

## Oxehealth – Privacy Notice – Customer

This Privacy Notice was last updated 24 June 2022 with the following changes:

- Change of name and contact details for Oxehealth's Data Protection Officer
- Change to data collected to include place of work and make it clear that address, phone and email information collected are work contact details
- More detail around purposes of data collected have been added
- Individual consent for staff surveys and interviews added to lawful basis
- Update to 'who your data is shared with' to include our UK support partners (Reliance Hi-Tech) and call recording service (ScoreBuddy).
- Update to contact details for exercising your rights.

### **Introduction**

This note sets out the way in which Oxehealth Limited processes the personal data held about you as customers (as established in the rules on giving privacy information to data subjects in Articles 12, 13 and 14 of the GDPR).

### **Identity and contact details of the Data Controller**

**Name:** Oxehealth Limited

**Address:** Magdalen Centre, The Oxford Science Park, Littlemore, North OX4 4GA

**Phone number:** 01865 900599

**Email:** info@oxehealth.com

**Website:** www.oxehealth.com

### **Contact details of the Data Protection Officer**

Oxehealth Limited's Data Protection Officer is Iain Charlton, who can be contacted at [privacy@oxehealth.com](mailto:privacy@oxehealth.com)**Error! Hyperlink reference not valid.** or on 01865 900599.

### **How do we get your information?**

We get information about you from the following sources:

- Directly from you
- From publicly available sources such as websites or directories

### **What information do we collect about you and what do we use it for?**

The information we may collect about you is as follows:

- Personal information (such as name, work address, work phone and email contact information, customer reference id, job role and place of work)
- Other information we collect for the processing purpose may include customer reference ID, organisation bank account details, signatures, meeting minutes and debrief notes, ward names, site plans, site details, nature and details of feedback responses or support requests including date & time.

This data may be collected and used for the following purposes:

- by Oxehealth's Finance team to process purchase orders and invoices and for communicating with you regarding the ongoing supply of services;

- by Oxehealth's Commercial team to provide you with commercial documentation including business cases, quotes, service agreements, SLAs, customer DPIA and to notify you of additional services becoming available which may be of interest to you;
- by Oxehealth's Customer Success team to arrange and carry out on-boarding meetings and provide minutes of those meetings, to arrange and facilitate staff training and engagement, to provide weekly usage reports, to respond to feedback from customers, and to maintain customer records (SOAPs) of key contacts required for providing the service;
- by Oxehealth's Operations team to organise and carry out the initial site visits and site installation, to provide ongoing site maintenance in response to customer requests or system alerts, to provide support and respond to customer issues received via the platform, email or phone call, and to record customer feedback and support requests; and
- by Oxehealth's Insights & Benefits team to conduct customer staff surveys and interviews and to collect interview transcripts.

#### **What is our lawful basis for processing your personal data?**

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(a) which relates to data processing where you have provided consent.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations.
- Article 6(1)(f) for the purposes of legitimate interest.

The data held about you is required in order to comply with our legal obligations as a supplier of yours, to perform our obligations to you or because there are legitimate reasons for doing so (and holding your data is necessary to achieve this interest). Customers also consent to the processing of their data sets by Oxehealth in the contracts signed and consent is always obtained from the individual when customer staff surveys and interviews are carried out.

#### **Who is your information shared with?**

Other than being used within Oxehealth by its employees, in addition to sharing your data with HMRC and other public authorities as required by law, your personal data may be routinely shared with:

- Atraxa Consulting Limited of Brookes Mill, Armitage Bridge, Huddersfield, West Yorkshire, HD4 7NR who provide accounting services on behalf of Oxehealth Limited (including the preparation and processing of VAT returns).
- Chartas Accounting Services Limited of Elm Tree Cottage, Leckhampstead, Newbury, RG20 8QY, who provide financial and administrative support to Oxehealth Limited (including the processing and payment of invoices)
- Reliance Hi-Tech of The Columbia Centre, Station Road, Bracknell, Berkshire, England, RG12 1LP who carry out installations at UK customer sites and provide support for the service to UK customers.
- Sentient Solutions Limited T/A Scorebuddy of The Masonry, 151, 156 Thomas St, Usher's Island, Dublin, D08 PY5E who provide call recording and scoring software for monitoring quality of customer support calls.
- Software Services used for day to day business activities - Microsoft, Google, Slack, Zendesk, Salesforce.

#### **Any transfers to third countries and the safeguards in place**

Oxehealth stores and processes the data of UK customers on our servers in the UK and on our software service provider servers. Where data is stored on software service providers servers in Europe the UK government has stated that transfers of data from the UK to the EEA are permitted. Where data is stored on software service provider servers outside the EEA standard contractual clauses are in place.

Oxehealth stores and processes the data of Swedish customers on our servers in the UK and on our software service provider servers. Where data is stored on software service provider servers in Europe this is permissible under EU GDPR. Where data is stored and processed on Oxehealth's servers or on software service provider servers in the UK, the EU has adopted an adequacy decision about the UK which allows data to flow freely to the UK from the EEA. Where data is stored on software service provider servers outside the EEA standard contractual clauses are in place.

### **How long will your information be held?**

We will hold your information whilst you are a customer of Oxehealth and, if you are no longer a customer to Oxehealth, for as long as is required in order to comply with legislative requirements – invoices which may contain your personal data, for example, will be retained for a period of 7 years in order to comply with HMRC requirements.

### **Security of your information**

The security of all information held and processed by Oxehealth is fundamental to the business. Any information is held securely in an office which has 24/7 security with restricted, electronically controlled access to staff members. Any information held in soft copy has access restricted only to those members of staff who require it to perform their roles or obligations.

### **What are your rights?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information.

Any subject data requests, complaints or objections should be made in writing to Oxehealth's Data Protection Officer: -

Data Protection Officer  
**Oxehealth Limited**  
**Magdalen Centre North**  
**Oxford Science Park**  
**Oxford, OX4 4GA**  
Email: [privacy@oxehealth.com](mailto:privacy@oxehealth.com)

### **How to make a complaint**

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact Oxehealth's Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

[www.ico.org.uk](http://www.ico.org.uk)