

Responsible Party / Data Controller	Arturo Sotomayor Hernández
Trade Name	Axis Business Growth
Privacy Contact Email	contacttoarturo@gmail.com
Operating Model	Digital and remote operation. No public-facing physical office or retail address.
Last Updated	14 June 2026

Glossary of Key Terms

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1. Introduction

This Privacy Notice describes how Arturo Sotomayor Hernández, operating commercially under the trade name Axis Business Growth, collects, uses, stores, shares, protects, and otherwise processes personal data in connection with its digital technology consulting, artificial intelligence automation, business digitalization, software development, data analytics, commercial technology, digital marketing, customer acquisition, CRM, WhatsApp Business automation, dashboard, reporting, workflow automation, and managed digital services.

Axis Business Growth recognizes that personal data must be processed lawfully, fairly, proportionately, securely, transparently, and only for legitimate business, contractual, operational, commercial, legal, and technical purposes. This Privacy Notice is intended to provide clear information to clients, prospects, users, suppliers, representatives, contractors, website visitors, and other individuals who interact with Axis Business Growth regarding the processing of their personal data.

This Privacy Notice has been drafted to align with the general principles of Mexico's Federal Law on the Protection of Personal Data Held by Private Parties, its implementing privacy logic, and internationally recognized privacy governance practices, including transparency, purpose limitation, data minimization, confidentiality, accountability, security, retention control, vendor oversight, and privacy-by-design.

2. Identity of the Data Controller

The responsible party and data controller for the processing of personal data described in this Privacy Notice is:

Responsible Party / Data Controller: Arturo Sotomayor Hernández

Trade Name: Axis Business Growth

Business Model: Digital technology consulting, artificial intelligence automation, software development, business digitalization, data analytics, commercial technology, digital marketing automation, customer acquisition systems, CRM, WhatsApp Business automation, dashboards, workflow automation, and managed digital services.

For purposes of this Privacy Notice, "Axis Business Growth," "we," "us," or "our" refers to Arturo Sotomayor Hernández operating under the trade name Axis Business Growth.

3. Contact Details for Privacy Matters

For questions, requests, clarifications, objections, revocation of consent, limitation of use or disclosure, or the exercise of ARCO rights, the data subject may contact Axis Business Growth through the following privacy contact email:

Privacy Contact Email: contacttoarturo@gmail.com

All privacy-related requests must be sent to this email address unless Axis Business Growth later designates an alternative privacy channel.

4. Digital and Remote Operation; No Public-Facing Physical Address

Axis Business Growth operates digitally and remotely. The business does not currently maintain a physical office, retail location, or public-facing physical address for the receipt of privacy requests, in-person customer service, or public visits.

Accordingly, privacy-related communications, requests, notices, and follow-ups should be submitted through the privacy contact email indicated above. Axis Business Growth may request reasonable identity verification and additional information through digital means to process privacy requests securely and appropriately.

5. Scope of this Privacy Notice

This Privacy Notice applies to personal data processed by Axis Business Growth in connection with:

- a. The website, landing pages, forms, contact channels, and digital properties operated by or on behalf of Axis Business Growth.
- b. Commercial proposals, quotations, diagnostics, onboarding flows, contracts, service agreements, and client communications.
- c. Digital transformation, AI automation, software, CRM, dashboards, data analytics, marketing automation, WhatsApp Business automation, customer service automation, workflow automation, and managed digital services.
- d. Communications through email, WhatsApp, forms, CRM systems, chatbots, AI assistants, web assistants, phone calls, videoconferences, collaboration tools, and support channels.
- e. Client projects, including data, files, operational records, workflow information, process maps, automation inputs, reports, customer records, sales pipeline data, documents, and dashboard information made available by clients or generated during service delivery.
- f. Business development, lead generation, digital marketing, campaign measurement, analytics, support, billing, administration, and legal compliance.

This Privacy Notice does not replace any specific contractual data processing agreement, confidentiality agreement, service agreement, statement of work, or project-specific data handling instructions that may apply to a particular client engagement. In the event of a conflict between this Privacy Notice and a specific written agreement, the written agreement will govern to the extent permitted by applicable law.

6. Categories of Data Subjects Covered

This Privacy Notice may apply to the following categories of individuals:

- a. Current, former, and prospective clients.
- b. Representatives, officers, directors, employees, contractors, collaborators, agents, or authorized contacts of legal entities that interact with Axis Business Growth.
- c. Website visitors and landing page users.
- d. Individuals who submit contact forms, request diagnostics, ask for quotations, book calls, or request information.
- e. Users of digital tools, systems, dashboards, portals, automations, CRM workflows, AI assistants, chatbots, web assistants, or support channels implemented or managed by Axis Business Growth.
- f. Suppliers, vendors, contractors, consultants, professional advisers, and commercial partners.
- g. Attendees of meetings, calls, video conferences, workshops, diagnostics, demos, onboarding sessions, or training sessions.
- h. Individuals whose personal data is included in datasets, documents, workflows, systems, databases, CRMs, sales pipelines, reports, forms, dashboards, or automation inputs provided by clients in connection with projects.
- i. Other individuals who communicate with, provide information to, or otherwise interact with Axis Business Growth.

7. Categories of Personal Data Collected

Depending on the relationship, interaction, service, project, or communication channel, Axis Business Growth may collect and process the following categories of personal data.

8. Business Contact Data

Axis Business Growth may process business contact data, including:

- a. Full name.
- b. Business email address.
- c. Business phone number.
- d. WhatsApp number.
- e. Job title, role, department, or professional position.
- f. Employer, business name, organization, or trade name.
- g. Professional profile, business sector, or industry.
- h. Work location or region, when provided.
- i. Business social media profiles or professional networking information.
- j. Communication preferences and commercial interaction history.

9. Identification and Contact Data

Axis Business Growth may process identification and contact data, including:

- a. Name and surname.
- b. Email address.
- c. Telephone number.
- d. WhatsApp or messaging identifier.
- e. Signature, when included in contracts, proposals, acceptance documents, forms, or correspondence.
- f. Identification information reasonably necessary to verify identity in connection with legal, contractual, billing, privacy, or security processes.
- g. Any other contact or identification data voluntarily provided by the data subject.

Axis Business Growth will not request official identification documents unless reasonably necessary for a legitimate business, contractual, legal, billing, security, or rights-management purpose.

10. Billing and Tax-Related Data

For billing, invoicing, accounting, tax, administrative, and payment purposes, Axis Business Growth may process:

- a. Billing name or legal name.
- b. Tax identification information, where applicable.
- c. Fiscal address or tax address, where required by applicable law or invoicing processes.
- d. Invoice details.
- e. Payment status.
- f. Payment references.
- g. Bank or payment confirmation data, when provided.
- h. Contract value, fees, payment dates, billing history, and collection information.
- i. Any information required for tax, accounting, audit, or legal compliance.

Axis Business Growth does not intend to collect full payment card data directly unless expressly disclosed and supported by appropriate payment processing arrangements. Payment providers may process payment information under their own terms, privacy notices, and security standards.

11. Commercial, Transactional, and Contractual Data

Axis Business Growth may process commercial, transactional, and contractual information, including:

- a. Service inquiries.
- b. Diagnostic requests.
- c. Proposal and quotation history.
- d. Contractual documents and negotiations.
- e. Statements of work, project scopes, deliverables, milestones, and acceptance criteria.
- f. Purchase, billing, and service history.
- g. Client requirements, business needs, technical needs, and operational priorities.
- h. Meeting notes, commercial follow-up records, CRM entries, and pipeline status.
- i. Objections, preferences, feedback, decisions, approvals, and project communications.
- j. Support history, change requests, issue logs, and service tickets.
- k. Records of consent, acceptance, authorization, or contractual approval.

12. Technical, Device, Browser, IP, Analytics, Cookie, and Usage Data

When individuals interact with Axis Business Growth's website, landing pages, forms, digital platforms, advertising campaigns, emails, dashboards, portals, automations, or technology tools, Axis Business Growth or its technology providers may process technical and usage data, including:

- a. IP address.
- b. Device type.
- c. Browser type and version.
- d. Operating system.
- e. Referring URLs.
- f. Pages viewed.
- g. Time and date of visits.
- h. Session duration.
- i. Click behavior.
- j. Conversion events.
- k. Campaign source, medium, and attribution parameters.
- l. Cookie identifiers, pixel identifiers, analytics identifiers, or similar online identifiers.
- m. Approximate location derived from IP address or platform analytics.
- n. Error logs, security logs, performance logs, and diagnostic information.
- o. Usage patterns related to dashboards, portals, systems, automations, or digital tools.

This information may be used for security, analytics, functionality, performance monitoring, advertising measurement, service improvement, troubleshooting, and business intelligence.

13. Communications Data

Axis Business Growth may process information contained in or generated through communications, including:

- a. Emails.
- b. WhatsApp messages.
- c. Contact forms.
- d. Website chat messages.
- e. Chatbot and AI assistant interactions.

- f. CRM notes and follow-up records.
- g. Phone call notes.
- h. Meeting notes.
- i. Video call information.
- j. Calendar invitations.
- k. Support requests and tickets.
- l. Attachments, screenshots, documents, images, or files provided by the data subject or by a client.
- m. Audio, video, or transcript information, only where recording or transcription is enabled and legally appropriate.
- n. Commercial preferences, objections, feedback, requests, complaints, and service instructions.

Where calls, meetings, or sessions are recorded or transcribed, Axis Business Growth will seek to provide notice or obtain consent where required by applicable law or platform rules.

14. Data Processed Through Client Projects

Because Axis Business Growth provides technology consulting, AI automation, software, CRM, dashboards, workflow automation, and managed digital services, it may process personal data contained in materials, datasets, systems, workflows, documents, and business records supplied by clients or generated in the course of project execution.

Such data may include:

- a. Workflow information.
- b. Operational data.
- c. Process maps.
- d. Business rules.
- e. Customer records.
- f. Prospect and lead records.
- g. Sales pipeline data.
- h. CRM data.
- i. Support tickets.
- j. Communication history.
- k. Dashboard data.
- l. Smart form submissions.
- m. Approval flow data.
- n. Document repositories.
- o. Documents requiring classification, extraction, drafting, or generation.
- p. Internal reports.
- q. Performance metrics.
- r. User account data.
- s. Automation inputs and outputs.
- t. Data required to configure, test, maintain, support, or optimize client systems.

In these cases, the client may act as the primary data controller or responsible party, and Axis Business Growth may act as a service provider, processor, operator, contractor, or technology implementer, depending on the agreed scope and applicable law. Project-specific data processing obligations may be set out in a separate service agreement, data processing agreement, confidentiality agreement, or statement of work.

Clients are responsible for ensuring that any personal data, documents, databases, CRM records, customer records, employee records, supplier records, prospect lists, or other datasets provided to Axis Business Growth have been obtained, disclosed, and made available lawfully, with all necessary notices, consents, authorizations, legal bases, and contractual permissions.

15. Sensitive Personal Data Policy

Axis Business Growth does not ordinarily request, seek, or require sensitive personal data for its standard commercial, consulting, software, automation, marketing, analytics, or managed digital services.

For purposes of this Privacy Notice, sensitive personal data may include information that could reveal racial or ethnic origin, health status, genetic information, biometric data for identification, religious, philosophical or moral beliefs, union membership, political opinions, sexual orientation, or other data considered sensitive under applicable law.

If sensitive personal data is voluntarily provided by a data subject, client, supplier, or third party, Axis Business Growth will seek to process it only to the extent necessary for the relevant purpose, apply reasonable confidentiality and security measures, restrict access on a need-to-know basis, and, where required, obtain express consent or rely on another legally applicable basis. Axis Business Growth may also request that unnecessary sensitive data be removed, masked, anonymized, replaced, or withheld.

Clients must not provide sensitive personal data to Axis Business Growth unless it is strictly necessary for the agreed service, legally permissible, and covered by appropriate notices, consents, contractual terms, and security instructions.

16. Data of Minors

Axis Business Growth's services are directed to businesses, professionals, organizations, and commercial users. The services are not directed to minors.

Minors should not provide personal data to Axis Business Growth without appropriate authorization from a parent, guardian, or legal representative. If Axis Business Growth becomes aware that personal data of a minor has been provided without the required authorization, it may take reasonable steps to delete, restrict, or otherwise handle such data in accordance with applicable law.

Where a client provides information involving minors in connection with a project, the client is responsible for ensuring that the processing is lawful, necessary, proportionate, and supported by the required notices, consents, authorizations, and safeguards.

17. Sources of Personal Data

Axis Business Growth may obtain personal data from the following sources:

- a. Directly from the data subject.
- b. Website forms, landing pages, contact forms, diagnostic forms, quotation forms, onboarding forms, and support forms.
- c. WhatsApp, email, phone calls, video calls, meetings, and chat channels.
- d. CRM systems and commercial follow-up tools.
- e. Client-provided datasets, documents, databases, CRMs, dashboards, files, system exports, workflows, forms, and project materials.
- f. Automation tools, AI tools, chatbot tools, web assistants, and customer service systems.
- g. Analytics platforms, advertising platforms, social media platforms, and campaign measurement tools.
- h. Cloud platforms, hosting providers, collaboration tools, communication providers, and other technology vendors.

- i. Publicly available business sources, professional directories, websites, company pages, social networks, and commercial registries, where legally permissible.
- j. Referrals, recommendations, partners, suppliers, or business contacts.
- k. Third-party platforms used by clients, prospects, or users to communicate with or provide information to Axis Business Growth.

18. Primary Processing Purposes

Axis Business Growth may process personal data for the following primary purposes, which are necessary or directly related to the relationship with the data subject, the provision of services, the execution of contracts, or the operation of the business:

- a. Responding to inquiries, messages, requests, and communications.
- b. Identifying prospects, clients, suppliers, representatives, users, and authorized contacts.
- c. Providing information about services, diagnostics, proposals, quotations, projects, and commercial terms.
- d. Preparing diagnostics, assessments, roadmaps, proposals, quotations, statements of work, and service scopes.
- e. Onboarding clients and setting up service delivery channels.
- f. Executing digital transformation, AI automation, software development, CRM, dashboard, data analytics, workflow automation, marketing automation, WhatsApp Business automation, chatbot, web assistant, customer service automation, and managed digital service projects.
- g. Analyzing processes, workflows, operational bottlenecks, systems, data flows, documents, business rules, and technology requirements.
- h. Designing, configuring, building, testing, deploying, maintaining, supporting, monitoring, and optimizing digital systems, automations, dashboards, integrations, forms, databases, CRMs, portals, internal tools, and AI-supported workflows.
- i. Providing technical support, maintenance, monitoring, optimization, reporting, troubleshooting, and service improvement.
- j. Managing contracts, authorizations, approvals, deliverables, milestones, change requests, acceptance processes, and client communications.
- k. Generating reports, dashboards, metrics, analytics, insights, recommendations, and operational documentation.
- l. Managing billing, invoicing, payments, collections, accounting, tax, and administrative processes.
- m. Maintaining records required for legal, contractual, tax, accounting, audit, security, and compliance purposes.
- n. Preventing fraud, unauthorized access, misuse, security incidents, disputes, and unlawful activity.
- o. Complying with applicable laws, regulations, contractual obligations, authority requests, and legal processes.
- p. Protecting the rights, property, operations, systems, clients, users, and legitimate interests of Axis Business Growth.

19. Secondary or Commercial Processing Purposes

Axis Business Growth may also process personal data for secondary or commercial purposes that are not strictly necessary for the original relationship but are related to business development, marketing, client relationship management, and service improvement, including:

- a. Sending commercial communications about services, diagnostics, proposals, updates, resources, events, content, campaigns, and business opportunities.
- b. Conducting follow-up with prospects, leads, former clients, and commercial contacts.
- c. Managing newsletters, content distribution, remarketing, digital advertising, and lead nurturing campaigns.

- d. Measuring campaign performance, conversion rates, engagement, and commercial effectiveness.
- e. Developing case studies, testimonials, or success stories, subject to appropriate authorization where identifiable personal data or client identity is used.
- f. Improving website content, landing pages, service offers, commercial messaging, user experience, sales processes, and support processes.
- g. Conducting market analysis, segmentation, business intelligence, and service development.
- h. Maintaining business relationship records for future commercial opportunities.

Data subjects may object to the processing of their personal data for secondary or commercial purposes or request to opt out of marketing communications by contacting Axis Business Growth at contacttoarturo@gmail.com or by using any opt-out mechanism made available in the relevant communication.

20. Processing for Diagnostics, Proposals, Quotations, Service Delivery, Support, Billing, Analytics, Automation, and Business Development

Axis Business Growth may process personal data to:

- a. Conduct business and technology diagnostics.
- b. Analyze operational friction, manual workload, productivity gaps, commercial processes, data structures, reporting needs, and automation opportunities.
- c. Prepare proposals, quotations, commercial presentations, implementation roadmaps, project plans, and pricing structures.
- d. Execute contracted services and deliver project outputs.
- e. Provide onboarding, training, documentation, support, maintenance, monitoring, reporting, and optimization.
- f. Manage billing, payment, collections, tax, and administrative records.
- g. Analyze usage, performance, productivity, service quality, and operational outcomes.
- h. Configure and operate automations, AI-supported workflows, dashboards, reports, CRMs, customer service tools, lead generation systems, and digital platforms.
- i. Develop, improve, package, and commercialize current and future digital services.

21. Use of Artificial Intelligence and Automation

Axis Business Growth may use artificial intelligence, automation, machine learning-enabled tools, rule-based workflows, generative AI tools, data processing systems, analytics tools, and other digital technologies to support service delivery, internal operations, client projects, support, reporting, marketing, and business development.

AI and automation may be used to:

- a. Classify documents, messages, leads, tickets, requests, or business records.
- b. Extract information from documents or structured datasets.
- c. Generate drafts, summaries, reports, templates, workflows, responses, scripts, project materials, commercial assets, and operational documentation.
- d. Support customer service, chatbots, WhatsApp Business automation, web assistants, and internal assistants.
- e. Analyze data, identify patterns, detect opportunities, generate recommendations, and support decision-making.
- f. Automate communications, follow-up, reminders, notifications, routing, approvals, and task assignment.
- g. Improve operational efficiency, productivity, quality control, reporting, and service delivery.
- h. Test, monitor, troubleshoot, and optimize systems, automations, dashboards, integrations, and workflows.

- i. Support digital marketing, content production, campaign analysis, audience segmentation, lead tracking, and conversion optimization.

Axis Business Growth will seek to apply reasonable safeguards when using AI and automation tools, including confidentiality obligations, access controls, minimization, vendor review where commercially reasonable, output review where appropriate, and restrictions on unnecessary disclosure of personal data.

AI-generated or automation-supported outputs may require human review, validation, contextual judgment, and business approval. Clients remain responsible for reviewing and approving deliverables, outputs, content, workflows, business rules, automations, legal text, financial assumptions, marketing messages, and operational decisions before implementation or publication, unless expressly agreed otherwise in writing.

22. AI Confidentiality, Data Minimization, and Vendor Review

Where commercially reasonable and proportionate to the service, Axis Business Growth may seek to:

- a. Limit the personal data included in AI prompts, automation inputs, test datasets, training materials, or system configurations.
- b. Mask, anonymize, pseudonymize, redact, or aggregate data where feasible.
- c. Use access controls and role-based permissions.
- d. Review relevant vendor terms, privacy terms, data processing terms, or security documentation.
- e. Avoid unnecessary submission of sensitive personal data to AI tools.
- f. Use controlled environments for client data where technically and commercially feasible.
- g. Maintain confidentiality obligations for personnel, contractors, and service providers with access to personal data.
- h. Restrict access to client project data on a need-to-know basis.
- i. Apply reasonable review procedures for AI-supported outputs when such outputs may materially affect business, client, legal, financial, operational, or customer-facing decisions.

Axis Business Growth does not guarantee that every third-party AI or technology provider will offer identical controls, retention policies, training restrictions, or data processing terms. The use of specific platforms may depend on the client's instructions, project scope, technical requirements, budget, available integrations, and commercial feasibility.

23. Automated Decision-Making

Axis Business Growth may use automated tools to support analysis, classification, routing, prioritization, drafting, reporting, follow-up, customer service, lead management, and workflow execution.

As a general rule, decisions are supported by automation and AI but are not intended to be made exclusively by automated means in a manner that produces legal or similarly significant effects on individuals, unless this is expressly disclosed, contractually agreed, or required by the nature of a specific service.

Where automated decision-making with significant effects is proposed or implemented, Axis Business Growth may provide additional notice, contractual terms, client instructions, safeguards, or review mechanisms as appropriate and legally required.

24. Cookies, Pixels, Analytics, and Tracking Technologies

Axis Business Growth's website, landing pages, emails, advertisements, forms, and digital platforms may use cookies, pixels, tags, scripts, local storage, analytics tools, and similar technologies to:

- a. Enable website functionality.
- b. Remember user preferences.

- c. Measure website traffic and page performance.
- d. Understand visitor behavior and conversion events.
- e. Attribute leads to campaigns and traffic sources.
- f. Improve user experience, content, and service offers.
- g. Detect technical problems, security events, or misuse.
- h. Support advertising, remarketing, lead tracking, and campaign measurement.

Users may be able to disable or manage cookies through browser settings, device settings, consent banners, or platform-specific tools. Disabling certain cookies or tracking technologies may affect website functionality, analytics accuracy, personalization, or campaign measurement.

Where required, Axis Business Growth may use a cookie banner, cookie notice, preference tool, or similar mechanism to provide additional information and obtain consent or preferences for non-essential cookies.

25. Digital Advertising, Remarketing, Lead Tracking, and Campaign Measurement

Axis Business Growth may use advertising platforms, analytics tools, CRM systems, marketing automation tools, pixels, tracking links, conversion APIs, audience tools, and similar technologies to:

- a. Promote its services.
- b. Reach prospects and business audiences.
- c. Measure advertisement performance.
- d. Track conversions and lead sources.
- e. Create or manage audiences.
- f. Conduct remarketing or retargeting campaigns.
- g. Analyze customer acquisition cost, conversion rates, campaign return, and commercial effectiveness.
- h. Improve landing pages, content, offers, and sales funnels.

Third-party advertising and analytics platforms may process data under their own privacy notices, terms, data processing terms, and platform policies. Users may manage certain advertising preferences through the relevant platform, browser, device, or industry opt-out tools.

26. Use of Technology Vendors and Third-Party Platforms

Axis Business Growth may use third-party technology vendors and cloud-based providers to operate, deliver, improve, secure, and scale its services. These may include:

- a. Cloud hosting providers.
- b. Website hosting providers.
- c. Domain, DNS, and infrastructure providers.
- d. CRM platforms.
- e. Marketing automation platforms.
- f. Email and communication providers.
- g. WhatsApp Business tools and messaging providers.
- h. Chatbot, AI assistant, and automation providers.
- i. Data analytics and dashboard platforms.
- j. Data integration and workflow automation tools.
- k. Payment and billing providers.

- l.** Accounting and invoicing tools.
- m.** Project management and collaboration tools.
- n.** Customer support tools.
- o.** Security, monitoring, logging, and backup providers.
- p.** Advertising, pixel, remarketing, and campaign measurement platforms.
- q.** Software development, version control, deployment, and testing tools.

These providers may process personal data as processors, service providers, independent controllers, operators, sub-processors, or technology platforms depending on the nature of the service, contractual terms, and applicable law.

27. Processors and Service Providers

Axis Business Growth may authorize processors, contractors, consultants, vendors, technology providers, or professional advisers to process personal data on its behalf or in connection with services. Such parties may be granted access to personal data only where reasonably necessary for the relevant purpose and subject to appropriate contractual, technical, organizational, or confidentiality controls where commercially reasonable and legally required.

Axis Business Growth seeks to work with reputable vendors and service providers. However, third-party platforms may maintain their own infrastructure, data centers, subprocessors, security controls, retention policies, and privacy practices. Where a third-party platform is selected, requested, configured, or approved by a client, the client may be responsible for reviewing and accepting the relevant terms, privacy notices, data processing terms, and security conditions.

28. National and International Data Transfers

Because Axis Business Growth operates digitally and may use cloud-based technology providers, communication tools, CRM systems, automation platforms, AI tools, hosting providers, analytics services, advertising platforms, and other technology vendors, personal data may be transferred, stored, accessed, or processed in Mexico or in other jurisdictions.

Such national or international transfers may be necessary for:

- a.** Service delivery.
- b.** Cloud hosting and infrastructure.
- c.** Software development and deployment.
- d.** Technical support.
- e.** Client communication.
- f.** Project execution.
- g.** CRM and marketing operations.
- h.** WhatsApp Business automation and messaging.
- i.** AI automation and analytics.
- j.** Dashboard and reporting services.
- k.** Payment, billing, accounting, or tax administration.
- l.** Legal compliance.
- m.** Security monitoring, backups, and incident response.
- n.** Contract administration and business operations.

Where required by applicable law, Axis Business Growth will seek to implement appropriate measures for data transfers, which may include contractual safeguards, confidentiality obligations, vendor review, client instructions, consent, transfer clauses, or reliance on legally recognized transfer mechanisms.

29. Third-Party Platform Privacy Terms

Third-party platforms used in connection with Axis Business Growth's services may process personal data under their own privacy notices, terms of service, data processing terms, cookie policies, AI terms, security terms, and platform rules.

Axis Business Growth is not responsible for the independent privacy practices, security practices, availability, compliance posture, or contractual terms of third-party platforms where such platforms act independently or where the client chooses, controls, configures, or authorizes the relevant platform.

Data subjects and clients should review the privacy notices and terms of any third-party platforms they use or authorize.

30. Data Retention Period

Axis Business Growth will retain personal data for as long as reasonably necessary to fulfill the purposes described in this Privacy Notice, unless a longer retention period is required or permitted by law, contract, tax requirements, accounting rules, dispute prevention, auditability, security, or legitimate business needs.

Retention criteria may include:

- a. The duration of the commercial, contractual, or service relationship.
- b. The time needed to respond to inquiries, proposals, quotations, and commercial follow-up.
- c. The time required to deliver, maintain, support, monitor, or optimize services.
- d. Legal, tax, billing, accounting, audit, and compliance obligations.
- e. Contractual obligations and limitation periods.
- f. Support history, change requests, project records, and acceptance evidence.
- g. Security logs, system integrity, backup cycles, and fraud prevention.
- h. The need to prevent, investigate, or defend against claims, disputes, misuse, unauthorized activity, or legal demands.
- i. The nature and sensitivity of the data.
- j. The cost, risk, and operational feasibility of deletion, anonymization, or archiving.
- k. Client instructions and project-specific data handling terms.

Where appropriate, Axis Business Growth may delete, anonymize, aggregate, archive, restrict, or securely retain data after the primary purpose has been fulfilled.

31. Security Measures

Axis Business Growth seeks to implement reasonable administrative, technical, and organizational security measures designed to protect personal data against unauthorized access, loss, misuse, alteration, disclosure, destruction, or unlawful processing.

Depending on the nature of the data, service, system, platform, project, and commercial feasibility, such measures may include:

- a. Access controls.
- b. Password protection.
- c. Role-based permissions.
- d. Need-to-know access restrictions.
- e. Confidentiality obligations.
- f. Vendor review where commercially reasonable.
- g. Secure cloud services.

- h. Encrypted connections where supported by the platform.
- i. Backups where appropriate.
- j. Security monitoring and logging where available.
- k. Segregation of client information where feasible.
- l. Controlled sharing of files, links, and credentials.
- m. Internal policies, procedures, or instructions.
- n. Incident escalation procedures.
- o. Data minimization and retention controls.
- p. Secure disposal or deletion processes where feasible.
- q. Awareness and training for personnel or contractors with access to personal data.

No method of transmission, storage, hosting, cloud processing, software operation, AI processing, or digital communication is completely secure. Axis Business Growth does not guarantee absolute security, but it will seek to apply reasonable and proportionate controls considering the nature of the data, the service, available technology, implementation cost, operational risk, and applicable legal requirements.

32. Confidentiality Obligations

Axis Business Growth treats client information, project materials, commercial information, technical information, operational data, and personal data as confidential where required by law, contract, professional practice, or the nature of the relationship.

Personnel, contractors, vendors, or collaborators who require access to personal data may be subject to confidentiality obligations, contractual duties, access restrictions, or professional duties, as appropriate. Confidentiality obligations may continue after the end of the relationship where legally or contractually required.

33. Access Restriction and Need-to-Know Access

Access to personal data is intended to be limited to individuals, contractors, service providers, systems, platforms, or vendors that reasonably require access to perform their functions, deliver services, provide support, maintain systems, comply with legal obligations, or protect legitimate interests.

Axis Business Growth may restrict, suspend, or revoke access when it is no longer necessary or when security, confidentiality, legal, operational, or contractual risks require such action.

34. Data Accuracy and User Responsibility

Data subjects, clients, suppliers, and users are responsible for providing accurate, complete, lawful, and up-to-date information.

Axis Business Growth may rely on the information provided by the data subject, client, supplier, representative, or authorized user. Axis Business Growth is not responsible for inaccuracies, outdated information, incomplete records, unlawful datasets, or unauthorized disclosures caused by the person or entity that provided the information.

Clients are responsible for ensuring the accuracy, legality, relevance, and proportionality of personal data provided to Axis Business Growth in connection with projects, automations, CRMs, dashboards, datasets, documents, forms, or systems.

35. Rights of the Data Subject

Subject to applicable law, data subjects may have rights in relation to their personal data, including:

- a. The right to know what personal data Axis Business Growth holds about them and how it is processed.

- b. The right to access their personal data.
- c. The right to request correction of inaccurate or outdated data.
- d. The right to request cancellation, deletion, or blocking of personal data where appropriate.
- e. The right to object to certain processing activities.
- f. The right to revoke consent where processing is based on consent.
- g. The right to limit the use or disclosure of personal data.
- h. The right to opt out of marketing communications.
- i. Any additional rights recognized by applicable law.

36. ARCO Rights: Access, Rectification, Cancellation, and Opposition

Under Mexican privacy principles, data subjects may exercise ARCO rights:

Access: the right to know whether Axis Business Growth processes personal data concerning the data subject and to obtain information about such data and its processing.

Rectification: the right to request correction or updating of personal data that is inaccurate, incomplete, or outdated.

Cancellation: the right to request deletion, blocking, or cancellation of personal data when it is no longer necessary for the purposes for which it was collected or when processing is not legally justified, subject to applicable limitations.

Opposition: the right to object to the processing of personal data for specific purposes, where legally applicable.

37. Right to Revoke Consent

Where processing is based on consent, the data subject may request to revoke such consent. Revocation of consent will not affect processing carried out before the revocation, nor processing that remains necessary for legal, contractual, billing, tax, security, administrative, or legitimate business purposes.

In some cases, revocation of consent may limit Axis Business Growth's ability to provide services, maintain access, deliver support, execute a project, communicate with the data subject, comply with contractual obligations, or continue the commercial relationship.

38. Right to Limit Use or Disclosure of Personal Data

Data subjects may request that Axis Business Growth limit the use or disclosure of their personal data, particularly for secondary or commercial purposes such as marketing communications, promotional follow-up, remarketing, newsletters, or non-essential business development communications.

Requests may be submitted to contacttoarturo@gmail.com.

39. Procedure to Exercise ARCO Rights or Revoke Consent

To exercise ARCO rights, revoke consent, limit use or disclosure, or submit a privacy request, the data subject must send a written request to:

Privacy Contact Email: contacttoarturo@gmail.com

The request should include the information listed below so that Axis Business Growth can reasonably identify the data subject, understand the request, verify authority, locate the relevant data, and respond appropriately.

40. Required Information for a Valid Privacy Request

A privacy request should include:

- a. Full name of the data subject.
- b. Email address for receiving the response.
- c. Telephone or alternative contact method, if desired.
- d. Clear description of the right being exercised or the action requested.
- e. Description of the personal data or processing activity to which the request relates.
- f. Any information that helps Axis Business Growth locate the relevant data, such as project name, company name, communication channel, approximate dates, form used, service involved, or email address used.
- g. Copy of an identification document or other reasonable identity verification method, where necessary.
- h. If the request is submitted through a representative, evidence of authority or representation.
- i. Supporting documents for rectification requests, where applicable.

Axis Business Growth may request additional information when the request is incomplete, unclear, unverifiable, excessive, technically difficult to execute, or legally restricted.

41. Response Timelines

Axis Business Growth will seek to respond to privacy requests within the timelines required by applicable law. Where legally permissible, response timelines may be extended when the request is complex, incomplete, technically burdensome, requires identity verification, involves archived or backup data, depends on third-party platforms, or requires consultation with a client, vendor, adviser, or competent authority.

If the request is approved, Axis Business Growth will seek to implement the applicable action within a legally reasonable period and in accordance with applicable legal, technical, contractual, and operational requirements.

42. Limitations to Rights

Privacy rights are not absolute. Axis Business Growth may deny, limit, defer, or condition a request where permitted by applicable law, including when:

- a. The data subject is not properly identified.
- b. The requester lacks authority.
- c. The data is necessary to comply with legal, tax, accounting, billing, contractual, audit, or regulatory obligations.
- d. The data is necessary to perform a contract or maintain a business relationship.
- e. The data is necessary to establish, exercise, or defend legal claims.
- f. The data is necessary for security, fraud prevention, incident response, or dispute prevention.
- g. The data is contained in backups, logs, archives, or records that cannot reasonably be modified without disproportionate effort, provided appropriate safeguards are maintained.
- h. The request affects the rights, privacy, confidentiality, or data of third parties.
- i. The request relates to data processed on behalf of a client, in which case Axis Business Growth may refer the request to the relevant client or process it according to the client's instructions.
- j. Applicable law permits or requires continued processing.

43. Marketing Communications Opt-Out

Data subjects may opt out of receiving marketing, promotional, commercial follow-up, newsletters, or non-essential communications from Axis Business Growth by:

- a. Sending an opt-out request to **contacttoarturo@gmail.com**.

- b. Using an unsubscribe link, where available.
- c. Replying with an opt-out instruction through the relevant communication channel, where technically feasible.

Axis Business Growth may continue to send non-marketing communications related to contracts, billing, service delivery, support, security, legal notices, project updates, or administrative matters.

44. Links to Third-Party Websites and Platforms

Axis Business Growth's website, emails, proposals, dashboards, systems, messages, or digital materials may contain links to third-party websites, platforms, tools, applications, payment providers, social networks, messaging platforms, cloud services, or resources.

Axis Business Growth is not responsible for the privacy practices, security standards, content, terms, or data processing activities of third-party websites or platforms that it does not control. Users should review the privacy notices and terms of such third parties before providing personal data or using their services.

45. Business Transfers, Restructuring, Assignment of Contracts, or Change of Control

Axis Business Growth may disclose or transfer personal data where reasonably necessary in connection with a business transaction, restructuring, merger, acquisition, sale of assets, assignment of contracts, financing, partnership, reorganization, transfer of operations, succession, or similar transaction involving all or part of its business, services, assets, contracts, or client relationships.

In such cases, Axis Business Growth will seek to apply reasonable confidentiality, continuity, and legal safeguards, and the receiving party may process personal data in accordance with this Privacy Notice or a successor privacy notice, subject to applicable law.

46. Legal Compliance, Authorities, and Dispute Resolution

Axis Business Growth may process, preserve, disclose, or transfer personal data when necessary to:

- a. Comply with applicable laws, regulations, court orders, subpoenas, official requests, tax requirements, accounting obligations, or legal processes.
- b. Respond to competent authorities, regulators, courts, law enforcement agencies, or dispute resolution bodies.
- c. Protect rights, property, safety, confidentiality, systems, operations, clients, users, or legitimate interests.
- d. Prevent, detect, investigate, or respond to fraud, misuse, unauthorized access, security incidents, contractual breaches, or unlawful activity.
- e. Establish, exercise, or defend legal claims.
- f. Enforce contracts, terms, policies, or commercial rights.

If a data subject considers that Axis Business Growth has not adequately addressed a privacy request, the data subject may have the right to seek guidance or file a complaint with the competent data protection authority in Mexico or any successor or applicable authority, subject to applicable law.

47. Updates to this Privacy Notice

Axis Business Growth may update, modify, expand, or replace this Privacy Notice from time to time to reflect changes in its services, technology, AI tools, vendors, legal requirements, commercial practices, security measures, website functionality, or operational model.

The updated version will be made available through the website, proposals, onboarding materials, contracts, digital communications, or other appropriate channels. The date of the latest update will be indicated at the top or bottom of the

Privacy Notice.

Continued use of Axis Business Growth's website, services, contact channels, forms, platforms, automations, systems, or digital communications after publication or notice of an updated Privacy Notice may be understood as acknowledgment of the updated terms, to the extent permitted by applicable law.

48. Acceptance and Consent

By providing personal data to Axis Business Growth through the website, forms, WhatsApp, email, CRM channels, meetings, contracts, proposals, onboarding processes, support channels, or other communication methods, the data subject acknowledges that they have read and understood this Privacy Notice.

Where consent is required by applicable law, the data subject's voluntary provision of personal data, submission of forms, acceptance of contracts, use of digital channels, continuation of communications, or express confirmation may constitute consent to the processing of personal data in accordance with this Privacy Notice.

The data subject may revoke consent or object to certain processing activities in accordance with the procedure described in this Privacy Notice.

49. Contact Section

For any privacy-related question, request, objection, revocation, limitation, clarification, or ARCO rights request, please contact:

Axis Business Growth

Responsible Party / Data Controller: Arturo Sotomayor Hernández

Privacy Contact Email: contacttoarturo@gmail.com

Operating Model: Digital and remote operation. No public-facing physical office or retail address.

50. Legal Review Disclaimer

This Privacy Notice is a robust working draft designed for commercial, operational, website, proposal, onboarding, and contractual use. It is not a substitute for legal advice and should be reviewed, adapted, and validated by qualified local counsel before formal publication, implementation, or reliance, particularly to confirm legal requirements applicable to the final website, cookies, advertising tools, AI platforms, vendor stack, client data flows, international transfers, tax invoicing, sector-specific obligations, and contractual arrangements.

Annex A — One-Page Executive Privacy Notice

Summary version for quick reference

Axis Business Growth — Executive Privacy Notice

Responsible Party / Data Controller: Arturo Sotomayor Hernández

Trade Name: Axis Business Growth

Privacy Contact Email: contacttoarturo@gmail.com

Operating Model: Axis Business Growth operates digitally and remotely and does not maintain a public-facing physical office or retail address.

Axis Business Growth processes personal data in connection with digital technology consulting, AI automation, custom software development, business digitalization, CRM implementation, dashboards, data analytics, workflow automation,

WhatsApp Business automation, lead generation, digital marketing automation, AI customer service assistants, chatbots, web assistants, and managed digital services.

We may process personal data of clients, prospects, website visitors, users, suppliers, contractors, representatives of legal entities, business contacts, and individuals whose data is provided through client projects, systems, workflows, CRMs, documents, dashboards, or automation tools.

Personal data may include business contact information, identification and contact data, billing and tax data, commercial and contractual records, technical and usage data, cookie and analytics data, communications through email, WhatsApp, forms, calls, meetings, CRM systems, chatbots and support channels, and project-related data such as workflow information, operational records, documents, sales pipeline data, customer records, dashboard data, and automation inputs.

We process personal data for diagnostics, proposals, quotations, onboarding, service delivery, project execution, software configuration, AI automation, dashboards, reporting, support, billing, legal compliance, analytics, optimization, service improvement, commercial follow-up, marketing, and business development.

Axis Business Growth may use artificial intelligence and automation tools to classify information, generate drafts, support workflows, automate communications, analyze data, create reports, support customer service, and improve operational efficiency. We seek to apply reasonable safeguards, including confidentiality, access controls, minimization, and vendor review where commercially reasonable. Decisions may be supported by automation but are not generally intended to be made exclusively by automated means unless expressly disclosed.

We may use cookies, pixels, analytics tools, digital advertising platforms, CRM systems, WhatsApp Business tools, cloud providers, hosting providers, payment providers, communication tools, AI tools, automation platforms, and other technology vendors. As a result, personal data may be transferred, accessed, stored, or processed in Mexico or other jurisdictions where those providers operate.

We retain personal data for as long as reasonably necessary for service delivery, contractual performance, support, billing, tax, legal compliance, auditability, security, dispute prevention, and legitimate business needs. We apply reasonable administrative, technical, and organizational security measures, but no digital transmission or storage system is absolutely secure.

Data subjects may exercise ARCO rights — access, rectification, cancellation, and opposition — and may revoke consent, limit use or disclosure, or opt out of marketing communications by contacting contacttoarturo@gmail.com.

This executive notice is a summary. The complete Privacy Notice should be reviewed before providing personal data or using Axis Business Growth's services.

Annex B — Short Website Privacy Notice

Condensed notice for website footers and forms

Short Privacy Notice

Axis Business Growth, operated by Arturo Sotomayor Hernández, processes personal data to respond to inquiries, prepare diagnostics, proposals and quotations, provide digital technology consulting, AI automation, software development, CRM, dashboards, workflow automation, WhatsApp Business automation, digital marketing automation, customer service automation, support, billing, analytics, reporting, legal compliance, and business development services.

We may collect contact, business, billing, technical, cookie, analytics, communications, commercial, contractual, and project-related data. We may use cloud platforms, CRM systems, analytics tools, advertising platforms, WhatsApp Business tools, AI tools, automation providers, hosting providers, payment providers, and other technology vendors, which may involve national or international data transfers.

We may use artificial intelligence and automation to classify information, generate drafts, support workflows, automate communications, analyze data, create reports, and improve operational efficiency, applying reasonable safeguards where commercially feasible.

Axis Business Growth operates digitally and remotely and does not maintain a public-facing physical office or retail address.

To exercise ARCO rights, revoke consent, limit use or disclosure, or opt out of marketing communications, contact: contacttoarturo@gmail.com.

By using this website, submitting a form, contacting us, or providing personal data, you acknowledge this Privacy Notice and, where required, consent to the processing of your personal data in accordance with the full Privacy Notice.

Last updated: 14 June 2026

Annex C — Contract / Proposal Privacy Clause

Drop-in clause for proposals, SOWs and contracts

Privacy and Data Protection Clause

The Client acknowledges that Arturo Sotomayor Hernández, operating under the trade name Axis Business Growth, may process personal data in connection with the preparation, negotiation, execution, delivery, support, administration, billing, monitoring, optimization, and improvement of the services described in this proposal, statement of work, contract, or related communication.

Such processing may include personal data of the Client's representatives, personnel, contractors, users, customers, prospects, suppliers, or other individuals whose data is provided by the Client or processed through the systems, workflows, documents, databases, CRMs, dashboards, automations, AI tools, communication channels, or digital platforms involved in the project.

Axis Business Growth may process such data for diagnostics, project planning, service delivery, software configuration, AI automation, workflow automation, CRM implementation, dashboard development, reporting, support, billing, legal compliance, analytics, optimization, and operational improvement. Axis Business Growth may use third-party technology vendors, cloud-based providers, hosting platforms, CRM tools, WhatsApp Business tools, analytics providers, AI tools, automation platforms, communication providers, payment providers, and other service providers, which may involve national or international data transfers.

The Client represents and warrants that any personal data provided to Axis Business Growth has been collected and disclosed lawfully, with all required notices, consents, authorizations, legal bases, contractual permissions, and data subject information. The Client remains responsible for the legality, accuracy, relevance, proportionality, and quality of the data it provides.

Axis Business Growth will seek to apply reasonable administrative, technical, organizational, and confidentiality measures proportionate to the nature of the services, the data involved, the available technology, the agreed scope, and commercial feasibility. No digital system, cloud platform, AI tool, or transmission channel can be guaranteed to be absolutely secure.

Where required, the parties may execute additional data protection, confidentiality, security, or data processing terms to define roles, instructions, authorized processing, subprocessors, security controls, retention, deletion, international transfers, and incident management.

The Client and its representatives may review the applicable Privacy Notice and submit privacy-related requests to contacttoarturo@gmail.com.

Annex D — Checkbox Consent Language

Website / form consent statements

Website / Form Checkbox Consent

I confirm that I have read and understood the Privacy Notice of Axis Business Growth, operated by Arturo Sotomayor Hernández, and I consent, where legally required, to the processing of my personal data for the purposes of responding to my request, contacting me, preparing diagnostics, proposals or quotations, providing services, managing commercial follow-up, and using digital, cloud, CRM, analytics, WhatsApp Business, automation, and AI tools as described in the Privacy Notice.

Optional Marketing Checkbox

I agree to receive commercial communications, service information, resources, offers, follow-up messages, and marketing communications from Axis Business Growth. I understand that I may opt out at any time by contacting **contacttoarturo@gmail.com** or using any available unsubscribe mechanism.

Annex E — WhatsApp / Contact Form Privacy Language

Channel-specific privacy statements

WhatsApp Privacy Text

By contacting Axis Business Growth through WhatsApp, you acknowledge that Arturo Sotomayor Hernández, operating under the trade name Axis Business Growth, may process your name, phone number, messages, attachments, business information, and communication history to respond to your inquiry, provide information, prepare diagnostics, proposals or quotations, deliver services, manage follow-up, provide support, and maintain commercial records.

WhatsApp and related technology providers may process your data under their own terms and privacy policies. For privacy matters, ARCO rights, consent revocation, limitation of use or disclosure, or marketing opt-out requests, contact **contacttoarturo@gmail.com**.

Contact Form Privacy Text

By submitting this form, you acknowledge that Axis Business Growth, operated by Arturo Sotomayor Hernández, may process the personal data you provide to respond to your request, contact you, prepare diagnostics, proposals or quotations, provide services, manage commercial follow-up, perform analytics, and improve its services.

Axis Business Growth may use cloud tools, CRM systems, analytics platforms, communication tools, automation tools, WhatsApp Business tools, AI tools, and other technology providers. To exercise ARCO rights, revoke consent, limit use or disclosure, or opt out of marketing communications, contact **contacttoarturo@gmail.com**.

Annex F — Email Signature Privacy Language

Confidentiality footer for outbound email

Email Signature Privacy Notice

This email and any attachments may contain confidential information and personal data. If you are not the intended recipient, please notify the sender and delete this message. Axis Business Growth, operated by Arturo Sotomayor Hernández, may process personal data contained in email communications for contact management, commercial follow-up, service delivery, support, billing, legal compliance, security, and business administration purposes. For privacy matters or ARCO rights requests, contact contacttoarturo@gmail.com.

Annex G — Short Terms & Conditions Notice

Non-binding statement for proposals, quotations and digital materials

Terms & Conditions Notice

Information, proposals, estimates, timelines, deliverables, and pricing shared by Axis Business Growth or Arturo Sotomayor Hernández are non-binding unless confirmed in a written contract, accepted proposal, or formal statement of work.

Services are delivered remotely and remain subject to client cooperation, technical feasibility, third-party platforms, agreed scope, and applicable written terms.