

## **Oxehealth – Privacy Notice – Research Study Participant**

This Privacy Notice was last updated 4 April 2023 with the following changes:

- Minor corrections of punctuation
- Update to link for contacting the ICO
- Update to 'Our Data Protection Officer' to link to the fee payers register for details

### **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 research study participants or potential participants (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 when you apply to be a research study participant.

## **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, age, sex, ethnicity, Fitzpatrick skin type, pre-existing sleep conditions, phone number, and email address.
- Should you be selected to take part in the research study, you will be provided with a consent form that you will be able to review prior to any further data being collected.
- Other information we collect for the processing purpose may include bank account details, signatures, nature and details of feedback responses including date & time.

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

- by Oxehealth's Operations team for communicating with you about the research study, to assess your suitability to take part, and to schedule study sessions.
- by Oxehealth's Finance team to process payment to compensate you for your time in the study.
- by Oxehealth's Research team to collect metric data on percentage suitable candidates, to provide support and respond to queries received via email or phone call.
- by Oxehealth teams to carry out analyses as described in the study protocol referred to in the consent form.

## **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)(f) for the purposes of legitimate interest.

The data held about you is required in our legitimate interests of assessing interested candidates for participating in the research study and once candidates are selected further personal data gathered during the study is collected after consent is obtained from the participant.

## **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 collected as part of the screening for suitable study candidates for the duration of the research study, after which it will be deleted. If you take part in the study, demographic information about you will be anonymised at the start of the study and stored under the terms of the consent form signed prior to participation in the study.

## Who Your Information is Shared With

Other than being used within Oxehealth by its employees, your personal data may be routinely shared with the following third party services or contractors:

- Contracted sleep technicians, who provide technical support in the execution of the study protocols, including calling study participants in advance of the scheduled study date

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>	Communicating with and providing information to participants	United Kingdom	Adequacy Decision (EU to UK)
<a href="#">Google Workspace</a>	Storing participant information for executing study protocol	United States, Europe	Model Contract Clauses
<a href="#">Slack</a>	Internal communications to support all activities	United States	Standard Contractual Clauses

## Transfers to third countries and the safeguards in place

Oxehealth stores and processes data collected from research studies 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 standard contractual clauses are in place.

## 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: <https://ico.org.uk/your-data-matters/>

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