

Occam Research Ltd Privacy Notice Website privacy statement

Last updated 11th June 2026

Introduction

This Privacy Notice (“Notice”) – together with any other privacy information we may provide on specific occasions – applies to the processing of personal data by us when you use our website and our products and services, visit us at our office and carry out our business operations. The Notice sets out the types of personal data we collect, explains how we collect and process that data, and who we share it with, and includes certain rights and options that you have in this respect.

We recognise that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies.

When we refer to “Occam Research Ltd” or “we” in this Notice we mean Occam Research Ltd, a company incorporated in Scotland with registered number SC391179 and registered address at 3 Clairmont Gardens, Glasgow, G3 7LW. Our office address is Unit 13, Suna House, 65 Rivington Street, London, EC2A 3QQ.

How we collect and use (process) personal information

The people about whom we collect and process personal information:

1. Recruitment candidates
2. Clients and Business Contacts
3. Visitors to our Website
4. Visitors to our office
5. For marketing purposes

1. Recruitment Candidates

We collect and process following information during our recruitment process to assess your suitability for the role you have expressed interest in:

- Your name and contact details (email, phone, address)
- Education and professional qualifications
- Work history
- Terms relating to compensation and benefits packages including salary
- Your eligibility to work in the UK which may include your citizenship and/or nationality
- Any sensitive and/or demographic information voluntarily disclosed during the application or recruitment process such as gender, medical or health information and/or your racial or ethnic origin - this information is only used to support our diversity and inclusion efforts and ensure your health and safety during the recruitment process
- Employment reference checks and background verification checks (where applicable) before you are offered a job. Any such checks are undertaken with your consent.

How we receive this information?

This information is received directly from you when you apply for a job with Occam Research Ltd. This information may be available in your resume or CV, cover letters, interview notes, phone conversations with you, any publicly available information e.g. information posted by you on

social media.

Purpose and data retention

All information gathered during the recruitment process is used solely for assessing your skills, qualifications and suitability against our career opportunities and is not shared with any third parties. If you are offered and accept employment with Occam Research Ltd, the information collected during the application and recruitment process will become part of your employment record and will be retained by us in accordance with our Privacy Notice for Employees and Workers. A copy of this notice will be provided to you.

If your application is unsuccessful (or you withdraw from the process or decline our offer), we will retain your information for 6 months from last contact with you. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision or to consider you for other current or future jobs at Occam Research Ltd.

Special Category Data — Recruitment

Some of the information we collect during recruitment, such as health or medical information and diversity data, is classified as special category personal data under UK GDPR. We process this data only where you have given your explicit consent to do so, or where processing is necessary for the purposes of carrying out our obligations in the field of employment law, or to ensure the health and safety of individuals during the recruitment process. You are not required to provide this information and it will not affect the outcome of your application if you choose not to do so.

2. Clients and Business Contacts

We collect personal information about our clients and business contacts to provide health economic modelling and consultancy services.

We hold the following information about customers:

- Contact details: name, business address, business email address, business phone numbers including mobile numbers
- Personal information contained in business communications

Transaction data including details about services you have engaged us for or enquired about. We may receive personal information from our clients about other individuals, e.g. their employees, while providing our services. Any such information provided to us is used solely for providing our services.

3. Visitors to our Website

Website

Like many websites, our website <https://occamresearch.com> uses cookies, including Google Analytics cookies, to obtain an overview of visitor habits and traffic volumes. Cookies are small pieces of information sent to your computer or device and stored on its hard drive to allow our website to recognise you when you visit. We will not set any non-essential cookies, including analytics cookies, without your prior consent. When you first visit our website, a cookie banner will appear giving you the option to accept all cookies, reject non-essential cookies, or manage your preferences. You may change your cookie preferences at any time via the cookie settings link in the footer of our website, or by adjusting your browser settings.

4. Visitors to our office

We will retain information about your visit, for example, date and time of visit and exit.

5. Marketing Data

We hold name and contact details of individuals who have expressed interest in hearing from us about our services or have engaged with us for supply of our services in the past. All direct marketing activities to such individuals shall comply with relevant privacy and regulatory requirements.

How is your personal data collected?

You may voluntarily give us your personal data by entering information via the website, filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:

- Engage us to provide services
- Complete one of our enquiry forms
- Provide us with feedback

What personal information do we receive from other sources?

We obtain certain personal information about you from sources outside of our business which may include other third party companies. The personal information we receive from third party sources is limited to your contact information.

How we use your personal information

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

1. Where there is a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party, for the following purposes:

- for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same, as explained above);
- to correspond or communicate with you;
- to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the management of queries, complaints, or claims; and
- for the establishment and defence of our legal rights.

2. Where there is a LEGAL REQUIREMENT

We will use your personal information to comply with our legal obligations: (i) to assist any regulator or other public authority or criminal investigation body; (ii) to identify you when you contact us; and/or (iii) to verify the accuracy of data we hold about you.

3. Where it is required to complete a CONTRACT

We may use and process your personal information where we have supplied you (or continue to supply you) with any services, or where you are in discussions with us about any new service. We will use this information in connection with the contract for the supply of services when it is needed to carry out that contract with you or for you to enter into it.

4. Where you have given CONSENT

In certain circumstances we may rely on your consent as the legal basis for processing your personal data, for example where we send you marketing communications by email or text message. Where we rely on consent, we will make this clear at the point at which we collect your data. You may withdraw your consent at any time by contacting us using the details at the end of this policy, or by clicking the unsubscribe link in any marketing email. Withdrawal of consent will not affect the lawfulness of any processing carried out prior to withdrawal.

When and how do we share your personal data

We may share your personal data:

- internally with staff members who require your information to carry out their jobs and who have received training in data protection
- with our professional advisors, including our legal advisors, insurers, accountants, auditors or other consultants to the extent they require this information to provide their services to us
- with subcontractors who are asked by us to deliver all or some of the services e.g., cloud service providers, administration services
- with courts, law enforcement authorities, regulators or government officials where it is legally required
- with third parties providing IT support and maintenance services, data storage services, and other financial institutions providing services to us
- as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation
- in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers
- any third parties with whom you require or permit us to correspond.

We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of our services. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

Transfers of personal data outside the UK

There may be occasions where we need to transfer your personal data to countries outside the UK, for example when using cloud software providers to deliver our services. Where we do so, we ensure that any such transfer is subject to appropriate safeguards in accordance with UK GDPR. These safeguards may include transfers to countries approved as adequate by the UK Secretary of State, the use of

International Data Transfer Agreements (IDTAs), or the UK Addendum to EU Standard Contractual Clauses. In all cases we take appropriate steps to ensure that your personal data remains protected to the standard required under UK data protection law.

Automated decision-making

We do not use automated decision-making in relation to your personal data.

Security of your personal information

To help protect the privacy of data and personally identifiable information you provide to us, we maintain physical, technical and administrative safeguards. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Retention Policy

Your personal data is stored on Occam Research Ltd systems and on the servers of the cloud-based and IT service providers we engage. The key retention periods we apply are as follows:

- Recruitment data (unsuccessful candidates): 6 months from last contact
- Client and engagement data: 7 years from the end of the engagement
- Website enquiry data: 12 months from receipt
- Office visitor data: 12 months from the date of visit
- Marketing contact data: until you opt out or we have had no engagement with you for 3 years

We do not retain personal data in an identifiable format for longer than is necessary for the purpose for which it was collected, subject to any legal or regulatory obligation to retain it for a longer period.

Data Subject Rights

You have several rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Accessing your personal information

You have the right to ask for a copy of the information that we hold about you by emailing us (address at the end of this policy). We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

Correcting and updating your personal information

The accuracy of your information is important. If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us using any of the details described at the end of this policy.

Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal information, as set out under 'How we use your personal information', you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

Objecting to our use of your personal information and automated decisions made about you

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as set out under 'How we use your personal information', you may object to us using your personal information for these purposes by emailing us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

Erasing your personal information or restricting its processing

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

Transferring your personal information in a structured data file ("data portability")

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under 'How we use your personal information', you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the [ICO's website](#) for further details.

Contact us

Please direct any queries about this policy or about the way we process your personal information to our Privacy Team using our contact details below. Our email address for data protection queries is occam@occamresearch.com.

Policy Updates

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website with immediate effect. We recommend you regularly check for changes and review this policy whenever you visit our website. If you do not agree with any aspect of the updated policy you must immediately notify us and cease using our services.