

# Privacy & Data Protection Policy

Last updated: 25 July 2025

## 1. Introduction

This Privacy Policy explains how Directory Today (operated by House of Seraphim Ltd, hereinafter "the Company") collects, uses, and protects your personal data. All digital and personal data assets may also be held or assigned to The Seraphim House Trust ("the Trust") for lawful administration under private trust governance.

This policy applies to all users of the Directory Today platform and is written to comply with applicable data protection laws, including the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

## 2. Data Controller & Hosting

The Company is the primary data controller. Our servers are hosted in the Netherlands (EU), and data is processed in accordance with EU/UK laws.

## 3. What We Collect

We may collect the following:

- Name, contact details, username, and password
- Content you upload (e.g., listings, photos, descriptions)
- IP address, browser/device type, location data
- Consent records, preferences, and communications
- Usage data and interaction logs

## 4. Lawful Basis for Processing

We process data on the basis of:

- Your explicit consent
- Performance of a contract (e.g., for listing your profile)
- Legal obligations
- Legitimate interests (e.g., to improve the platform)

## 5. Age Restriction

This platform is strictly for users aged 18 or older. By using the site, you confirm you are of legal age in your jurisdiction.

## 6. How We Use Your Data

Your data may be used to:

- Create and manage your account
- Display listings and content publicly
- Provide support and updates
- Improve services and monitor compliance
- Enforce our Terms & Conditions

## 7. Data Sharing & Assignment

Data may be shared with:

- Platform service providers (e.g., hosting, analytics)
- Legal authorities if required
- The Seraphim House Trust for lawful administration, valuation, or asset protection

We do not sell personal data to third parties.

## 8. Cookies & Tracking

We may use cookies and similar technologies to enhance user experience and gather usage data.

You can manage cookie preferences via your browser.

## 9. International Transfers

Where necessary, data may be transferred outside the UK/EU in compliance with applicable data protection safeguards, including standard contractual clauses (SCCs) or reliance on adequacy decisions.

## 10. Your Rights

Under data protection law, you have the right to:

- Access your data
- Rectify inaccuracies
- Request erasure (right to be forgotten)
- Restrict or object to processing
- Withdraw consent at any time
- Lodge complaints with a supervisory authority

## 11. Data Security

We take data security seriously. Your information is protected using appropriate technical and organizational measures to prevent unauthorized access, loss, or misuse.

## 12. Retention

We retain personal data only as long as needed for the purposes outlined or to meet legal/regulatory obligations.

## 13. Updates

We may update this Privacy Policy at any time. Continued use of the platform implies agreement

with the latest version.

#### 14. Contact

For all data-related inquiries or concerns, contact:

House of Seraphim Ltd

Email: [contact@ai-access-initiative.org](mailto:contact@ai-access-initiative.org)

Registered in England & Wales

Assets held by: The Seraphim House Trust