

Oxehealth – Privacy Notice – Customer

This Privacy Notice was last updated 5 May 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 Oxehealth AB 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 Privacy Notice 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).

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, 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 publicly available sources such as websites or directories

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

The information we may collect about you is as follows:

- personal information we collect about you may include your name, job role, place of work, work address, work phone and email contact information
- 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.
- by Oxehealth's Insights & Benefits team to conduct customer staff surveys and interviews and to collect interview transcripts.

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 reason). 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

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 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.

Who your information is 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 the following third party services or contractors:

Third Party Service / Contractor	Purpose	Location	Third Country Data Transfers
Atraxa Consulting Limited	Provide accounting services on behalf of Oxehealth Limited (including the preparation and processing of VAT returns)	Brookes Mill, Armitage Bridge, Huddersfield, West Yorkshire, HD4 7NR	N/A
Reliance Hi-Tech	Installations at UK customer sites	The Columbia Centre, Station Road, Bracknell, Berkshire, England, RG12 1LP	N/A Only process data of UK customers
3C Online Limited	Providing 1st level of support for users of the Oxevision system, call and ticket management through Oxehealth provided customer support system.	Unit 3 Bickles Yard, 151-153 Bermondsey Street, London, SE1 3HA	Adequacy Decision (UK/EU)

BDR Technical Solutions Limited	Providing installation of hardware and equipment which form part of the Oxevision system on customer sites.	Unit 11, 2m Trade Park, Beddow Way, Aylesford, Kent, ME20 7BT	N/A Only process data of UK customers
Aceda	Providing installation of hardware and equipment which form part of the Oxevision system on customer sites.	Ellerbeck House, 20 Ellerbeck Way, Stokesley, Middlesbrough, TS9 5JZ	N/A Only process data of UK customers
Great Security	Oxehealth's distribution partners in Sweden and provide installation services and customer support for Swedish customers	Kabingatan 9 212 39 Malmö Sweden	N/A Only process data of Sweden customers

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
Salesforce	Communicating with customers re ongoing supply of services	United States, Canada, Germany, France, United Kingdom, Japan, Australia	Salesforce Binding Corporate Rules, EU Standard Contractual Clauses, and UK Addendum
Microsoft Office 365	Communicating with and providing information to customers	United Kingdom	Adequacy Decision (EU to UK)
Google Workspace	Storing customer contact information for providing the service	United States, Europe	Model Contract Clauses
Slack	Internal communications to support all activities	United States	Standard Contractual Clauses
Zendesk	Processing and recording customer feedback and support tickets	United States, Ireland, Germany, Japan, Australia	Zendesk Binding Corporate Rules, EU Standard Contractual Clauses, and UK Addendum
Otter.ai	Transcription service for transcribing staff interviews	United States	EU Standard Contractual Clauses, and UK Addendum
Calendly	Booking meetings and	United States	EU Standard Contractual

	training with Customer Success Team		Clauses, and UK addendum
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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 cloud service provider servers as outlined above. Where data is stored on 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 servers in the USA or other third countries binding corporate rules or standard contractual clauses are in place and Oxehealth has assessed the security measures in place to ensure an adequate level of protection of the data.

Oxehealth stores and processes the data of Swedish customers on our servers in the UK and on our cloud service provider servers as outlined above. Where data is stored on servers in Europe this is permissible under EU GDPR, Where data is stored and processed in the UK the EU have adopted an adequacy decision about the UK which allows data to flow freely to the UK from the EEA. Where data is stored on servers in the USA or other third countries binding corporate rules or standard contractual clauses are in place and Oxehealth has assessed the security measures in place to ensure an adequate level of protection of 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 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

Live chat: <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

Website: www.ico.org.uk

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

Website: www.imy.se