



PRIVACY POLICY: AXIOMA PAY

Effective Date: 23 July 2026

Data Controller: DODITEC LTD (*trading as **Axioma Technologies / Axioma Pay***)

Registered Office Address: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ

Company Registration Number: 14216887

Official Data Contact: support@axiomapay.uk

1. CORPORATE STRUCTURE, SCOPE, AND DATA CONTROLLER STATUS

1.1 Data Controller Identity: "Axioma Pay" is a commercial brand name and trading name of **Axioma Technologies**, which is itself a trading name of **DODITEC LTD**, a private limited company registered in England and Wales under Company Registration Number 14216887 (referred to throughout this Policy as the "**Company**", "**we**", "**us**", or "**our**"). For the purposes of the UK General Data Protection Regulation (**UK GDPR**), the Data Protection Act 2018, and the EU GDPR (where applicable), **DODITEC LTD** is the primary Data Controller for personal data processed directly through the Axioma Pay platform at www.axiomapay.uk (the "**Platform**").

1.2 Technical Service Provider (TSP) Scope: Axioma Pay operates exclusively as a stateless, non-custodial technology routing layer. This Privacy Policy outlines how we collect, process, store, and safeguard personal information when you use our software, routing tools, user dashboards, and administrative interfaces.

1.3 Stateless Architecture Disclaimer: The Platform is intentionally engineered **not** to ingest, process, store, or hold sensitive payment card details (such as Primary Account Numbers or CVVs), bank account login credentials, or customer wallet balances. All financial processing, identity verification, payment card handling, and payout operations are handled directly by our integrated payment infrastructure partner, **Stripe**.

2. DUAL DATA ARCHITECTURE: HOW STRIPE FITS IN

2.1 Separation of Roles: When utilizing the Platform to generate, request, transmit, or manage payment instructions, your data is processed across two distinct operational flows:

- (a) **Platform Software Data Flow (DODITEC LTD):** We process profile data, user preferences, API interaction metadata, and read-only status logs strictly necessary to operate the software routing interface.
- (b) **Financial & Verification Processing Data Flow (Stripe):** Financial services, Stripe Connect Express onboarding, identity verification (Know Your Customer / AML compliance), card network routing, chargeback handling, and payout execution are operated by **Stripe Payments UK, Ltd.** (and its global affiliates).

2.2 Stripe as Independent Controller: For payment processing, risk monitoring, sanctions screening, regulatory identity checks, and fraud prevention, Stripe acts as an independent Data Controller under UK/EU data protection law. Stripe's collection and processing of your personal information are

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governed strictly by the **Stripe Privacy Policy** (accessible at stripe.com/privacy). We encourage you to review Stripe's privacy documentation to understand their processing practices.

3. INFORMATION WE PROCESS

We collect and process only the minimal personal data required to provide a reliable, secure, and stateless software layer. This data falls into the following categories:

- **Account & Business Contact Data:** Name, legal business name, trading address, business email address, account role, password hashes, and biometric or device authentication metadata (used strictly for credential verification on your local device).
- **Technical Routing & API Metadata:** Unique user identifiers, connected Stripe Account IDs (acct_...), Stripe Customer IDs, Stripe Invoice IDs, subscription schedule references, Checkout session tokens, webhook event logs, and software communication records.
- **Billing Instruction Details:** Read-only transaction metadata transmitted by or returned to the software, including invoice amounts, item descriptions, currency codes, VAT/tax identifiers provided by the User, and non-sensitive recipient contact details.
- **Security & Device Diagnostics:** IP addresses, browser user-agent strings, device identifiers, session logs, and security signals processed to prevent unauthorized access and protect API endpoints.
- **Support & Communication Records:** Enquiries, support tickets, feedback, and correspondence submitted to support@axiomapay.uk or via our platform support interfaces.

What We Never Collect or Store: Axioma Pay **does not** collect, store, or have access to full credit/debit card numbers, card security codes (CVV/CVC), banking passwords, or actual account monetary balances. All sensitive financial data is entered directly into Stripe-hosted secure components (such as Stripe Checkout or embedded Stripe Elements).

4. PURPOSES AND LEGAL BASES FOR PROCESSING

Under the UK GDPR, we rely on specific legal bases to process your personal data:

Processing Purpose	Categories of Personal Data	Legal Basis under UK GDPR
Platform Provision & Routing: Operating the software, executing API payment commands, displaying read-only status, and managing user accounts.	Contact Data, Account Data, Routing & API Metadata, Instruction Details.	Performance of a Contract (Art. 6(1)(b)): Necessary to deliver software services under our Terms of Service.

Processing Purpose	Categories of Personal Data	Legal Basis under UK GDPR
System Security & Fraud Prevention: Protecting the software infrastructure against unauthorized access, cyberattacks, API abuse, and fraudulent instructions.	Security Signals, Device Diagnostics, IP Addresses, Audit Logs.	Legitimate Interests (Art. 6(1)(f)): Necessary to maintain network and software platform security.
Legal & Regulatory Compliance: Maintaining technical audit trails, verifying user authority, and fulfilling legal accounting or software obligations.	Account Data, Audit Logs, Tax Metadata, Communication Records.	Compliance with Legal Obligations (Art. 6(1)(c)).
Customer Support: Resolving software routing errors, assisting with technical configurations, and responding to platform enquiries.	Contact Data, Support Records, API Status Logs.	Performance of a Contract (Art. 6(1)(b)) and Legitimate Interests (Art. 6(1)(f)).

5. DATA SHARING AND THIRD-PARTY DISCLOSURES

We do not sell, rent, or trade personal data to third parties. We disclose personal information solely to necessary service providers and partners under strict confidentiality obligations:

- **Stripe Payments UK, Ltd.:** To facilitate payment routing, Express account creation, and transaction monitoring via Stripe Connect API integrations.
- **Infrastructure & Cloud Service Providers:** Trusted cloud hosting, database management, security monitoring, and API gateway providers operating within secure data centre environments.
- **Professional Advisers:** External legal counsel, auditors, accountants, and compliance advisers assisting DODITEC LTD in fulfilling statutory obligations.
- **Law Enforcement & Regulatory Authorities:** Where mandated by law, court order, or formal regulatory requirement under applicable UK or international legislation.

6. INTERNATIONAL DATA TRANSFERS

Because our cloud infrastructure and integrated partners (including Stripe) operate globally, your personal data may be transferred to, processed, or stored in destinations outside the United Kingdom or the European Economic Area (EEA).



Where international data transfers occur, DODITEC LTD ensures that appropriate legal safeguards are applied in compliance with Chapter V of the UK GDPR, including:

- Transmitting data to countries recognized as providing an **adequate level of protection** by the UK Secretary of State;
- Utilizing **UK International Data Transfer Agreements (IDTAs)** or the **UK Addendum to EU Standard Contractual Clauses (SCCs)** with third-party service providers; and
- Ensuring robust technical and organizational security controls (such as end-to-end encryption) during transit.

7. DATA SECURITY MEASURES

We implement appropriate technical and organisational measures to safeguard the security, confidentiality, and integrity of your personal information, including:

- **Stateless Software Architecture:** Minimising risk by refusing storage of sensitive financial credentials or customer funds.
- **Transport Encryption:** Forcing HTTPS and TLS encryption protocols for all API data transmissions and website traffic.
- **Access Controls & Authentication:** Strict role-based access restrictions, multi-factor administrative authentication, and secure isolation of API secret keys.
- **Regular Monitoring:** Continuous security monitoring of software routing channels to detect anomalies or unauthorized system access.

Please note that no method of transmission over the Internet or electronic storage can be guaranteed 100% secure. You remain responsible for safeguarding your personal login credentials and access devices.

8. DATA RETENTION

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including software operation, legal compliance, dispute resolution, and regulatory reporting:

- **Account & Profile Data:** Retained for the active lifecycle of your Axioma Pay account, plus **6 years** following account closure to comply with statutory legal and commercial limitation periods under UK law.
- **Technical Logs & Webhooks:** System audit trails and API status logs are retained for **12 months** before automated deletion or anonymisation, unless flagged for security investigation.
- **Customer Support Records:** Retained for **3 years** from the date of ticket resolution.
- **Stripe Data:** Financial records, identity verification documents (KYC), card processing logs, and payout histories held directly by Stripe are retained in accordance with Stripe's legal and financial regulatory retention schedules.

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9. YOUR DATA PROTECTION RIGHTS

Under the UK GDPR and Data Protection Act 2018, you possess the following rights regarding your personal data processed by DODITEC LTD:

- **Right of Access:** The right to request a copy of the personal data we hold about you.
- **Right to Rectification:** The right to request correction of inaccurate or incomplete personal data.
- **Right to Erasure ("Right to be Forgotten"):** The right to request deletion of your personal data where there is no legal justification for its continued processing.
- **Right to Restriction:** The right to request that we temporarily restrict the processing of your data under specific statutory scenarios.
- **Right to Data Portability:** The right to receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** The right to object to processing based on legitimate interests or direct marketing.

How to Exercise Your Rights:

To exercise any of these rights regarding platform software data, please email our Data Team at support@axiomapay.uk. We may require proof of identity before fulfilling your request. We will respond to all valid requests within **one (1) calendar month**.

Requests Pertaining to Stripe Processing: If your request relates to Stripe account onboarding, identity verification (KYC) documents, payment card details, payouts, chargeback disputes, or Stripe account blocks, you should direct your enquiry directly to Stripe via the **Stripe Express Dashboard** or stripe.com/privacy.

Right to Lodge a Complaint:

If you believe that our processing of your personal data infringes UK data protection laws, you have the statutory right to lodge a complaint with the UK supervisory authority:

- **Information Commissioner's Office (ICO)**

Website: www.ico.org.uk

Telephone: 0303 123 1113

10. THIRD-PARTY LINKS AND SERVICES

The Platform contains links to third-party websites, hosted Checkout pages, and API components (including Stripe). DODITEC LTD is not responsible for the privacy practices, security controls, or content of external third-party sites. We advise you to read the privacy notices of every website you visit.

11. CHANGES TO THIS PRIVACY POLICY

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We reserve the right to modify or update this Privacy Policy at any time to reflect changes in our software features, legal requirements, or Stripe integration rules. Updated versions will be published at www.axiomapay.uk with a revised "Effective Date". Your continued access or use of the Platform after an update constitutes acknowledgement of the revised terms.

12. CONTACT INFORMATION

DODITEC LTD (*Trading as Axioma Technologies / Axioma Pay*)

Trading address:

DODITEC LTD (*t/a Axioma Technologies / Axioma Pay*)

Colworth House
Colworth Science Park
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