

Investor Privacy Notice

Effective 9 June 2025

Oxehealth Limited and/or its subsidiaries ("Oxehealth", "we", "us", or the "Company") are responsible for the processing of your Personal Data as described in this Privacy Notice, unless specified otherwise. As the controller of your Personal Data, we determine how and why your data is processed and ensure that all processing activities comply with applicable legal requirements.

At Oxehealth, we respect your privacy and we want to be as transparent as possible about how we collect, use, and protect your data, including Personal Data. For the purposes of this Privacy Notice, "Personal Data" means any information that relates to an identified or identifiable individual and includes what may be referred to as "Personal Information" under applicable US privacy laws.

As a Data Controller we are committed to complying with the relevant data protection laws in the jurisdictions where we operate. This includes but is not limited to the EU and UK General Data Protection Regulations and the California Consumer Privacy Act (as amended by the California Privacy Rights Act).

This Privacy Notice applies specifically to Oxehealth investors and shareholders and sets out the way in which we process, protect, and manage your Personal Data. This includes data provided directly by you or collected from others.

In this notice we will 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.

1. 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: Bee House, Eastern Avenue, Milton Park, Abingdon, England, OX14 4SB

Fully owned subsidiaries:

Oxehealth Inc

Registered in the United States of America, No. 3389479

Address: 9419 North Market Street, Suite 950 Wilmington, 19801 Delaware

Oxehealth AB

Registered in Sweden, Registration Number 559275-7487

Address: Nordenskiöldsgatan 11, 21119 Malmö

2. What Personal Data we may collect about you, what we use it for, where we collect it from and our legal basis for processing

Maintain Registers of Shareholders & Investors

To comply with legal requirements to maintain a register of members we may collect and use the following information.

| What Personal Data we collect and use | Where we collect your Personal Data from |
|---|--|
| <ul style="list-style-type: none">• Shareholder or Investors Names• Email Address• Postal Address• Company number (if applicable)• Details of shares held• Dates of membership | <ul style="list-style-type: none">• Directly from the individual |

Oxehealth has a legal obligation under Companies Act 2006, s113–s123 to maintain a register of shareholders.

Issue Legal Documents

To formalise and document the rights and obligations of shareholders and issue other legal documents (e.g. share certificates) we may collect and use the following information:

| What Personal Data we collect and use | Where we collect your Personal Data from |
|--|--|
| <ul style="list-style-type: none">• Shareholder Name• Signature | <ul style="list-style-type: none">• Directly from the individual |

Oxehealth relies on contractual obligations for entering into shareholder agreements with shareholders.

Record Shareholder Payments to Oxehealth

To maintain records of shareholder payments we may collect and use the following information:

| What Personal Data we collect and use | Where we collect your Personal Data from |
|--|--|
| <ul style="list-style-type: none">• Shareholder Name• Amount Paid | <ul style="list-style-type: none">• Directly from the individual |

Oxehealth has a legal obligation under Companies Act 2006 for statutory and financial record keeping.

Use of CCTV on Oxehealth Premises:

Oxehealth uses CCTV in selected areas of its premises for the purposes of physical security and access control. Cameras are positioned at entry points and within internal areas where there is a need to monitor access to sensitive infrastructure such as server equipment and stock.

CCTV may also operate in shared office areas and access routes. Cameras are not installed in private areas such as bathrooms or meeting rooms. The system does not record sound or use facial recognition or biometric technologies. CCTV footage is video-only.

If you visit our premises, you may be recorded on CCTV when entering or walking through monitored areas.

| What Personal Data we collect and use | Where we collect your Personal Data from |
|--|---|
| <ul style="list-style-type: none"> Video recordings of individuals walking through or entering areas adjacent to secure infrastructure (e.g., entrance to the demo and experiment suite). | <ul style="list-style-type: none"> CCTV cameras located on company premises. |

Oxehealth has a legitimate interest in maintaining physical security, preventing unauthorised access to critical infrastructure, and protecting its property and systems.

3. How we keep your Personal Data Secure

The security of all data held and processed by Oxehealth is important to us. Oxehealth has implemented an ISO 27001 and ISO 27701 certified information security and privacy management system which is audited to ensure that we have the appropriate technical and organisational controls in place to protect your Personal Data.

Oxehealth maintains physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of Personal Data. Our security and privacy procedures mean that we may request proof of identity before we disclose Personal Data to you.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

4. How long we keep your Personal Data for

Oxehealth retains shareholder and investment information for the lifetime of the company plus an additional 20 years to align with the legal obligation to retain a register of shareholders for this period.

5. Who your Personal Data 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 |

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 and shareholders, and store other information including legal documents and records of payments. | Servers are located in Europe | Adequacy Decision (EU to UK) EU-US Data Privacy Framework with UK extension. |

6. Location of Personal Data

We may sometimes transfer to, store or host information with third party service providers based outside the UK and/or the European Economic Area (EEA), including countries where the law may provide less protection for personal information.

When we transfer Personal Data to other jurisdictions, we will ensure that the data is transferred in accordance with this Privacy Notice, that the recipient offers adequate levels of protection and security, and as permitted by applicable data protection laws.

The transfer mechanisms we rely on for transfers to these jurisdictions include the adequacy Adequacy decision between the UK and the EU for transfers to EU countries, the EU-US DataPrivacy Framework with the UK extension for data transfers to the USA, or where these can't be relied on binding corporate rules and/or standard contractual clauses with the UK addendum.

If we engage a third party to process personal information on our behalf, we contractually require them to apply appropriate safeguards for personal information.

7. Your Personal Data Rights

You may have certain legal rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws these rights may include the right to:

- Access the personal data we hold about you.
- Learn more about how we process your personal data..
- Correct any inaccurate or incomplete personal data we hold about you.
- Request the deletion or erasure of your personal data where applicable.
- Restrict or object to the processing of your personal data including for direct marketing purposes.
- Obtain a copy of your personal data in a portable format or request that we transfer it to another provider.
- Opt out of certain types of processing, including the sale of personal data (note: we do not sell personal data) or sharing of your personal data for targeted advertising, where applicable under local laws.
- Not be subject to decisions based solely on automated processing, including profiling, which produce a legal or similarly significant effect on you.

To exercise any of these rights, please contact us using the contact details below. We will respond to your request as required by applicable law, typically within one month. In some cases, we may need additional time due to the complexity or volume of requests, in which case we will notify you.

Where permitted by law, we may require proof of your identity before fulfilling your request. In some cases, we may decline a request if it is manifestly unfounded, excessive, or otherwise not required by applicable law, but we will provide an explanation in such instances.

Direct Marketing

You have the right to object to the use of your personal information for direct marketing at any time. You do not need to provide a specific reason for such objection, and we will honour your request promptly.

Non Discrimination

Oxehealth respects and upholds applicable data protection rights and ensures that no unfair treatment or discrimination occurs as a result of exercising those rights.

Automated Decision Making

We do not currently engage in decision-making based solely on automated processing, including profiling, that produces legal or similarly significant effects.

8. Contacting Us

Oxehealth is registered with the Information Commissioner's Office (ICO) in the UK and has appointed a Data Protection Officer (DPO) to oversee compliance with all data protection laws in the jurisdictions in which we operate. You can find details of our registration and the data protection officer on the ICO's [register of fee payers](#).

To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Statement or our privacy practices please email us at privacy@oxehealth.com, call us at +44-1865-900599, or write to us at:

Oxehealth Data Protection Officer
Bee House
140 Eastern Avenue
Milton Park
Oxfordshire, OX14 4SB
United Kingdom

When you contact us please indicate what country and state you reside in so we can address your inquiry appropriately.

9. In The Event You have a Complaint

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If you are unhappy with the way in which your Personal Data has been processed please 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
Tel: 0303 123 1113
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
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

United States

If you are based in the United States, you may contact the following organisations:

Federal Trade Commission (FTC): File a complaint via <https://reportfraud.ftc.gov>

Your State's Attorney General: A directory of state Attorneys General is available at <https://www.naag.org>

California residents: For complaints under the California Consumer Privacy Act (CCPA), you may contact the California Privacy Protection Agency (CPPA) via their website at www.ccpa.ca.gov

10. Review and Update of Privacy Notices

Oxehealth will review and update our Privacy Notices from time to time to reflect changes in our practices, technologies, legal requirements and other factors. If we do, we will update the 'effective date' at the top of this page. We encourage you to periodically review this Privacy Notice to stay informed about our collection, processing and sharing of your Personal Data.