

### 1. Introduction.

This Privacy Policy explains how we use any personal information we collect about you in line with UK data protection laws. For the purposes of this Policy, references to "we", "us" and "our" mean Endeavour Medical Ltd.

All your Personal Data shall be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you want to know what Personal Data we collect and hold about you, or to exercise any of your rights as set out below, please email us at hello@endeavourmedical.co.uk.

Endeavour Medical Ltd of 71-75 Shelton Street, Covent Garden, London, UK, WC2H 9JQ is the controller of your Personal Data for the purposes of the GDPR and is a company registered under number 14095776.

Endeavour Medical Ltd is a privately-owned, medical services company providing remote medical training, project consultancy and risk management services. We need to collect, use and disclose information in order to provide our range of business services. We are committed to the protection of personal information, and maintaining organisational and technical procedures to safeguard the privacy and confidentiality of all information provided to us.

By providing personal information to us (either directly or consenting another person to do so on your behalf), you agree that this Policy will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Policy. If you do not agree with any part of this Policy, you must not provide your personal information to us. If you do not provide us with your personal information, or if

you revoke the consent that you have given under this Policy, this may affect our ability to provide our services to you.

## 2. How do we collect personal information?

We will actively collect personal information from you where it is fair, reasonable and practical to do in order to provide you with our products and services. Generally, we will collect this information when we deal with you in person, by email, telephone, letter, when you use our website, and when you connect with us on social media.

a. How we collect your information via forms on our website.

Endeavour Medical owns and operates the website at www.endeavourmedical.co.uk. Our website provides site visitors with information about our services. We have a number of forms embedded into the website which users can choose to fill in which collect information, including personally identifiable information, including but not limited to full name, address, email, and in some cases information which is considered to be personal or sensitive. Examples of these forms are the following:

# i. Newsletter sign ups.

If you are interested in receiving electronic updates, alerts and news about our products and services, you must provide us with an email address and opt in.

#### ii. Contact us.

If interested in specific services, we may also ask for optional information, such as how you found us, to help us provide you with relevant updates. We will use information you provide in Form submissions to generate a Team Member profile for internal use and, if you provide consent, send you relevant marketing material.

## iii. Application and Booking Information.

If you would like to join a course, you must complete an Application Booking Form. In completing this form, you will be asked for personal and sensitive information to enable us make an assessment and medical screening on your fitness to travel. To travel with Endeavour Medical, you must complete an Application Booking Form, to allow us to provide our services to you in line with our Terms and Conditions.

#### iv. Feedback Information.

This site provides an email address that permits you to send us your own comments, and any other information you choose to include. If you have made a booking with us, we may request comments and feedback information relevant to you via a feedback form or email to improve our products and services, and serve you better as an individual in the future.

b. How we collect your information from third parties.

We work with a number of partners who advertise our products and services, and in some circumstances, we may collect personal information to assist with your booking arrangements. This includes travel applications and bookings made by another person on your behalf, this could be a friend or family member travelling in your group, or an employer. When you make a travel arrangement on behalf of another person, you agree you have obtained their consent for Endeavour Medical to collect, use and disclose information in accordance with this Policy. By providing personal information to us directly or indirectly through third parties to make travel arrangements of your behalf, you are consenting to the collection, use and disclosure of information in accordance with this Policy. If you believe your information has been provided to us without your consent, please refer to the Contact Information/Complaints sections below.

#### 3. What information do we collect?

The type of personal information we collect about you is the essential information we need to arrange, manage and book your course, and deliver the services we are contracted to provide you with upon booking. Our offering requires personal information which may be considered to be sensitive by UK data protections laws, in order to manage the risk of operating in remote parts of the world and assist us in the event of an emergency; medical or otherwise.

#### a. Personal Information.

Generally, the type of personal information we collect about you is the information needed to facilitate your booking. For example, we may collect details such as your name, address, telephone number, email address, passport details, emergency contact and other details relevant to your arrangements with us. When you make contact with us for other purposes,

we may also collect personal information about you in relation to those purposes, such as responding to feedback.

#### b. Sensitive Information.

In some circumstances, we may ask you for personal information that is considered sensitive under UK data protection law. Sensitive data may include your nationality, fitness routine, dietary or physical and mental health. For example, when you apply to a Endeavour Medical course via an application form, you will provide a health declaration on current medications, allergies and past medical, surgical and psychiatric history in accordance with our Terms and Conditions. This essential information will allow us to complete a detailed medical risk assessment and prepare for any medical condition that may require additional medical support or resources and/or affect someone's ability to complete an expedition safely.

# 4. How do we use and disclose your personal information?

From the point of contact inquiry right through to your travel booking and departure, our primary purpose is to collect the information necessary to provide you with advice on our company, our products and our services and/or assist you with the booking. However, this purpose could differ in certain circumstances (ie, the collection of personal information for your participation in consumer research, a competition or customer feedback).

By continuing to use our services and/or by providing us with personal information (or allowing another person to do so on your behalf), you consent to us using and disclosing your personal information for the purpose for which it was collected, and, where permitted by your local data protection laws, for any related secondary purpose which we believe you would reasonably expect. The purposes for which we collect personal information, and those secondary purposes which we consider to be directly related, may include:

Creating and maintaining our relationship with you by creating a team member profile, to document your booking history with us, as well as interests and preferences, in order to supply you with relevant information, advice and support related to our products and services;

- a. Involving you in market research to gauge customer satisfaction and feedback;
- b. Make travel arrangements on your behalf, including visas, permits, vehicle transfers and accommodation bookings;
- c. Complete medical screenings to make a detailed risk assessment of your

### fitness to travel:

- d. Create annotated nominal role documents to be passed on to the appointed course leader to prepare for any associated risks on deployment;
- e. To produce a course debrief report to gauge success and individual behaviour and medical to protect us against legal ramifications of any incidents that could arise from travel to remote areas including but not limited to; altitude, illness, disease, natural disasters, terrorism, civil unrest, war and accidents;
- f. Research and analysis (eg. mapping trends and preferences to develop and improve our products and services)
- g. Internal accounting and administration;
- h. Regulatory reporting and compliance;
- i. Identification of fraud or error;
- j. Other purposes as authorised or required by law (ie, health and safety, to prevent threat to life, to enforce our legal rights).

# Promotional marketing.

We may occasionally use your personal information to send you targeted marketing and promotional activities to promote products and service we believe may be of interest you. UK data protection law may require you to opt-in to receive this information. These marketing activities could include, but are not limited to:

- i. Electronic marketing (including, e-newsletters, email, SMS, MMS and iM)
- ii. Direct marketing (leaflets, brochures and letters)
- iii. Telephone calls

If you wish to no longer receive an marketing/promotional material from us by electronic marketing you can request to not receive this information at any time, by following the unsubscribe prompts. To opt-out of market research and other forms of communication, please refer the contact section below.

Endeavour Medical will never sell or share your personal information or data to other companies for marketing purposes. If you participate in partnership marketing activities with Endeavour Medical and another company, you will be provided with the choice of receiving news from all companies involved.

#### Promotional Material.

Endeavour Medical reserve the right to use any photographs and images taken on a trip or trip related occasion by its employees, or forwarded by any

persons on the trip or connected to the trip, in its brochure, on its website, in its social network marketing activities or for use in any other relevant promotional material.

# 5. Who will have access to your information?

Endeavour Medical is committed to the purpose limitation, integrity and confidentiality of your personal information. Your information will be used only by authorised persons where it is relevant to do so and limited to the necessary information required for that particular purpose alone. For example, your personal identification information may be shared to obtain permits for your destination from regulatory bodies, but as medical declaration is not essential information it would not be shared in this instance.

The persons who will where necessary have access to your information may include but are not limited to:

# a. Endeavour Medical Employees.

Internal staff fulfil the role of Data Controllers. Data Controllers exercise organisational measures to manage purpose limitation, authorising the use of personal information for specified, explicit and legitimate purposes as described in this Policy.

#### b. Medical Advisors.

In the circumstances where an individual's medical declaration, submitted via our Application Booking Form, requires further assessment from a qualified medical professional, Endeavour Medical employees will pass on the declaration to our Medical Advisor. The Medical Advisor will use this information plus any other relevant information we hold, to assess physical and mental health, provide medical risk mitigation advice, suggest medical equipment or supplies and advise our risk management procedure. This may include further email and phone discussions.

c. Contracted Expedition Leaders, Guides or Consultants.
In order to enact Endeavour Medical's Risk Management Policy, it is necessary to provide certain sensitive and/or personal data to our contracted expedition leaders, guides or consultants. As contracted by Endeavour Medical, these persons will abide to the terms of use described in this Policy.

#### d. Travel Service Providers.

To fulfil your travel booking and arrangements, we may share your information where necessary with travel service providers, including but not limited to accommodation, transfers, flight and tour providers.

## e. Consulates/Embassies.

In the event Endeavour Medical is required to arrange travel visas for your travel booking, we may share your personal information with the relevant embassy and/or consulate.

# f. Government organisations such as National Parks.

In the circumstances where your travel arrangements include travel to a restricted area or region, we will be required to share necessary personal information with those particular government organisations to obtain the individual permits needed to access the region/area.

# 6. Is your information transferred overseas?

In some circumstances your information will be shared with Endeavour Medical's partners or relevant organisations overseas. Only information deemed necessary by Endeavour Medical will be provided and only for specific uses as detailed above. When booking a trip with Endeavour Medical, you must be aware of and accept that information infrastructures and data policies in many destinations will not be equivalent to the UK or Europe.

## 7. How do we store your information?

Information submitted to Endeavour Medical verbally, by email or other electronic communication or through form submissions on our website will be stored in a number of digital locations. Access to these are limited to approved Endeavour Medical staff, protected by encryption and monitored routinely for attempted breaches or incursions. Digital copies of information and communications are held by Endeavour Medical for a period of 10 years from the last update to ensure access and compliance in the event of any legal proceedings. Where paper copies of pertinent data are required, for example for reference on expedition where digital access is not available, these copies are entrusted to approved Endeavour Medical personnel and destroyed when no longer of use. Where Endeavour Medical's website is used to make payments, this information is not stored by Endeavour Medical and cannot be accessed by Endeavour Medical staff.

## 8. Security of Information.

Endeavour Medical take the protection of your personal and sensitive information very seriously and actively monitor their information systems for signs of misuse. Information held by Endeavour Medical will only be accessed by approved, relevant members of staff and third parties as described above, and where possible, data which is shared will first be anonymised or removed from context. Endeavour Medical undertake to inform all customers of any potential data breaches, or suspected unauthorised access to this data, in a timely manner. Endeavour Medical operate a secure website certified independently and informations submitted through website forms are encrypted.

# 9. Access, amendment and removal of personal information.

If you suspect any information on you is being held without your consent or was provided to Endeavour Medical by a third party, please contact Endeavour Medical. At any time, you may request access to your personal information as held by Endeavour Medical, subject to any legal restrictions or proof of identity, and you may also request amendments insofar as these do not restrict the ability of Endeavour Medical to complete our contract with you. Where amendments and/or removal of personal information is requested, you will accept that this may impede Endeavour Medical's ability to deliver the contracted service and may result in a termination of that contract. If you require any reasonable adjustments to be made to either this policy, or to the accessed format of your data as held by Endeavour Medical, the company will endeavor to provide this, for example in large text, in a format which can easily be translated etc.

## 10. Cookies.

This site uses cookies, which are small text files that store non-personally identifiable information about you, either temporarily in connection with your Internet Protocol (IP) address (known as a temporary or session cookie, and deleted once you close your browser window) or more permanently on the hard drive of your computer (known as a permanent or persistent cookie). This Site uses session cookies so that you do not have to fill in the same information from page to page within

www.endeavourmedical.co.uk. If you elect not to receive cookies, you may be able to view some, but not all, of the content on this Site.

### 11. IP Addresses.

This site uses Internet protocol (IP) addresses. IP addresses are unique identifiers automatically assigned to each computer when logging onto the Internet. IP addresses allow us to collect much of the same information we collect through cookies, including browser type, what pages you visit, and how long you stay on the site. In general, IP addresses allow us to identify problems with our servers, prepare aggregate demographic information and other information regarding this use of this site, and improve the functions of this site.

#### 12. Contact Information.

Endeavour Medical Ltd are at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ. Please contact us by email at hello@endeavourmedical.co.uk.

# 13. Changes to this Policy.

From time to time we will update this policy. If we make any changes to this Policy, they will be published on on our website at: <a href="https://www.endeavourmedical.co.uk/privacy/">https://www.endeavourmedical.co.uk/privacy/</a> You must take responsibility, and we encourage you to, check this Policy for any updates.

Last updated 01 January 2023.