

Research Study Participant Privacy Notice

Effective 10 January 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 research study applicants and participants 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

Enrolling you on a research study

To communicate with you about the research study, to assess your suitability to take part, and to schedule study sessions 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">• Name• Email• Telephone Number• Age• Sex• Height• Weight• Fitzpatrick skin type• Gender• Ethnicity• Existing medical conditions	<ul style="list-style-type: none">• Directly from the individual

Oxehealth has a legitimate interest to recruit and screen potential study participants for approved research studies. Oxehealth uses explicit consent to collect sensitive special category personal information.

Processing Payments

To process payment to compensate you for your time in the study 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">• Name• Bank Account Details	<ul style="list-style-type: none">• Directly from the individual

Oxehealth has a legitimate interest to process bank account details to compensate research study participants for their time.

Carrying out Research

To carry out analyses as described in the study protocol referred to in the consent form 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"> • Video Footage • Health data including sleep patterns, pulse rate and breathing rate 	<ul style="list-style-type: none"> • Directly from the individual

Oxehealth uses explicit consent from research study participants to collect this data. Participants can withdraw consent at any time during the study. Further information is provided on the consent form.

Additional Lawful basis for processing of special category personal information

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(a) Explicit Consent

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

The length of time your data will be held for will be determined by the research study protocol which is approved by the research ethics committee and can differ from one study to another. All data collected for the research study will be deleted at the end of the retention period detailed in the protocol. This protocol will be shared with you when you apply to participate in any research study.

5. Who your Personal Data 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 or for general day to day running of the business, your data may be stored on the servers owned by these providers. Where available links to their privacy notices are attached. Third party service providers may change and while Oxehealth endeavours to keep this list up to date as these changes happen, we request you do not rely on this but contact us using the details in section 8 (Contacting Us) for the most up to date list.

Software Service (click link for privacy notice)	Purpose	Storage Location	Third Country Data Transfer Mechanism
Microsoft Office 365	Communicating with and providing information to participants	United Kingdom	Adequacy Decision (EU to UK) EU-US Data Privacy Framework with UK extension.
Google Workspace	Storing participant information for executing study protocol	United States, Europe	Adequacy Decision (EU to UK) EU-US Data Privacy Framework with UK extension.
Slack	Internal communications to support all activities	United States	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.