tornexpress.co.za (the "Site"). We are committed to protecting your privacy and ensuring that your personal information is collected, used, stored, and disclosed in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and other applicable South African data protection laws. This Privacy Policy explains how we handle your personal information when you use our Site, particularly in relation to authentication and services connected to the Torn online game.

By accessing or using the Site, you consent to the practices described in this Privacy Policy. If you do not agree, please do not use the Site. We may update this policy from time to time, and changes will be posted here with the updated date.

About TornExpress

Torn Express is a South African-based online platform providing tools and services for users of the Torn game, including secure login via Torn API integration. We act as the "Responsible Party" under POPIA for the personal information we process.

The Information We Collect

We collect personal information directly from you and through automated means to enable secure authentication and personalized services. "Personal information" means information relating to an identifiable, living natural person or, where applicable, an identifiable juristic person, as defined under POPIA.
Tornexpress.co.za DOES not store Real life information on any person unless the PlayerName on Torn.com happens to be the Real World name of person.

Information You Provide

- **API Key**: Your Torn API key, which you submit during login. This is sanitised (alphanumeric only, limited to 100 characters) for security.
- **Derived User Data**: Once validated via the Torn API, we collect:
  - Player name as per torn player name
  - Player ID as per torn IP
  - Level
  - Gender
  - Status (e.g., state/description)
  - Faction ID and name
  - Estimated battle stats
  - Access level and type

This data is necessary for account creation, session management, and providing Torn-related features. We do not collect sensitive information (e.g., racial or ethnic origins, political beliefs) unless explicitly provided and consented to.

Information Collected Automatically

- **Log Files**: IP address, browser type, internet service provider (ISP), referring site, pages visited, date/time of visits, and session duration.
- **Cookies**: We use essential cookies for authentication if you select "Remember Me" during login:

These cookies are secure (HTTPS only), HTTP-only, and set with SameSite=Strict to prevent cross-site attacks. We do not use cookies for advertising or non-essential tracking.

We inform you at the point of collection what data is required (e.g., API key for login) and what is optional.

How We Use Your Information

We process your personal information only for lawful purposes and on a legal basis under POPIA, such as:

- **Consent**: By submitting your API key, you consent to its processing for authentication.
- **Contract Performance**: To fulfill our services, like validating your Torn access and storing session data.
- **Legitimate Interests**: To improve Site security, detect fraud, and maintain user accounts.
- **Legal Obligations**: For compliance with laws or disputes.

Specific uses include:

- Authenticating and verifying your identity via Torn API.
- Creating and updating user profiles in our secure database.
- Providing personalized Torn game tools and features.
- Preventing unauthorized access (e.g., checking blacklists).
- Internal analytics for service improvement (anonymized where possible).
- Responding to legal requests or protecting our rights.

We will not use your information for unsolicited marketing without separate consent.

Disclosure of Your Information

We do not sell, rent, or share your personal information with third parties for their own purposes. Disclosures are limited to:

- **Service Providers**: The Torn API (api.torn.com) for validation; our hosting and database providers under strict confidentiality agreements compliant with POPIA.
- **Legal Requirements**: To authorities if required by law, court order, or to protect rights/safety.
- **Business Transfers**: In case of merger or acquisition, data may transfer with safeguards.

All recipients are bound by equivalent privacy protections.

Information Security

We implement reasonable technical and organizational measures to protect your personal information against loss, misuse, unauthorized access, disclosure, alteration, or destruction. This includes:

- Secure locks (e.g., CFLOCK in our systems) for session data.
- Encryption for cookies and API transmissions (HTTPS).
- Access controls on a need-to-know basis for our team.
- Regular security reviews and updates.

Data is stored on secure South African servers, but no internet transmission is 100% secure—we cannot guarantee absolute protection. In the unlikely event of a breach, we will notify affected users and the Information Regulator as required by POPIA.

Data Retention and Storage

We retain personal information only as long as necessary for the purposes outlined or as required by law (e.g., 14 days for trade validity in our system). Cookies expire after 30 days. User profiles are kept while your account is active; upon deletion request, data is securely erased or anonymized. We may retain logs for up to 12 months for security/audit purposes.

Data may be transferred or stored outside South Africa (e.g., to Torn servers), but only with adequate safeguards like standard contractual clauses.

Your Rights Under POPIA

You have rights regarding your personal information, including:

- **Access**: Request confirmation of whether we hold your data and a copy (subject to a reasonable fee).
- **Correction**: Update or correct inaccurate/incomplete data.
- **Deletion**: Request erasure ("right to be forgotten") where no longer needed or consent withdrawn.
- **Objection/Restriction**: Object to processing based on legitimate interests; restrict processing in certain cases.
- **Portability**: Receive your data in a structured format.
- **Withdraw Consent**: At any time, though this may limit Site functionality.
- **Opt-Out of Marketing**: Not applicable here, but available if we introduce it.

To exercise these rights, contact us (details below) with proof of identity (e.g., ID copy). We respond within a reasonable time (typically 30 days). If unsatisfied, complain to the Information Regulator at complaints@justice.gov.za or inforeg@justice.gov.za.

Children's Privacy

Our Site is not intended for children under 18. We do not knowingly collect data from minors without parental consent.

Changes to This Policy

We may update this policy to reflect changes in our practices or law. Continued use after updates constitutes acceptance. Check this page periodically.

How to Contact Us

For questions, rights requests, or concerns:
Email: info@tornexpress.co.za

We have appointed an Information Officer responsible for POPIA compliance—contact them via the above.

This policy ensures balanced protection of your privacy while enabling our services.