

Axis Privacy Policy

Effective date: Sep. 9, 2026 **Last updated:** Sep. 9, 2026

This policy explains how **Fill My Funnel Ltd** handles personal data in connection with the Axis platform and our website at tryaxis.co.

Fill My Funnel Ltd is registered in England and Wales under company number **14663048**, with its registered office at North Wharf Road, London W2 1PL, United Kingdom.

Contact for privacy matters: tom@fillmyfunnel.co.uk

1. Two different roles

We handle personal data in two distinct capacities, and different rules apply to each.

As a controller. For data about the people who use Axis and visit our website — account holders, invited users, billing contacts, support correspondents, and site visitors — we decide why and how the data is processed. This policy describes that processing.

As a processor. Customers use Axis to manage advertising for themselves and for their own clients. The data they bring into the platform, including campaign data from connected advertising accounts, uploaded creative assets, submitted company information, and comments, is processed on their instructions. For that data, the customer is the controller and we act on their behalf. If you are an individual whose data has been brought into Axis by one of our customers, that customer is your first point of contact, and their privacy policy governs. Section 4 describes this processing, and our Data Processing Agreement sets out the terms.

2. Data we process as controller

Account and profile data

Name, work email address, password credentials (stored hashed), organisation name, role and permissions within an organisation, and profile preferences.

Usage and activity data

Records of actions taken in the platform, including comments authored, drafts created and edited, automations configured, and audit trail entries showing who did what and when. Some of this data is retained for record integrity even after an account is closed. See section 8.

Billing data

Billing contact details, company name, billing address, VAT number, subscription plan, and transaction history. **We do not store full payment card details.** Card data is collected and stored by Stripe, our payment processor. We receive only limited information such as the card brand, the last four digits, and the transaction outcome.

Support and communications

Emails and messages you send us, and our replies.

Technical data

IP address, browser type, device information, and log data generated when you access the platform. This is used for security, fraud prevention, debugging, and maintaining service integrity.

Website analytics

See section 6.

3. Why we process it, and our legal basis

Purpose	Legal basis
Creating and managing accounts, providing the platform	Performance of a contract
Billing, invoicing, collecting payment	Performance of a contract
Providing support and responding to enquiries	Performance of a contract; legitimate interests
Securing the platform, preventing abuse and fraud	Legitimate interests

Purpose	Legal basis
Debugging, monitoring, and improving the service	Legitimate interests
Maintaining audit trails and records of activity	Legitimate interests; performance of a contract
Complying with legal, tax, and accounting obligations	Legal obligation
Website analytics	Consent
Sending service announcements and material change notices	Performance of a contract; legitimate interests
Sending marketing emails about our products	Consent, or the soft opt-in for existing business customers

Where we rely on legitimate interests, those interests are operating and securing a business software product. We have considered the impact on individuals and believe the processing is proportionate. You may object to this processing (see section 10).

You can unsubscribe from marketing emails at any time using the link in the email. Service and account notices are not marketing and cannot be opted out of while you hold an account.

4. Data we process on behalf of customers

When a customer uses Axis, the following may be processed under their instructions:

- **Connected advertising account data.** Campaign, advertisement, creative, budget, spend, and performance data retrieved from platforms the customer authorises us to connect to, currently LinkedIn. Access tokens for these connections are held server-side and are never exposed to the browser.
- **Uploaded and drafted content.** Ad copy, images, video, documents, and other assets the customer creates or uploads, which may contain personal data depending on what the customer chooses to include.
- **Client account records.** Company information, notes, and other details a customer submits about each client it manages.
- **Collaboration data.** Comments, annotations, and activity records generated by users and guests working within an organisation.

We do not currently retrieve LinkedIn Lead Gen Form submissions or audience list data. If that changes, we will update this policy and give notice before the functionality becomes available.

We do not sell customer data, and we do not use it to train machine learning models.

5. Third-party agents and integrations

Axis may allow customers to connect their own AI agents, Model Context Protocol servers, or other third-party tools. Where a customer does this, data may be transmitted to systems that we do not operate, control, or vet. Our responsibility for that data ends at the boundary of our systems, and the customer is responsible for the onward handling of any personal data by the tools it chooses to connect.

6. Cookies and analytics

On the Axis platform, we use only strictly necessary cookies and equivalent local storage, required to keep you signed in and to maintain session security. These do not require consent.

On our website tryaxis.co, we use Google Analytics to understand how visitors find and use the site. Google Analytics sets cookies and is not strictly necessary, so we ask for your consent before it loads. You can withdraw consent at any time through our cookie settings, and declining does not affect your use of the site. Data collected through Google Analytics may be transferred to Google LLC in the United States. See section 9.

We plan to introduce PostHog for product analytics within the platform. We will update this policy and, where consent is required, ask for it before that happens.

[ACTION REQUIRED] This section describes a consent banner on tryaxis.co. One must be in place, blocking Google Analytics until the visitor consents, before this policy is published. Alternatively, switch to a cookieless analytics tool and simplify this section.

7. Who we share data with

We share data with the following categories of recipients:

Recipient	Purpose	Location of processing
Supabase	Database and data storage	United Kingdom (London)
Railway	Backend application hosting	[CONFIRM REGION]
Vercel	Frontend hosting and content delivery	Global edge network
Stripe	Payment processing and billing	EU / US
Google Analytics	Website analytics (marketing site only)	US
LinkedIn	Advertising platform connected at customer instruction	US / global

We may also disclose data to professional advisers, to authorities where legally required, and to a successor entity in the event of a merger, acquisition, or sale of assets, in which case we will give notice.

We do not sell personal data or share it for cross-context behavioural advertising.

An up-to-date list of sub-processors is available on request, and material changes are notified to customers as described in our Data Processing Agreement.

8. Retention and deletion

Customer data in the platform is retained for as long as the customer's organisation is active.

On account closure or termination, we delete customer data on request within 30 days. Deletion is currently carried out by our team rather than through a self-service control. To request deletion, contact tom@fillmyfunnel.co.uk.

Backups. Deleted data may persist in encrypted database backups for up to 30 days after deletion, after which it is overwritten in the normal backup cycle. Backup copies are not accessible for ordinary use and are only restored in the event of a system failure.

When an individual user leaves an organisation and their account is closed, we remove their profile and login credentials. Their past contributions — comments, edits, and audit trail entries — are disassociated from their identity but retained, because removing them would break the record of who approved and changed what within a customer's account. We want to be accurate about this: because those records remain linked to an internal identifier, this is pseudonymisation rather than full anonymisation, and the data may still constitute personal data. If you want your contributions fully removed, contact us and we will assess the request against the customer's own record-keeping needs.

Billing and tax records are retained for six years after the end of the relevant accounting period, as required by UK law.

Support correspondence is retained for up to two years.

9. International transfers

Our primary database is hosted in London, United Kingdom. Some of our service providers process data outside the UK and the European Economic Area, including in the United States.

Where data is transferred outside the UK or EEA, we rely on:

- UK adequacy regulations or an EU adequacy decision where one applies to the destination country; or
- the EU Standard Contractual Clauses together with the UK International Data Transfer Addendum, or the UK International Data Transfer Agreement, supplemented by additional safeguards where appropriate.

You can request further information about the safeguards in place by contacting us.

10. Your rights

If you are in the UK or the EEA, you have the right to:

- **access** the personal data we hold about you;
- **rectify** inaccurate or incomplete data;
- **erase** your data in certain circumstances;
- **restrict** processing in certain circumstances;
- **object** to processing based on legitimate interests, and to direct marketing at any time;

- **data portability** for data you provided, where processing is based on consent or contract and carried out by automated means; and
- **withdraw consent** at any time, where processing is based on consent. This does not affect processing carried out before withdrawal.

To exercise any of these rights, contact tom@fillmyfunnel.co.uk. We will respond within one month. We may ask you to verify your identity first.

If your data was brought into Axis by one of our customers, direct your request to that customer. We will assist them in responding.

Complaints. If you are unhappy with how we have handled your data, you can complain to the UK Information Commissioner's Office at ico.org.uk, or to your local supervisory authority if you are in the EEA. We would appreciate the chance to address your concern first.

11. Security

We take the following measures to protect personal data:

- Advertising platform access tokens are held server-side and never exposed to the browser, enforced at the application architecture level.
- Data is encrypted in transit using TLS, and encrypted at rest by our infrastructure providers.
- Access to production systems and customer data is restricted to personnel who need it to operate and support the service.
- Authentication and role-based access controls govern what each user can see and do within an organisation.
- We monitor for faults and security issues and patch dependencies.

We do not currently hold SOC 2, ISO 27001, or equivalent certification.

No system is completely secure. If a personal data breach occurs that is likely to result in a risk to individuals, we will notify the Information Commissioner's Office within 72 hours where required, and notify affected customers without undue delay.

12. Children

Axis is a business tool and is not directed at children. We do not knowingly collect personal data from anyone under 18. Accounts require users to be at least 18 years old.

13. Changes to this policy

We may update this policy. Where changes are material, we will notify account holders by email or in-product notice before they take effect. The "last updated" date at the top always reflects the current version.

14. Contact

Fill My Funnel Ltd North Wharf Road, London W2 1PL, United Kingdom Company No. 14663048 Email: tom@fillmyfunnel.co.uk