



# Research Study Participants Privacy Notice

## Effective 17 December 2025

Oxehealth Limited t/a LIO and/or its subsidiaries (“LIO”, “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 LIO, 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 current and past LIO research study 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

LIO, We, Us, Our refers to the following group of companies:

### **Holding company and main office (UK)**

Oxehealth Limited t/a LIO

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 it.

### Research Study Participant Communication and Administration

To communicate with potential study participants about research studies and product development activities, to respond to expressions of interest, and to administer and schedule participation in studies, training sessions or interviews we may collect the following information:

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>Participant Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Parent or legal guardian name and contact details (where participant is under 18)</li> </ul>	<ul style="list-style-type: none"> <li>Directly from you or your parent or legal guardian, or from third parties (e.g. friends and family) with your consent.</li> </ul>

LIO has a legitimate interest in communicating with potential participants, administering recruitment activities, and arranging and scheduling participation in research studies, training sessions and interviews.

### Research Study Participant Screening and Suitability Assessment

To carry out initial screening and assess the suitability of potential participants for research studies and product development activities we may collect the following information (depending on the type of study):

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>Applicant Name</li> <li>Age or date of birth</li> <li>Sex</li> <li>Height</li> <li>Weight</li> <li>Fitzpatrick skin type</li> <li>Lifestyle factors (e.g. smoking &amp; drinking &amp; caffeine consumption)</li> <li>Medical Conditions</li> <li>Job role, place of work and number of years experience as a health professional</li> </ul>	<ul style="list-style-type: none"> <li>Directly from you or your parent or legal guardian</li> </ul>

LIO has a legitimate interest in assessing the suitability of participants for product development, validation activities and research studies. Where screening involves personal data that may reveal an individual's health status, LIO relies on the participant's explicit consent and applications may withdraw consent at any time by calling or writing to us using the details provided in section 8 (contact us).

### Research Study Participation and In-Study Collection

To conduct in-house research studies involving human participants in order to support algorithm development, product development and validation activities, including collecting study data in accordance with the study protocol, and analysing study outputs we may collect the following information (depending on the type of study):

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>● Participant Name</li> <li>● Age or date of birth</li> <li>● Sex</li> <li>● Height</li> <li>● Weight</li> <li>● Fitzpatrick skin type</li> <li>● Lifestyle factors (e.g. smoking status, alcohol consumption &amp; caffeine intake)</li> <li>● Medical Conditions (where relevant to the study)</li> <li>● Study specific data recorded in case report forms (as defined in the study protocol)</li> <li>● Video recordings captured during the study</li> <li>● Audio recordings captured during the study (where applicable).</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you.</li> </ul>

Participation in research studies is voluntary, and personal data (including special category personal data) is collected and processed only where you have provided explicit consent. Full details of the data collected are set out in the relevant study protocol and are explained to participants as part of the consent process. Participants may withdraw consent at any time by calling or writing to us using the details provided in section 8 (contact us).

### Participant Reimbursement and Compensation

To reimburse participants for reasonable travel expenses incurred in connection with participation in a research study and, where applicable, to compensate participants for their time.

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>● Participant name</li> <li>● Bank account details (e.g. account number and sort code)</li> <li>● Payment amount and payment reference</li> <li>● Records of reimbursements or compensation payments</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you and generated by LIO</li> </ul>

LIO has a legitimate interest in administering payments to participants and maintaining appropriate financial records.

## Research Study Interview Feedback and Analysis

To record, pseudonymise and analyse feedback provided during interviews and study interactions:

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>Participant Number</li> <li>Interview Feedback and responses</li> <li>Interview observations and notes</li> </ul>	<ul style="list-style-type: none"> <li>Directly from you and created by LIO during interviews or study activities.</li> </ul>

Interview feedback is collected and processed only where you have provided explicit consent, is pseudonymised as soon as practicable and is used only for analysis and evaluation purposes in accordance with the relevant study protocol.

## Research Study Data Use for Regulatory Compliance

To use research study data to support regulatory compliance and conformity assessment activities for LIO products, including review of anonymised data by authorised third-party contractors acting on LIO's behalf.

What Personal Data we collect and use	Where we collect your Personal Data from
<ul style="list-style-type: none"> <li>Anonymised study data collected during participation (as defined in the study protocol)</li> <li>Anonymised study outputs and analysis results.</li> </ul>	<ul style="list-style-type: none"> <li>From data collected during the study or generated by LIO during analysis.</li> </ul>

Data shared with Contractors does not contain any personally identifiable information and contractors act under contractual obligations of confidentiality..

## 3. How we keep your personal data secure

The security of all data held and processed by LIO is important to us. LIO 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.

LIO 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

We retain personal data relating to research study participants only for as long as necessary to fulfil the purposes for which it was collected, to meet legal, regulatory and ethical obligations, and to support legitimate research and product development activities.

Retention periods may vary depending on the nature of the study and the type of data collected. Where applicable, retention periods are defined in the relevant study protocol and approved as part of the study governance process.

Our general retention approach is set out below.

- Participant recruitment and administration data is retained for up to 12 months after the conclusion of recruitment for the relevant study, unless the individual has been accepted into the study.
- Screening and suitability assessment data is retained for up to 12 months after medical device clearance is received, unless longer retention is specified in the study protocol or required for audit purposes.
- Personal data collected during participation in a research study, including study data, health information and any video or audio recordings, is retained for the period specified in the study protocol. This may include retention for the lifetime of the relevant product plus an additional period where required by medical device regulations.
- Interview feedback and analysis data are pseudonymised as soon as practicable and retained for analysis and evaluation in accordance with the study protocol.
- Bank account details and payment records are retained only for as long as necessary to process reimbursement or compensation payments and to meet applicable financial, accounting and audit requirements, after which they are securely deleted or anonymised.

In all cases, we apply appropriate safeguards to ensure data is securely stored, accessed only when necessary, and disposed of when no longer required.

## 5. Who your personal data is shared with

Other than being used within LIO by its employees, in addition to sharing pseudonymised data with regulatory bodies and other public authorities as required by law, LIO may share your data with third party contractors supporting with the validation of the research study. Where this happens the details of third parties being used at the time of the study are included in the participant information sheet shared with you at the time consent is given.

In addition LIO 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 LIO 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.

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

## 6. Location of personal data

We may sometimes transfer, store, or host Personal Data with third-party service providers located outside the UK and/or the European Economic Area (EEA), including in countries where data protection laws may offer a lower level of protection than in the UK.

Where such transfers occur, we ensure that they are carried out in accordance with this Privacy Notice and applicable data protection laws. We take steps to ensure that recipients provide adequate levels of protection and security for Personal Data.

The international transfer mechanisms we rely on include:

- The UK–EU adequacy decision (for transfers to EEA countries);
- The EU–US Data Privacy Framework with UK extension (for transfers to certified US organisations);
- Standard Contractual Clauses (SCCs) with the UK Addendum;
- Or, where available, Binding Corporate Rules (BCRs).

Where none of the above mechanisms apply, we will carry out a Transfer Risk Assessment (TRA) to identify appropriate supplementary measures and ensure an equivalent level of protection.

Where third parties process Personal Data on our behalf, we require them to implement appropriate safeguards to protect that 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.

### **Non Discrimination**

LIO 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

LIO 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@liohealth.com](mailto:privacy@liohealth.com), call us at +44-1865-900599, or write to us at:

LIO 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 LIO'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](http://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](mailto:imy@imy.se)  
Website: [www.imy.se](http://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](http://www.ccpa.ca.gov)

## 10. Review and update of privacy notices

LIO 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.