

## Oxehealth - Privacy Notice - Investor

### **Introduction**

The General Data Protection Regulations (GDPR) comes into effect on May 25<sup>th</sup> 2018. This note sets out the way in which Oxehealth Limited processes the personal data held about you (as established in the rules on giving privacy information to data subjects in Articles 12, 13 and 14 of the GDPR).

The GDPR states that a privacy notice must be supplied to an individual at the time they provide Oxehealth with their personal data. The GDPR says that the information provided to people about how Oxehealth processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

### **Identity and contact details of the Data Controller**

Oxehealth Limited is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR), w.e.f. 25 May 2018.

### **Contact details of the Data Protection Officer**

Oxehealth Limited has a Data Protection Officer who can be contacted through [info@oxehealth.com](mailto:info@oxehealth.com) or on 01865 900599.

### **What information do we collect about you?**

The GDPR defines **personal data** as the following:

‘Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;’

Personal data relating to an employee can include: name, job title, date of birth, passport data, home address, home telephone number, private email address, emergency contact, staff number and so on.

‘**Special categories**’ of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

The information we may collect about you is as follows:

- personal information (such as name, address, phone and email contact information)
- bank account details

### **How will your information be used?**

We use this data:

- to enable contact with a shareholder or specific individual at a shareholder in order to issue shareholder communications and legal documents
- to process payments to a shareholder
- to make filings with HMRC as required by the law

### What is our legal basis for processing your personal data?

For processing to be lawful under the GDPR, Oxehealth needs to identify a lawful basis before we can process your personal data. It is important that we determine the lawful basis for processing your personal data and document this. The bases applying to you are shaded in the boxes below.

If we are processing personal data then you must satisfy a condition under Article 6 and if you are processing special category data then we must satisfy a condition under Article 6 **and** Article 9.

Article 6 - Personal Data	Article 9 - Special Categories
The data subject has given <b>consent</b> to the processing	The data subject has given <b>explicit consent</b> to the processing
Processing is necessary for the performance of a <b>contract</b> with the data subject	Processing is necessary for the purposes of carrying out the obligations of the controller or of the data subject in the field of <b>employment</b>
Processing is necessary for compliance with a <b>legal obligation</b>	Processing is necessary to protect the <b>vital interests</b> of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
Processing is necessary in order to protect the <b>vital interests</b> of the data subject or of another natural person	Processing is carried out in the course of its legitimate activities by a foundation, association or any other <b>not-for-profit</b> body with a political, philosophical, religious or trade union aim.
Processing is necessary for the performance of a task carried out in the <b>public interest</b>	Processing relates to personal data which are made <b>public</b> by the data subject
Processing is necessary for the purposes of the <b>legitimate interests</b> pursued by the controller or by a third party.	Processing is necessary for the establishment, exercise or defence of <b>legal claims</b> or whenever courts are acting in their judicial capacity
	Processing is necessary for reasons of <b>substantial public interest</b>
	Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of <b>health or social care</b> or treatment, or the management of health or social care systems
	Processing is necessary for reasons of public interest in the area of <b>public health</b>
	Processing is necessary for <b>archiving purposes</b> in the public interest, scientific or historical research purposes or statistical purposes

The data held about you is required in order to comply with our contractual obligations to you as a shareholder, our legal obligations to HMRC or because there are legitimate reasons for doing so (and holding your data is necessary to achieve this interest).

### Who receives your information?

We do not share information about suppliers without consent unless the law and our policies allow us to do so. 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 will be routinely shared with:

- Bristows LLP of 100 Victoria Embankment, London, EC4Y 0DH (legal advisors to the company)

## **Any transfers to third countries and the safeguards in place**

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

## **How long will your information be held?**

We will hold your information whilst you are a shareholder 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.

## **Security of your information**

The security of all information held and processed by Oxehealth is fundamental to the business. Any information is held securely in an office which has 24/7 security with restricted, electronically controlled access to staff members. Any information held in soft copy has access restricted only to those members of staff who require it to perform their roles or obligations.

## **What are your rights?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information.

Any subject data requests, complaints or objections should be made in writing to Oxehealth's Data Protection Officer: -

**Chief Operating Officer**  
**Oxehealth Limited**  
**Magdalen Centre North**  
**Oxford Science Park**  
**Oxford, OX4 4GA**  
**Email: [info@oxehealth.com](mailto:info@oxehealth.com)**

## **How to make 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 Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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