



YOUR PRIVACY AND COVID-19

In an effort to keep our BGSA community safe in light of the COVID-19 pandemic, we are collecting additional information from our clients, employees, guests and other visitors. Our transparency is key to maintaining your trust, and during these unprecedented times, we are especially mindful of striking the right balance between ensuring the health and safety of our clients, employees and the public while respecting your privacy. Accordingly, effective as of July 16, 2020, the following privacy notice (the “**Privacy Notice**”) shall apply in addition to our existing [Privacy Policy](#), set forth on our website, which will continue to otherwise govern our collection, use and other processing of your information. As the current circumstances and the needs of our community evolve, this Privacy Notice may be modified or updated at BGSA’s sole discretion. If we make any changes to our Privacy Notice, we will post the revised document in the [Privacy Policy](#) section of our website and such changes will be effective immediately upon that posting.

What Information We’re Collecting: We may collect certain information about your potential exposure to COVID-19 and health through periodic health declarations or questionnaires we ask you to complete. We may also collect measurements of your body temperature before or during any of our courses or events. We may record or store your body temperature measurement and, if your body temperature registers higher than our permitted threshold for course participation, we reserve the right to record and indicate in our system that you were denied participation. In addition we may collect information provided by you, or a public health authority or other government agency, if you test positive for COVID-19, including information about how you interacted with BGSA during the time in which you may have been infected with COVID-19. All of the foregoing is referred to in this Privacy Notice as “**Screening Information**”.



What We're Doing with Screening Information: We collect and use Screening Information to help provide a safe environment for our employees and clients, for public interest in protecting public health. We will use Screening Information in furtherance of those legitimate interests and business purposes. We will not use your Screening Information for any marketing or promotional purposes.

How We May Share Screening Information: While we generally will not share your Screening Information without your consent, we reserve the right to disclose this information, and other related information such as contact information, to government and regulatory authorities and other health authorities in your jurisdiction, or as otherwise necessary or appropriate in furtherance of public health or safety. If you are a client in the United Kingdom, please see below for additional information regarding NHS Test and Trace. If we are notified that you tested positive for COVID-19 within 14 days after your last participation in one of our courses or events, or if we otherwise determine that you may pose a risk to our community, we reserve the right to disclose to our employees and members that an individual who tested positive, or otherwise poses a risk to our community, participated in a specific course and while we will not disclose your name unless legally required to do so, we may disclose information such as the date and time of your course, your gender, and areas and amenities you used. We share this information to help ensure our courses and events remain safe for our employees and other clients. We may also share your Screening Information and other related information with service providers, advisors or consultants who are performing services on our behalf and for other reasons in accordance with applicable law, as further described in the [Privacy Policy](#) section of our website. Please note we may disclose aggregated, de-identified information for any other lawful purpose.

NHS Test and Trace: If you are a participant of, or other guest or other visitor at, one of our courses or events in the United Kingdom, please note, we may share information that we already collect about you, pursuant to our Privacy Policy found



on our website, such as your name, contact phone number, date of course participation, arrival time and estimated departure time ("Visit Information"), with NHS Test and Trace for purposes of supporting their contact tracing service and complying with their requests. By booking and participating in one of our courses or events in the United Kingdom, you are consenting to the sharing of your Visit Information for such purpose. You may, however, choose to opt-out of sharing your Visit Information with NHS Test and Trace by contacting enquiries@beargryllssurvivalacademy.com with the subject line "NHS Test and Trace Opt-Out."

How We Retain Screening Information: Your Screening Information will be protected as described in our [Privacy Policy](#) section of our website, and will be retained only as long as we determine reasonably necessary to ensure the health and safety for our clients, employees, guests and in accordance with applicable law. As noted above, your body temperature measurement may be stored if required by applicable law, and we will retain your *BGSA COVID-19 Acknowledgements of Risk and Health Agreement* form, as well as any records (if any) that you were denied participation in one of our courses or events. Any information that we retain will be stored for a reasonable period of time, including as we determine necessary to comply with applicable law or to establish or defend our legal rights.

Your Options: At this time, BGSA requires you to provide Screening Information as a condition for participating in any of our courses or events. However, if you are uncomfortable with providing any requested Screening Information or do not wish to consent to this Privacy Notice, we are happy to issue you a voucher credit in the amount paid for the course during the period in which Screening Information is required. Please contact enquiries@beargryllssurvivalacademy.com if you have any questions regarding our screening procedures or would like to receive a voucher in lieu of participation in your scheduled course.