

Oxehealth - Privacy Notice - Investor

This Privacy Notice was last updated 04 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 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 give you 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 investors (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

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

We currently collect and process personal information which enables us to identify you, contact you in relation to investor relations matters, to issue legal documents (e.g., share certificates), to submit our statutory filings to Companies House and, where relevant, to HMRC.

Information used for this purpose includes: Your name, address, phone and email contact information, and in some cases your bank details.

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.
- 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 shareholder of Oxehealth and, if you are no longer a shareholder of Oxehealth, for as long as is required in order to comply with legislative requirements.

Who your information is shared with

In addition to sharing your data with relevant government agencies including HMRC and Companies House, your personal data will also be shared with the following third party contractors:

| Third Party Service / Contractor | Purpose | Location |
|------------------------------------|--|--|
| Bristows LLP | Corporate Legal Advisors | 100 Victoria Embankment London EC4Y 0DH |
| Neville Registrars | Provide financial and administrative support to Oxehealth Limited (including the processing and payment of invoices) | Neville House Steelpark Rd Halesowen B6 2 8HD |

Your personal data will also be shared with our corporate legal advisors, Bristows LLP of 100 Victoria Embankment, London, EC4Y 0DH, as well as our registrars, Neville Registrars of Neville House, Steelpark Rd, Halesowen B62 8HD.

We may, from time to time, share our “cap table” which lists our shareholders by name and the number of shares held by each (as recorded at Companies House) for example when going through due diligence with a new advisor or supplier. We do not include contact information in this document.

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 | To keep an internal register of investors | Servers are located in Europe | Adequacy Decision EU to UK and permitted by UK government. Data Protection Agreement signed with Google Workspace includes standard contractual clauses for data processing by a US organisation. |

Transfers to third countries and safeguards in place

Your data will not be transferred outside of the EU at any time.

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