

Oxehealth – Privacy Notice – Supplier

This Privacy Notice was last updated 4 April 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 to identity and contact details to include Oxehealth AB and Oxehealth Inc
- Update to who 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 contact details for exercising your rights
- 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 a supplier (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 other publicly available sources, eg websites, 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 such as name, address, phone and email contact information, supplier reference id, job role
- In some cases, bank details (relevant if, for example, you are a sole trader using a single bank account for both personal and business purposes)

We use this data:

- to enable contact with a specific individual at a supplier in order to make decisions on procurement, to procure goods and services, to be able to pay a supplier and to discuss customer service issues
- within our finance systems and supplier master files in order to process purchase orders and invoices and make payments to suppliers

Our lawful basis for processing your personal

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.
- Article 6(1)(f) for the purposes of legitimate interest.

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 supplier of Oxehealth and, if you are no longer a supplier 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 is your information shared with?

In addition to sharing your data with HMRC and other public authorities as required by law, your personal data will be routinely shared with the following third party contractors:

| Third Party Service / Contractor | Purpose | Location |
|---|--|--|
| 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 |
| Bookwise AB | Provide financial and administrative support to Oxehealth Limited in respect of our Swedish operations | PO Box 384, 101 27 Stockholm Sweden |
| SVB | Banking portal through which supplier payments are paid | Alphabeta, 14-18 Finsbury Square, London EC2A 1BR |
| NatWest | Banking portal through which supplier payments are paid | 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 |
|--|---|------------------|--|
| Google Workspace | Storing supplier information as part of supplier assessment | Europe | Adequacy Decision EU-UK Data protection agreement signed with Google workspace includes standard contractual clauses for processing by a US organisation. |
| Sage Online50 | Storing supplier details to support processing invoices | United Kingdom | N/A |

Transfers to third countries and the safeguards in place

For data transfers between the UK and the EU we rely on the European Commission's Adequacy decision on the UK, and the UK government's statement that transfers of data from the UK to the EEA are permitted.

For data transfers to Canada we rely on the UK and the European Commission's Adequacy decisions on Canada.

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