SECCIØN

OPERATING ENTITY & LSSI-CE DISCLOSURE

SEC-PRIV-2026 | v2.8.4 | EN

Effective Date: **2026-11-15**

PRIVACY POLICY

We protect your personal data, face, and preferences with high security and GDPR standards.

DATA CONTROLLER

SECCION AI CONCEPT S.L. · NIF/CIF: B05765441

Registered Office: Calle Ingeniero Canales 4, Oficina 1B, 03013 Alicante, Spain
Commercial Registry: Registro Mercantil de Alicante (Tomo 4486, Hoja A 208743)
Data Protection Officer (DPO): dpo@seccion.ai

1. SENSITIVE DATA COLLECTION & EXPLICIT OPT-IN

MAGIC TRANSLATION (TL;DR)

We collect details about who you are, what you like, and your location to power our matchmaking and creator interactions. We will never process this without your clear, active opt-in. No pre-ticked boxes, no hidden terms. You are in control of your vibes.

LEGAL TERMS

The Platform processes sensitive personal data, including sexual orientation, relationship preferences, location data, and communication records. In accordance with Article 9 of the GDPR, the processing of this "special category" data requires your explicit, freely given, specific, informed, and unambiguous consent.

- **Mechanism:** You must complete a manual, unticked opt-in checkbox during onboarding.
- **Consent Records:** We maintain secure, auditable logs of your consent timestamps and parameters to comply with AEPD (Agencia Española de Protección de Datos) requirements.
- **Right to Withdraw:** You have the right to withdraw your consent at any time, which can be done via your Account Settings or by requesting account deletion.

2. BIOMETRIC DATA & AGE VERIFICATION

MAGIC TRANSLATION (TL;DR)

To keep the community safe, real, and 18+, we use a quick selfie check. AI estimates your age from a live snap and immediately deletes it. If you're a member, we do not store your government ID on our servers. Biometric template matches keep catfish and bots out of Co-Op Mode.

LEGAL TERMS

Biometric data (e.g., facial templates extracted from verification selfies) is classified as special category data under the GDPR.

- **Age Estimation:** During onboarding, users upload a live liveness-verified selfie. Third-party age estimation AI estimates eligibility (18+). The selfie image is processed in memory and deleted immediately (within 5 seconds) after the age estimation is complete (Data Minimization).
- **Anti-Catfishing Profile Verification:** The Platform compares the biometric template of your liveness selfie against your uploaded profile photos using facial matching. The mathematical facial templates are stored in an encrypted database and are deleted immediately upon account termination.
- **Biometric Consent:** A dedicated, explicit consent checkbox is mandatory before biometric scans are initiated.

3. AUTOMATED DECISION-MAKING & RECOMMENDER SYSTEMS

MAGIC TRANSLATION (TL;DR)

Our Synergy Engine runs matching algorithms based on archetype chemistry, location, and lifestyle sync to suggest connection cards. Under the hood, this is automated, but you always have the right to challenge the algorithm or request a human coach to review it.

LEGAL TERMS

Under Article 22 of the GDPR and Article 27 of the DSA, we disclose the use of automated profiling and matchmaking:

- **The Synergy Algorithm:** Matches are calculated using lifestyle preferences, archetype alignment, and location proximity. These scores determine profile visibility and ranking.
- **Transparency:** We provide clear explanations of the matching logic upon request.
- **Human Intervention:** Users have a legal right to challenge automated decisions (such as compatibility ratings or automated safety flags) and request a manual review by a human moderator.

4. TECHNICAL SECURITY & DATA BREACH NOTIFICATIONS

MAGIC TRANSLATION (TL;DR)

We encrypt your data at rest and in transit, using strict access rules to lock down sensitive information. If a data leak ever happens, we will notify the Spanish AEPD and you within 72 hours with full details and next steps.

LEGAL TERMS

We implement robust Technical and Organizational Measures (TOMs) to secure your data:

- **Encryption:** All personal and behavioral data is encrypted in transit using TLS 1.3 and at rest using AES-256 encryption.
- **Access Control:** We enforce the principle of least privilege, requiring multi-factor authentication (MFA) for all administrative access.
- **Data Breach Protocols:** In the event of a physical or technical data breach, we will notify the Spanish Supervisory Authority (AEPD) within 72 hours of discovery. If the breach poses a high risk to user privacy or safety, we will notify the affected individuals directly and without undue delay.

5. MEMBER VERIFICATION & EU WALLET STANDARDS

MAGIC TRANSLATION (TL;DR)

We prove you are 18+ using cryptographic verification without hoarding sensitive ID documents on platform servers, and ephemeral media disappears cleanly from active memory.

LEGAL TERMS

We implement a privacy-centric age check that confirms you are 18 or older without storing your personally identifiable information (PII):

- **Zero-Knowledge Proofs (ZKP):** We integrate with accredited identity providers supporting the European Commission's open-source age-verification blueprint.
- **Selective Disclosure:** The system requests a simple cryptographic proof (e.g., IsOver18: True) from your EU Digital Identity Wallet. We do not receive or store your name, exact date of birth, or address.
- **Ephemeral Media Security:** All disappearing photos, videos, and voice notes shared in chat are processed in volatile memory. They are immediately wiped and deleted from our active cache once viewed or after expiration, ensuring your private exchanges remain secure.

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