

## **Oxehealth - Privacy Notice - Employees**

### **This Privacy Notice was last updated 30 March 2023 with the following changes:**

- Change of name and contact details for Oxehealth's Data Protection Officer
- General updates to some wording of section headings
- Update to the introduction to give more information on the purpose of this Privacy Notice and what is included in it.
- Update identity and contact details to include OxehealthAB and Oxehealth Inc
- Update to how we store and keep your information secure to add more detail
- Update to 'who your data is shared with' to include more detail on third party software service providers we use when processing your data.
- Update to your data rights to give you a link to more information
- Update to complaints to include more contact information for supervisory authorities

### **Introduction**

At Oxehealth we respect your privacy and we want to be as transparent as possible about how we process your data including personal data

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

It is intended to explain who we are, who our Data Protection Officer is, how we collect your information, what information we collect about you and what we use it for, our lawful basis for processing your personal data, how we store and keep your information secure, how long we keep your information for, who your information is shared with, and transfers to third countries. This notice also explains your data rights, including your rights to access, correct, or restrict our use of your personal data, how to contact us about these rights, and how to contact us and the supervisory authorities in the event you have a complaint.

Oxehealth is the Data Controller for all processing activities covered in this Privacy Notice which means we decide how and why your data is processed, and the legal basis for processing.

### **Who we are**

Oxehealth, We, Us, Our refers to the following group of companies:

#### **Holding company and main office (UK)**

Oxehealth Limited

Registered in England and Wales, Company Registration Number 08163325

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

#### **Fully owned subsidiaries:**

Oxehealth AB

Registered in Sweden, Registration Number 559275-7487

Address: Nordenskiöldsgatan 11, 21119 Malmö

Oxehealth Inc

Registered in the United States of America, No. 3389479

Address: 9419 North Market Street, Suite 950 Wilmington, 19801 Delaware

## Our Data Protection Officer

Oxehealth is registered with the Information Commissioner's Office and details of our data protection officer can be found on the ICOs [register or fee payers](#).

## How we collect your information

We get information about you from the following sources:

- Directly from you.
- From recruiters and employment agencies.
- From your employer or academic institution if you are a secondee or intern.
- From referees, either external or internal.
- From security clearance providers.
- From government departments, for example tax details from HMRC.

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

We currently collect and process the following information:

- We use employment related information to carry out our contract with you and to provide you access to business services required to do your role.

Information used for this purpose includes: Personal information such as name, date of birth, address, phone and email contact information, staff number, national insurance number, copies of identification documents (eg passports), marital status, employment and education history, qualifications, next of kin and emergency contact details, responses to staff surveys (if not anonymised).

- We use information related to your salary and benefits to process payroll and provide your pension and other benefits.

Information used for this purpose includes: start and leave dates, job role, salary, allowances, working hours, pension preferences, details of your time spent working and any overtime, expenses or other payments claimed, details of any leave including sick leave, holidays, special leave etc, pension details, your bank account details, payroll records and tax status information, details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay

- We use information relating to your performance and training, e.g. to assess your performance, to conduct salary reviews, to award discretionary performance-related bonuses, and to deal with any employer / employee related disputes. We also use it to meet the training and development needs required for your role.

*Information used for this purpose includes:* Information relating to your performance at work eg probation reviews, promotions, performance and development plans and reviews, grievance and dignity at work matters and investigations to which you may be a party or witness, disciplinary records and documentation related to any investigations, hearings and warnings/penalties issued, whistleblowing concerns raised by you, or to which you may be a party or witness, information related to your training history and development needs

## 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)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest.

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise or defence of legal claims.

Most of the data held about you is required in order to comply with our legal obligations as an employer. Other information is held as you have provided your consent for Oxehealth to hold and process this data.

## How we store and keep your information secure

The security of all information held and processed by Oxehealth is important to us. Oxehealth has implemented an ISO 27001 certified information security management system which is audited to ensure that we have the appropriate technical and organisational controls in place to protect your data.

Oxehealth has policies in place to restrict printing of personal data - however where this is required any hard copy information is held securely in a locked cabinet in an office which has 24/7 security with restricted, electronically controlled access by staff members.

Any information held in soft copy is stored on local secure or approved secure cloud servers with access restricted only to those members of staff who require it to perform their roles or obligations.

## How long we keep your information for

We will hold your information whilst you are an employee and, after you leave Oxehealth, for as long as is required in order to comply with legislative requirements – for payroll purposes, this is for a period of 3 years after the end of the tax year in which you leave Oxehealth.

## Who your information is shared With

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors. For example, we may share information about you with HMRC for the purpose of collecting tax and national insurance contributions.

We also share your data with the following third party services or contractors for the purpose of performing certain services on your behalf.

Third Party Service / Contractor	Purpose	Location
<a href="#">Atraxa Consulting Limited</a>	UK Payroll processing	Brookes Mill, Armitage Bridge, Huddersfield, West Yorkshire, HD4 7NR
<a href="#">Unaterra Consulting Limited</a>	US Payroll	Maling Exchange, Hoults Yard, Walker Road, Newcastle upon Tyne, NE6 2HL

<a href="#">Bookwise A/B</a>	Sweden Payroll	P.O. BOX 384, 101 27 Stockholm, Sweden
<a href="#">BUPA UK</a>	UK private health insurance provider	1 Angel Court, London, EC2R 7HJ
<a href="#">Howden Group</a>	UK health insurance broker	One Creechurch Place, London, EC3A 5AF
<a href="#">Scottish Widows</a>	UK pension provider	25 Gresham Street, London, EC2V 7HN
<a href="#">Aviva</a>	Life insurance	Aviva, PO Box 7684, Pitheavlis, Perth PH2 1JR
<a href="#">Lift Financial</a>	Life insurance and pensions broker / advisor	Century House, Regent Road, Altrincham, Cheshire, WA14 1RR
<a href="#">Linder &amp; Partners</a>	Sweden pensions and insurance broker	Kungsgatan 59, 3 tr 111 22 STOCKHOLM
<a href="#">CBS</a>	Baseline Personnel Security Screening	5 St John's Lane, London, EC1M 4BH
<a href="#">Trust ID</a>	Right to work checks	TrustID Ltd, The Blade, Abbey Street, Reading, Berkshire, United Kingdom, RG1 3BA
<a href="#">The Employment Services Partnership Limited</a>	Advice on right to work queries and or other employment law queries	c/o Cater Leydon Millard, 68 Milton Park, Abingdon, Oxfordshire, OX14 4RX
<a href="#">Speedlink</a>	Courier equipment to new starters and collect equipment from leavers	The Hub, Farnborough Business Park, Fowler Avenue Farnborough Hampshire, GU14 7JF
<a href="#">SVB</a>	Banking portal through which employee salary payments are made	Alphabeta, 14-18 Finsbury Square, London EC2A 1BR
<a href="#">NatWest</a>	Banking portal through which employee salary payments are made	36 St Andrew Square, Edinburgh, United Kingdom, EH2 2YB

In addition Oxehealth uses the following cloud service providers for the processing activities outlined above and your data may be stored on the servers owned by these providers.

Software Service (click link for privacy notice)	Purpose	Storage Location	Third Country Data Transfer Mechanism
<a href="#">Microsoft Office 365</a>	Distributing employee onboarding and leaver information to relevant teams. Sending employment related information such as contracts, P45s etc. to employees Use of Microsoft sheets for collecting payroll data	United Kingdom	Adequacy Decision (EU to UK)  Standard contractual clauses with US organisation.

<a href="#">Google Workspace</a>	Storage of employee records including but not limited to signed contract, right to work and security screening checks, and payroll information	Europe	Adequacy Decision EU to UK and permitted by UK government.  Standard contractual clauses with US organisation.
<a href="#">PeopleHR</a>	HR system for booking holiday and sick leave, recording staff and emergency contact details and performance reviews and storing employee records including but not limited to signed contract, right to work and security screening checks, and payroll information	United Kingdom / Europe	Adequacy Decision EU to UK and permitted by UK government.
<a href="#">DocuSign</a>	Electronic signing of employee contract	United States	Binding Corporate Rules
<a href="#">Access LMS</a>	Provision of training material and other onboarding documents	United Kingdom / Europe	Adequacy Decision EU to UK and permitted by UK government.
<a href="#">Sage Payroll</a>	Calculating tax and net pay information and producing payslips	United States / Canada	Standard Contractual Clauses and UK Addendum or International Data Transfer Agreement (IDTA)
<a href="#">Zoho</a>	Providing contact details to IT for initial IT setup and onboarding for new starters.	Europe	Adequacy Decision EU to UK and permitted by UK government.

## Transfers to third countries and the safeguards in place

Oxehealth stores and processes the data of its employees in cloud service provider servers as outlined above. This may involve data processing on servers of an international organisation or the transfer of employee data to a different country. We rely on the following transfer mechanisms for the transfer of this data:

Data transfer from the UK to the EU: The UK government has stated that transfers of data from the UK to the EEA are permitted

Data transfer from the EU to the UK: The EU have adopted an adequacy decision about the UK which allows data to flow freely to the UK from the EEA

Data transfer from the UK and EU to the USA or other third countries: Oxehealth ensures either binding corporate rules or standard contractual clauses are in place and carry out assessments to ensure appropriate security measures have been implemented to protect the data.

## Your Data Rights

GDPR gives you certain legal rights which mean you have an amount of control over the personal data which we process. These include the right to

- access your personal information
- to object to the processing of your personal information
- to correct any mistakes or errors in the information we hold on you
- to ask us to erase any information we hold on you
- to restrict how we process your information
- and to ask us to port your personal information to another provider.

More information about these rights can be found here UK: <https://ico.org.uk/your-data-matters/> or here Sweden: The-data subjects rights

You can enquire about or request to exercise any of these rights by contacting Oxehealth's Data Protection officer by email to [privacy@oxehealth.com](mailto:privacy@oxehealth.com) or by letter to the following address:

Data Protection Officer  
Oxehealth Limited  
Magdalen Centre North  
Oxford Science Park  
Oxford, OX4 4GA

## In the event you have 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 relevant supervisory authority for a decision. You may contact them as follows:

### **United Kingdom**

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Tel: 0303 123 1113 (Monday to Friday 9am to 5pm)  
Website: <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

### **Sweden**

IMY - Swedish Authority for Privacy Protection  
Integritetsskydd Myndigheten, Box 8114, 104 20 Stockholm, Sweden  
Tel: +46 (0)8 657 61 00 (Monday to Friday 9am to 12pm)  
Email: [imy@imy.se](mailto:imy@imy.se)  
Website: [www.imy.se](http://www.imy.se)