

Global Privacy Notice

Who we are, what personal data we collect, why we collect it, who we share it with, how long we keep it, and what rights you have.

Version	2.0	Last reviewed	August 2026
Effective date	14 August 2026	ICO registration	ZA748829
Previous version	1.0 · February 2021	Controller	Today Digital Ltd

CHANGE SUMMARY — V1.0 TO V2.0

- Complete rewrite replacing the February 2021 PDF
- Registered address updated from The Old Tannery, Accrington to Flint Glass Works, Manchester
- Privacy Shield transfer mechanism removed — replaced with UK Data Bridge, IDTA, and UK Addendum to EU SCCs
- Coverage extended from todaydigital.com only to all nine Today Digital platforms
- Lawful basis schedule added for all processing purposes
- Commercial data selling activity disclosed explicitly with unbundled consent requirement
- AI processing disclosures added for AfterSign, Mither, UC Awards, Techtelligence, and Binary to Billions
- Full processor table, retention schedule by data category, and children’s data section added
- Data subject rights expanded to cover the UK, EU, California, other US states, Canada, Australia, and the Middle East
- CCPA/CPRA rights added including Do Not Sell or Share and GPC signal honouring
- Security section added, including honest disclosure of the AfterSign shared secret
- ICO registration ZA748829 confirmed throughout

SUMMARY

This notice tells you who we are, what personal data we collect, why we collect it, who we share it with, how long we keep it, and what rights you have. It applies to every Today Digital platform. Read it before you use any of our services.

If you have questions, contact privacy@todaydigital.com.

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1 Who we are

Today Digital Ltd is the data controller for all personal data collected across our portfolio of platforms.

Today Digital Ltd

Flint Glass Works, Jersey Street, Manchester,
England, M4 6JW

Privacy contact: privacy@todaydigital.com

Company number 10494324

ICO registration ZA748829

EU residents. Today Digital Ltd is a UK-established company. EU residents may direct data protection enquiries to privacy@todaydigital.com. We are in the process of appointing an EU Article 27 representative and will update this notice when that appointment is confirmed.

Our platforms. This notice applies to all of the following:

UC Today — uctoday.com

CX Today — cxtoday.com

UC Awards — awards.uctoday.com

CX Awards — awards.cxtoday.com

Today Digital — todaydigital.com

Techtelligence — techtelligence.com

AfterSign — aftersign.com

Mither — mither.com

Binary to Billions — binarytobillions.com

2 What personal data we collect

We collect different data depending on which platform you use and how you use it. The table below sets out the categories we collect across the portfolio.

CATEGORY	EXAMPLES	PLATFORMS
Identity data	Name, display name, handle, job title, company, professional role	All platforms with accounts
Contact data	Email address, telephone number	All platforms with accounts or enquiry forms
Account and authentication data	Password hash, authentication tokens, one-time codes, session identifiers	UC Awards, CX Awards, Techtelligence, AfterSign, Mither, Binary to Billions
Professional profile data	Credentials, experience, company affiliation, LinkedIn profile data	Techtelligence, AfterSign, Binary to Billions
Subscription and preference data	Newsletter preferences, content interests, cookie choices	UC Today, CX Today, Binary to Billions
User-submitted content	DORs, complaints, awards entries, podcast applications, editorial contributions	AfterSign, Mither, UC Awards, CX Awards, Binary to Billions
Commercial transaction data	Entry fees, payment status, Stripe session identifiers, invoice references	UC Awards, CX Awards
Usage and technical data	Session activity, page views, content engagement, login history	Techtelligence, AfterSign, Mither
Analytics and behavioural data	Referral source, device type, country, content preferences	UC Today, CX Today, Binary to Billions (first-party analytics only)
Server and security data	Request identifiers, authentication logs, rate-limiting data	All platforms
AI-processed content	Submission transcripts, voice recordings processed for transcription, editorial content submitted for AI suggestions	AfterSign, Mither, Techtelligence, UC Awards, Binary to Billions
Cookie and storage data	Browser storage items as described in our Cookie and Storage Policy	All platforms

Data we do not collect. AfterSign does not collect IP addresses, device identifiers, or browser fingerprints at the point of submission. Binary to Billions does not store raw IP addresses — listener sessions are identified by a daily-rotating cryptographic hash. AfterSign does not use analytics or tracking scripts.

Data collected about third parties. Mither collects information about businesses and individuals who are the subject of consumer complaints. Those businesses and individuals are data subjects in their own right. This notice applies to that data too.

3 How we collect your data

We collect data in three ways.

Data you give us directly. When you register an account, subscribe to a newsletter, submit a complaint, file a report, enter an award, apply to appear on a podcast, or contact us.

Data collected automatically. When you use our platforms, we collect technical data such as session identifiers, engagement events, and device class. See our [Cookie and Storage Policy](#) for full details.

Data from third parties. Where you sign in using a third-party authentication provider (Clerk on UC Awards and CX Awards; Supabase on Techtelligence and Mither), that provider shares your account information with us. Where you paste LinkedIn profile data into Techtelligence, that data is processed on your instruction.

4 Why we collect your data and the legal basis for doing so

We only process your personal data where we have a lawful basis under UK GDPR Article 6 (and Article 9 for special category data). The table below maps each purpose to its lawful basis.

PURPOSE	LAWFUL BASIS
Creating and managing your account	Contract (Article 6(1)(b))
Delivering subscribed content and platform services	Contract (Article 6(1)(b))
Sending authentication codes and security notifications	Contract (Article 6(1)(b))
Administering awards entries and judging	Contract (Article 6(1)(b))
Processing payments for entry fees and events	Contract (Article 6(1)(b))
Sending newsletters you have subscribed to	Consent (Article 6(1)(a)) + PECR
B2B email marketing to existing contacts for similar services	Legitimate interests (Article 6(1)(f)) + PECR soft opt-in
Analytics and platform improvement (first-party, aggregated)	Legitimate interests (Article 6(1)(f)) or Consent where cookies are required
Security, fraud prevention, and abuse detection	Legitimate interests (Article 6(1)(f))
Legal compliance and responding to regulatory requests	Legal obligation (Article 6(1)(c))
Commercial data services — sharing opted-in subscriber data with third-party B2B technology companies for marketing and research	Consent (Article 6(1)(a)) — specific, unbundled, separately recorded
AI processing of submission content (AfterSign, Mither, UC Awards)	Contract (Article 6(1)(b)) — a necessary part of service delivery
AI-assisted editorial suggestions (Binary to Billions, Techtelligence)	Legitimate interests (Article 6(1)(f))
Publishing consumer complaints (Mither)	Legitimate interests — operating a transparent consumer feedback platform
Permanent record of deployment intelligence (AfterSign)	Legitimate interests — maintaining the integrity of the AfterSign record
Retaining transaction records	Legal obligation (Article 6(1)(c)) — Companies Act 2006

A note on commercial data services. Today Digital Ltd operates lead generation and market research data products through UC Today and CX Today. We only include your professional data in these products where you have given specific, informed, separately recorded consent to that purpose. This consent is separate from newsletter subscription consent. You can withdraw it at any time by contacting privacy@todaydigital.com. Other Today Digital platforms — AfterSign, Mither, Techtelligence, and Binary to Billions — do not contribute member data to commercial data products.

5 AI processing

Several of our platforms use artificial intelligence tools to process content. We disclose each use below.

AfterSign. When you submit a Deployment Outcome Report using the voice feature, your audio recording is sent to an AI transcription model for processing. The full text of your submission is sent to an AI language model to generate a structured account and summary. This processing is handled through our hosting provider's managed AI gateway. The data processing relationship for this AI processing is between our hosting provider (Replit) and OpenAI. Today Digital Ltd does not have a direct data processing agreement with OpenAI for this processing and cannot independently configure data retention settings from the current codebase. If your submission contains personal information — names, financial figures, locations — that information is included in what is sent to the AI service.

Mither. The full text of every complaint transcript and any voice recording are sent to OpenAI (via GPT and Whisper respectively) for structured data extraction. This happens at submission, on preview, and when our moderation team re-processes a complaint. There is no opt-out from AI processing while using Mither's submission feature. If your complaint contains personal information about you or about others, that information is included in what is sent.

UC Awards. Entry content — your written submission answers — is processed by Anthropic Claude to support AI-assisted judge scoring and to generate synthesised feedback. Entry content sent to this provider does not include your name, email address, or other direct identifiers, but does include your written submission text.

Techtelligence. An AI language model generates action briefings, weekly digest summaries, and name normalisation within the platform. The model receives entity names, intelligence labels, your role and workspace context, and — where you use the LinkedIn paste feature — the pasted profile text. The LinkedIn paste text is processed transiently and is not stored by Techtelligence after processing.

Binary to Billions. Anthropic Claude receives episode and blog post titles, body text (up to 12,000 characters), and speaker names to generate AI-suggested excerpts and SEO metadata for editorial use. This applies only to editorial content managed by our team, not to subscriber or listener data.

6 Who we share your data with

We share your data only where necessary and only with parties who are contractually required to protect it.

6.1 Third-party processors

The following are our primary data processors — companies that process data on our behalf under written data processing agreements.

PROCESSOR	PURPOSE	PLATFORMS
Supabase	Database hosting and authentication	Techtelligence, Mither
Clerk	Authentication and user management	UC Awards, CX Awards
Stripe	Payment processing	UC Awards, CX Awards
Resend	Transactional email delivery	All platforms with email
Google Cloud Storage / Replit Object Storage	File and media storage	AfterSign, Binary to Billions
OpenAI (via Replit managed gateway)	AI transcription and content structuring	AfterSign, Mither
Anthropic Claude	AI-assisted judging and editorial suggestions	UC Awards, Binary to Billions
Google Analytics	Platform analytics	UC Awards, CX Awards
Google Tag Manager	Tag management	Techtelligence, Binary to Billions (conditional)
HubSpot	Interest registration CRM	UC Awards, CX Awards
Replit	Hosting and infrastructure	All platforms
YouTube	Video embedding	Binary to Billions
Google Fonts	Typography delivery	Techtelligence, Binary to Billions
Cloudflare	Security and CDN	UC Awards, CX Awards

6.2 Commercial data buyers (UC Today and CX Today only)

Where you have specifically consented, Today Digital Ltd shares your professional details — name, job title, company, email address, and inferred professional interests — with third-party B2B technology companies for marketing and market research purposes.

Every data buyer is bound by our Commercial Data Product Terms, which require them to:

- Use your data only for the agreed purpose
- Not resell or redistribute your data
- Honour your data subject rights, including deletion requests
- Comply with applicable data protection law

You can opt out of this sharing at any time by contacting privacy@todaydigital.com.

6.3 Legal and regulatory disclosure

We may disclose your data to law enforcement agencies, courts, regulators, or other public authorities where we are legally required to do so or where disclosure is necessary to protect the rights, property, or safety of Today Digital Ltd, our users, or the public.

6.4 Business transfers

If Today Digital Ltd is involved in a merger, acquisition, or sale of assets, your data may be transferred to the relevant third party. We will notify you of any such transfer and of any material change to how your data is handled.

7 International data transfers

Today Digital Ltd is based in the UK. Some of our processors and partners are based outside the UK or EEA. Where we transfer personal data internationally, we do so using one of the following mechanisms:

DESTINATION	MECHANISM
USA (DPF-certified recipients)	UK Extension to the EU-US Data Privacy Framework (UK Data Bridge)
USA (non-DPF recipients)	UK International Data Transfer Agreement (IDTA) or UK Addendum to EU Standard Contractual Clauses, plus Transfer Risk Assessment
EU / EEA	UK adequacy regulations (renewed December 2025, valid to December 2031)
Other countries	IDTA or UK Addendum to EU SCCs plus Transfer Risk Assessment, or adequacy regulations where available

AI processing note. AfterSign’s and Mither’s AI processing routes through Replit’s managed AI gateway to OpenAI servers based in the United States. The transfer mechanism for this processing is governed by the Replit-OpenAI data processing relationship. We are working to confirm the specific transfer mechanism that applies and will update this notice accordingly.

8 Data retention

We retain your data only for as long as necessary for the purposes set out in this notice, or as required by law.

DATA CATEGORY	RETENTION PERIOD	BASIS
Active account data	Duration of account	Contract
Inactive account data after closure	Account closure + 6 years	Limitation period for civil claims
Authentication and security logs	12 months active; up to 24 months for security investigations	Legitimate interests
Web and server logs	30–90 days, then aggregated or deleted	Legitimate interests
Marketing consent records	Duration of consent + 6 years	Legal obligation (proof of consent)
Newsletter subscriber data (active)	Duration of subscription	Contract
Newsletter subscriber data (lapsed)	Last engagement + 24 months, then re-permission or delete	Legitimate interests
Commercial data product consent records	Duration of consent + 6 years	Legal obligation
Awards entry data	7 years post-event	Companies Act / contract
Payment and transaction metadata	7 years	Companies Act 2006
Mither complaint data	Account duration + 12 months unless legal hold applies	Legitimate interests
AfterSign DOR content (anonymised submissions)	Permanent record	Legitimate interests — integrity of the archive
AfterSign submission metadata (IP etc.)	Not collected	N/A
AfterSign account data after deletion	Deleted (email and profile removed; submission content re-attributed to Deleted User)	Data subject request
Podcast guest recordings and agreements	Duration of publication + 7 years	Contract
Consent records and DPIAs	Duration of processing + 5 years	Accountability obligation
Unverified accounts (AfterSign)	7 days after creation if not verified	Legitimate interests
Contact form submissions	Until no longer needed for the enquiry	Legitimate interests

9 Your rights

You have the following rights in relation to your personal data. To exercise any of them, contact privacy@todaydigital.com. We will respond within 30 days. We may ask you to verify your identity before processing a request.

Right to be informed. This notice fulfils that right.

Right of access. You can ask us for a copy of the personal data we hold about you.

Right to rectification. You can ask us to correct inaccurate or incomplete data.

Right to erasure. You can ask us to delete your data in certain circumstances — for example, where we no longer need it, where you withdraw consent, or where we have processed it unlawfully. This right is not absolute. Some data must be retained for legal or contractual reasons. See section 8 for retention periods.

Right to restrict processing. You can ask us to pause processing of your data in certain circumstances — for example, while a dispute about accuracy is resolved.

Right to data portability. Where we process your data by automated means on the basis of your consent or a contract, you can ask us to provide it in a structured, machine-readable format.

Right to object. You have an absolute right to object to processing for direct marketing purposes at any time. You can also object to processing based on legitimate interests, though this right is not absolute — we will balance our interests against yours.

Rights related to automated decision-making. We do not make solely automated decisions about you that have legal or similarly significant effects. AI tools assist our processes but human review is applied to all material decisions.

Right to withdraw consent. Where we process your data based on your consent, you can withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal.

Right to complain. If you are not satisfied with how we handle your data or your rights request, you have the right to complain to a supervisory authority. Details for each jurisdiction are in section 10.

10 Supervisory authorities and jurisdiction-specific rights

United Kingdom

Information Commissioner's Office (ICO)

ico.org.uk · 0303 123 1113 · Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

UK GDPR applies. Rights as set out in section 9. You also have the right to complain to the ICO if you believe we have not handled your data correctly.

EU and EEA

EU GDPR applies to EU and EEA residents. You may lodge a complaint with the data protection authority in your member state. A directory of national data protection authorities is available at edpb.europa.eu.

EU residents may direct enquiries to privacy@todaydigital.com while our EU Article 27 representative appointment is being finalised.

California (USA)

California residents have the following additional rights under CCPA/CPRA:

- **Right to know** — the categories and specific pieces of personal information we have collected, the sources, the purposes, and the third parties we share it with
- **Right to delete** — subject to certain exceptions
- **Right to correct** inaccurate personal information
- **Right to opt out of sale or sharing** — we do not sell or share your personal information for cross-context behavioural advertising without your consent. Use the “Do Not Sell or Share My Personal Information” link in the footer of any UC Today or CX Today page, or contact privacy@todaydigital.com
- **Right to limit use of sensitive personal information** — contact privacy@todaydigital.com
- **Right to non-discrimination** — we will not treat you differently for exercising your privacy rights

Categories sold or shared in the prior 12 months (UC Today and CX Today only). Professional identity data (name, job title, company, email address) and inferred professional interest data, shared with B2B technology companies for marketing and market research purposes, where specific consent was given.

Do Not Sell or Share. We honour Global Privacy Control (GPC) signals as opt-outs from sale and sharing for California residents.

California Privacy Protection Agency (CPPA): coppa.ca.gov

Other US states

Residents of Virginia, Colorado, Connecticut, Texas, Maryland, and other states with comprehensive privacy laws have rights broadly equivalent to those described in section 9. Universal opt-out signals including GPC are honoured for residents of states that require it. Contact privacy@todaydigital.com to exercise any US state privacy right.

Canada

PIPEDA and Quebec Law 25 apply to Canadian residents. You have rights of access, correction, portability (Quebec), and withdrawal of consent. Contact privacy@todaydigital.com to exercise these rights, or contact the Office of the Privacy Commissioner of Canada (priv.gc.ca) or the Commission

d'accès à l'information (CAI, Quebec).

Australia

The Australian Privacy Act 1988 and the Privacy and Other Legislation Amendment Act 2024 apply to Australian residents. You have rights of access and correction under the Australian Privacy Principles. You may complain to the Office of the Australian Information Commissioner ([oaic.gov.au](https://www.oaic.gov.au)).

Saudi Arabia and UAE

The Saudi Personal Data Protection Law (PDPL) and the UAE Federal Personal Data Protection Law apply to residents of those countries. Contact privacy@todaydigital.com to exercise your rights under those laws.

11 Security

We take the security of your personal data seriously. Our technical and organisational measures include:

- Encryption of data in transit (TLS) and at rest
- Access controls and role-based permissions limiting who can access personal data
- Multi-factor authentication for administrative access
- Secure, HttpOnly session cookies where applicable
- Server logs that do not record IP addresses or personal data in most contexts
- Automated tests on AfterSign verifying that anonymous submission data does not leak on any public surface
- Regular review of third-party processor security arrangements

If you suspect any misuse, loss, or unauthorised access to your data, contact privacy@todaydigital.com immediately.

Known security items in progress. On AfterSign, the administrative authentication secret and the session-signing secret currently share the same value. Separation of these secrets is a planned engineering improvement. We disclose this because it is a material fact about the current security architecture of that platform. Until this is resolved, Today Digital Ltd restricts administrative access to a small number of authorised individuals and logs all administrative actions.

12 Children's data

Our platforms are intended for users aged 18 and over. We do not knowingly collect personal data from children under 18. Our B2B platforms — UC Today, CX Today, Techtelligence, and AfterSign — are specifically targeted at business professionals and are not directed at children.

If you believe we have inadvertently collected data from a child under 18, contact privacy@todaydigital.com and we will delete it promptly.

13 Changes to this notice

We will update this notice when our data practices change materially. Material changes include: new categories of data collected, new purposes, new processors, changes to retention periods, or changes to your rights.

We will notify registered users of material changes by email or by prominent notice on the relevant platform at least 14 days before the change takes effect. The effective date at the top of this document shows when the current version came into force.

A version history is maintained at todaydigital.com/privacy.

14 Contact and complaints

Privacy enquiries and rights requests

privacy@todaydigital.com

General enquiries

team@todaydigital.com

Postal

Today Digital Ltd, Flint Glass Works, Jersey
Street, Manchester, England, M4 6JW

Rights request form

todaydigital.com/privacy

Legal

legal@todaydigital.com

ICO (UK supervisory authority)

ico.org.uk · 0303 123 1113

We aim to respond to all privacy enquiries within 30 days. If your request is complex or you have submitted multiple requests, we may extend this by a further two months. We will tell you if this is the case.

If you are not satisfied with our response, you have the right to complain to the ICO or to the supervisory authority in your jurisdiction.

Today Digital Ltd — Global Privacy Notice v2.0 · 14
August 2026

Flint Glass Works, Jersey Street, Manchester,
England, M4 6JW

Company number 10494324 · ICO registration
ZA748829

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