GDPR and Privacy Notice

Last updated: November 2026

Introduction

At Lombard Medical we are committed to protecting your privacy. We will use your personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA), the Privacy and Electronic Communications Regulations 2003 (PECR) and other applicable laws and regulations that relate to data protection and privacy, in each case as amended from time to time (including by the Data (Use and Access) Act 2025).

The privacy of our customers is of paramount importance and we will always treat your personal information as confidential. If you have any questions or concerns relating to this privacy notice, please do not hesitate to contact Customer Services or our data protection team (details in the “How you can contact us” section below) and one of our representatives will be happy to help.

In the course of our dealings with you, we will collect and process personal information about you in order to provide you with the goods and services you request and to administer our relationship with you. This may involve the sharing of your personal information with other third parties.

Who are we?

In this Privacy Notice, references to we, us or our (or words of similar import) means Lombard Medical Ltd. Registered Office: Lombard Medical House, 4 Trident Park, Didcot OX11 7HJ.

We are registered with the Information Commissioner’s Office (ICO) under registration number **Z9435931**.

For the purposes of this notice we are the data controller in respect of your personal information that we collect and process as further described in this Privacy Notice.

As described below, we may share your personal information with other organisations that may receive and process your personal information as a data controller in their own right. We also use service providers who process personal information on our behalf and only on our instructions (known as data processors).

The data we process and store:

This section provides you with information about:

- what personal data we hold and process;
- in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- the purposes for which we may process your personal data;

- the legal grounds on which we process your data; and
- who we share it with, whether it leaves the UK, and how long we keep it.

Order Processing

When you place an order(s) for goods or services via phone or email we collect personal information which may include; your contact details (including email address and mobile phone number), delivery address and any transaction details. We also collect data about your purchase history, and information generated from our own analysis of this information.

When placing an order through our systems for a patient, **please remove any personal details** and do not include patient names, dates of birth, NHS numbers or health information. We do not need this information to fulfil your order. We understand that some of our customers may wish to use a name for a reference; where possible please use a non-identifying reference instead. If you do use a name, we will always protect this data as per this notice.

How we use this data:

We process your personal data based on performing a contract (or taking steps at your request before entering into one). This personal data may be processed for the purposes of administering payment, to allow us to deliver the services/goods you have ordered and in keeping proper and accurate records of these transactions. We also process some of this data to meet our legal obligations (for example, accounting and tax record-keeping) and on the basis of our legitimate interests in assessing credit risk and preventing fraud.

We hold your data in our own database, which is UK hosted.

We will share some of your personal data with selected third parties in order to provide you with the goods and services you request and to administer our relationship with you. This will include couriers to deliver parcels on our behalf, our email platform provider, credit reference agencies and third parties who operate data storage/management systems on our behalf. Full details of such third parties can be provided on request (using the contact details in the “How you can contact us” section below).

Events

From time to time we may process data to allow you to attend international events.

How we use this data:

We may use your contact details, passport information and any other appropriate documentation to allow us to process your travel information and arrange your attendance. We process this data because it is necessary for us to arrange the travel and attendance you have asked us to arrange, and on the basis of our legitimate interests in organising and running our events.

We hold your data in our own database, which is UK hosted. Data will only be held for as long as is required for the purpose it is collected.

We also process your contact details on the basis of our legitimate interests in keeping in contact with our current and previous customers to keep them informed of our news, offers and events. You can ask us to stop at any time.

We will share some of your personal data with selected third parties. This will include our travel agency partner and, through them, the airlines, hotels, event organisers and other providers needed to make your arrangements. Where you are attending an event outside the UK and EEA, this will involve your travel details being sent to those providers abroad; see “International Transfers” below. Full details of such third parties can be provided on request (using the contact details in the “How you can contact us” section below).

Social Media

You may come across us on social media through your own networks. We do this to inform, educate and engage new and existing customers.

If you contact us via these channels, please be aware that we have no control over the data provided while on the platform, and that the platform provider will handle your data under its own privacy notice. Your enquiry data may be transferred to our database as detailed in the Enquiries section.

Customer Services

If you lodge a complaint with us, we will record details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. This information will be stored in our database.

We will only use the complaint data to process the complaint and to check on the level of service we provide or how contracts are performed. We may compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

If you make a warranty claim with us, we will record your personal details and details of the fault. This information may be shared with the manufacturer to process the warranty claim. Where we are legally required to report a product safety issue to a manufacturer or regulator, we may also share the relevant information with them.

We process your personal data in this way on the basis of our legitimate interests in dealing appropriately with the complaint or claim, and, where we are required to report a safety issue, to comply with our legal obligations.

This section is about complaints concerning our products and services. For complaints about how we handle your personal data, see “How to make a data protection complaint” below.

Enquiries

If you get in touch with us via the contact form on the website, via phone, email or face to face at an event we may save the details you provide us in our database. This way, if you get in touch with us in future, we can refer to our previous conversations. The enquiry data

may be processed for the purposes of responding to your enquiry and, where you have agreed to hear from us, offering relevant products and/or services to you.

The legal basis for this processing is our legitimate interests in responding to your enquiry appropriately. We will not contact you for marketing purposes or share your details without asking for your consent.

Job Applications

While making an application for a vacancy that we are advertising we will ask you to either send your CV to us or complete an application form. These will include a variety of your data including your contact details, employment history and other information. You may also provide us with special category data, such as information about health conditions or disability (for example, so that we can make reasonable adjustments), and information about criminal convictions. Please only provide this where it is relevant or we ask for it.

How we use this data:

We use the information to process your application for employment with Lombard Medical. We process your personal data on the basis of taking steps at your request to enter into a contract and our legitimate interests in recruiting suitable staff. Where we process health or criminal conviction data, we do so only where permitted by law, for example to meet our obligations in connection with employment and to make reasonable adjustments.

We will only use your data for processing your application. If your application is unsuccessful your data will be retained for a period of 12 months, or if requested by you, your data will be held on record for future vacancies. If you are successful, your information will be handled in line with the privacy information we provide to employees.

Your data will not be shared without your consent, other than with service providers who host or support our recruitment systems on our behalf, or where we are required to do so by law.

Correspondence

We may process information contained in or relating to any communication that you send to us.

The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website and any contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

Business Contacts

We have a wide variety of business contacts. You or your employer may provide us with your data, or we may obtain your data from the public domain (for example, your

organisation's website or professional networking sites) to allow us to contact you in relation to the services we offer. If we obtain your data from a source other than you, we will tell you where it came from when we first contact you.

How we use this data:
We will use your business contact details to contact you and keep you informed of news, industry updates, invitations to events, performance of our services and support.

We process your personal data on the legal basis of legitimate interest, namely the proper administration of our services and communications with users. We will only use your data for the purpose it has been given to us and you can opt-out at any time.

We hold your data in our own database, which is UK hosted.

We will share some of your personal data with selected third parties. This will include our email platform provider and third parties who operate data storage/management systems on our behalf. Full details of such third parties can be provided on request (using the contact details in the "How you can contact us" section below).

Other Processing and Data Sharing

We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject (including requests from regulators, law enforcement or the courts), or in order to protect your vital interests or the vital interests of another natural person.

Details of 3rd Parties:

The third parties we work with include, depending on how you deal with us:

- couriers and delivery partners;
- our email platform provider;
- credit reference agencies;
- providers of data storage and management systems;

- our travel agency partner;
- manufacturers (for warranty claims);
- our professional advisers and insurers.

Full details of the third parties we work with can be provided on request using the contact details in the “How you can contact us” section below.

Opt-Out of Communications

We do not send unsolicited marketing emails. Where we do contact you with news, updates or invitations, or you have asked to hear from us, you may opt-out of receiving any communications at any time by contacting us using the details below or using the unsubscribe link in any email we send. Please note where we are required by law or regulation to contact you, we will do so. This includes important service, safety or regulatory notices, which are not marketing.

International Transfers:

We do not routinely transfer your data outside the United Kingdom or the European Economic Area (EEA). Our database is UK hosted. The main exception is where you attend an international event and we need to share your travel details with providers in the country you are travelling to (see “Events” above).

Where your personal data is transferred outside the UK and EEA, we will ensure that either (a) the transfer is to a country or organisation covered by UK adequacy regulations (including, where applicable, the UK Extension to the EU–US Data Privacy Framework), or (b) we have put in place appropriate safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, so that your data is protected to a standard that is not materially lower than under UK law. Where neither applies, we will only transfer your data where the law permits, for example where it is necessary to carry out arrangements you have asked us to make for you. You can ask us for more information about the safeguards we use.

How we use cookies

A cookie is a small file that is placed on your computer or device when you visit a website. Cookies help the website work, can analyse web traffic and let us know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use cookies to:

- Allow you to remain logged in to your account when browsing our store.
- Remember your preferences when using the store.
- Use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer

needs, such as remembering the last product you viewed. We only use this information for statistical analysis purposes and then the data is deleted or anonymised.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Cookies that are strictly necessary for the website to work (such as those that keep you logged in) do not need your consent. For other cookies, we will ask for your consent before they are set, unless the law allows us to use them without it because they present a low risk to your privacy (for example, certain analytics cookies used only to improve our website, or cookies that remember your preferences). Where we rely on that exemption, we will give you clear information and a simple way to object.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

The legal basis for this processing is your consent where consent is required and otherwise our legitimate interests, namely the improvement of our site.

Keeping your data secure

We use appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration or disclosure, including limiting access to those who need it and requiring our service providers to protect it. If a personal data breach is likely to result in a risk to your rights and freedoms, we will report it to the ICO within 72 hours of becoming aware of it, and where the risk is high we will also tell you without undue delay.

Children

Our website and services are intended for business and healthcare customers and are not directed at children. We do not knowingly collect personal data from anyone under 18.

Automated decision-making

We do not make decisions about you based solely on automated processing, including profiling, which have a legal or similarly significant effect on you. If this changes, we will update this notice and make sure you have the safeguards the law requires, including the right to have a person review the decision, to give us your view and to challenge it.

Retaining and deleting personal data:

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. For example, if your job application is unsuccessful we will keep it for 12 months (unless you ask us to keep it for future

vacancies), and we keep order and transaction records for as long as the law requires us to for accounting and tax purposes (typically six years). Once we no longer need your data, we will delete it or anonymise it.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, for the establishment, exercise or defence of legal claims, or in order to protect your vital interests or the vital interests of another natural person.

Your rights:

Under the UK GDPR and the DPA you have the following rights in respect of the personal data we hold about you:

- the right to be informed about how we use your data (this notice);
- the right of access to your data;
- the right to have inaccurate or incomplete personal data rectified;
- the right to have your data erased in certain circumstances;
- the right to restrict our processing of your data in certain circumstances;
- the right to data portability;
- the right to object to processing, including a right to object to processing for direct marketing;
- rights relating to automated decision-making and profiling;
- the right to withdraw your consent at any time where we rely on it; and
- the right to complain to us and to the ICO.

You may also have the right to claim compensation for damage caused by a breach of data protection law. If you wish to exercise any of these rights, please contact us using the details set out below.

How we respond. We will respond to your request without undue delay and within one month of receiving it. We may extend this by up to two further months where your request is complex or you have made a number of requests, and we will tell you if so. If we need to confirm your identity or ask you to clarify your request, the time limit starts once we have the information we need. We will carry out reasonable and proportionate searches for your data. We do not normally charge a fee, but we may charge a reasonable fee or refuse to act where a request is manifestly unfounded or excessive, and we will explain why if we do.

Your right to access your data. You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold, the recipients of that personal data, how long we will keep it and where we got it from. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.

Your right to rectification. If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the

processing, you also have the right to have any incomplete personal data about you completed.

Your right to erasure. In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; you object to the processing and there are no overriding legitimate grounds; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. We will analyse each request for erasure and we will agree if there is no legitimate reason to retain the data to the normal retention period, at which point we will instruct anonymisation or deletion of the data.

Your right to restrict processing. In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

Your right to object to processing. You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

Your right to object to direct marketing. You can object to us processing your personal data for direct marketing purposes at any time. If you make an objection, we will stop processing your personal data for this purpose.

Your rights relating to automated decisions. You have the right not to be subject to a decision based solely on automated processing, including profiling, that has a legal or similarly significant effect on you, except in limited circumstances where the law allows it and safeguards apply (see “Automated decision-making” above).

Your right to data portability. Where we process your personal data based on your consent or to perform a contract with you, and the processing is carried out by automated means, you have a legal right to receive a copy of the personal data you have provided to us. We will not be accepting Data Portability files from other third-party companies/individuals. When a data request is made of us we will make available all applicable personal data to you in a .CSV file or alternative machine-readable format agreed by us, to be passed to the appropriate third party on your instruction. We will not however

process your data in this way if we believe that it may pose a threat to the security of the data.

Your right to object for statistical purposes. You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

Right to withdraw consent. To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

Exercising your rights. You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above. You do not have to use a particular form or wording.

How to make a data protection complaint

If you are unhappy with how we have handled your personal data, please contact us first using the details below. You can do this by email, phone or post. We will acknowledge your complaint within 30 days of receiving it, look into it without undue delay and keep you informed of progress and the outcome.

If you are not satisfied with our response, or you think that our processing of your personal data infringes data protection laws, you have the right to lodge a complaint with the Information Commissioner's Office (the ICO, now the Information Commission's Office) via https://ico.org.uk/concerns/. If you live or work in the EU, you may also complain to the supervisory authority in your EU member state of habitual residence, place of work or place of the alleged infringement.

How you can contact us:

If you wish to exercise any of these rights, make a complaint, or you have any questions regarding this notice, our data protection team can be contacted via:

Email: dataprotection@lombardmedical.com
Phone: 01235 750800
Post: Lombard Medical Ltd, Lombard Medical House, 4 Trident Park, Didcot OX11 7HJ

Amendments:

We may update this notice from time to time by publishing a new version on our website, and we will update the "last updated" date at the top. Where we make significant changes we will take reasonable steps to bring them to your attention.

You should check this page occasionally to ensure you are happy with any changes to this notice.