DATA PROTECTION POLICY

This is the Data Protection Policy of
Envista Branding Ltd

Also containing the Information Security Policy, the Retention of Data and Records Policy and Data Breach Policy

Review date: 25th May 2021
or earlier in light of relevant legislative changes

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DATA PROTECTION POLICY

Data Protection Legislation:

means the Data Protection Act 1998, the Privacy and Electronic Communications Regulations (EC Directive) Regulations 2003 (SI 2426/2003 as amended), and all applicable laws and regulations, including any replacement UK or EU data protection legislation relating to the Processing of Personal Data, including, where applicable, the guidance and codes of practice issued by the Information Commissioner's Office.

The Data Protection Legislation ("the Legislation") is concerned with the protection of human rights in relation to personal data. The aim of the Legislation is to ensure that personal data is used fairly and lawfully and that where necessary the privacy of individuals is respected. This policy sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

The Data Protection Manager for Envista Branding Ltd ("Envista") is responsible for ensuring compliance with the Legislation and with this policy. The post is held by Jon Aske (jon@envista.co.uk).

Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Manager.

Processing personal data

All personal data should be processed in accordance with the Legislation and this policy. Any breach of this policy may result in disciplinary action.

Processing includes obtaining, holding, maintaining, storing, erasing, blocking and destroying data.

Personal data is data relating to a living individual. It includes employee data. It will not include data relating to a company or organisation, although any data relating to individuals within companies or organisations may be covered. Personal data can be factual (for example a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

Examples of personal data are employee details, including employment records, names and addresses and other information relating to individuals, including supplier details, any third party data and any recorded information including any recorded telephone conversations, emails or CCTV images.

Employees and others who process data on behalf of Envista should assume that whatever they do with personal data will be considered to constitute processing. Individuals should only process data:

- If it is in the legitimate business interests of Envista to do so; or
- If they have consent to do so; or
- If it is necessary to fulfil a contractual obligation or as part of the employer/employee relationship; for example, processing the payroll
- If none of these conditions are satisfied, individuals should contact the Data Protection Manager before processing personal data.

Compliance with the Legislation

Employees and others who process data on our behalf have a responsibility for processing personal data in accordance with the Legislation. Anyone who has responsibility for processing personal data must ensure that they comply with the data protection principles in the Legislation. These state that personal data must:

- be obtained and used fairly and lawfully
- be obtained for specified lawful purposes and used only for those purposes
- be adequate, relevant and not excessive for those purposes
- be accurate and kept up to date
- not be kept for any longer than required for those purposes
- be used in a way which complies with the individual's rights (this includes rights to prevent the use of personal data which will cause them damage or distress, to prevent use of personal data for direct marketing, and to have inaccurate information deleted or corrected)
- be protected by appropriate technical or organisational measures against unauthorised access, processing or accidental loss or destruction
- not be transferred outside the European Economic Area without a data processing agreement from the company or where the country is determined to have adequate systems in place to protect personal data.

Monitoring the use of personal data

We are committed to ensuring that this data protection policy is put into practice and that appropriate working practices are being followed. To this end the following steps will be taken:

- Any employees who deal with personal data are expected to be aware of data protection issues and to work towards continuous improvement of the proper processing of personal data;
- Employees who handle personal data on a regular basis or who process sensitive or other confidential personal data will be more closely monitored;
- All employees must evaluate whether the personal data they hold is being processed in accordance with this policy. Particular regard should be had to ensure inaccurate, excessive or out of date data is disposed of in accordance with this policy;
- A Data Protection Impact Analysis ("DPIA") should be carried out before any new activity which would collect personal information.
- Spot checks may be carried out;
- An annual report on the level of compliance with or variance from good data protection practices will be produced by the Data Protection Manager. Data breaches will be recorded and investigated to see what improvements can be made to prevent recurrences.

Handling personal data and data security

We will take appropriate technical and organisational steps to guard against unauthorised or unlawful processing. Manual records relating to individual persons will be kept secure in locked cabinets. Access to such records will be restricted. Computer files should be password protected (or require a login to access them).

We will ensure that staff and members who handle personal data are adequately trained and monitored. All staff are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

We will ensure that passwords and physical security measures are in place to guard against unauthorised disclosure. Where possible this will always include the use of multi-factor authentication methods.

We will take particular care of sensitive data and security measures will reflect the importance of keeping sensitive data secure (definition of sensitive data is set out below).

Security policies and procedures will be regularly monitored and reviewed to ensure data is being kept secure.

Envista will only record, store and process personal data that is required for the purposes to which it was obtained. Any secondary purposes, e.g. for direct marketing, will be clarified on the sign up mechanism.

The data we hold on any individual will be kept in as few places as necessary, and staff will be discouraged from establishing unnecessary additional data sets.

We will endeavour to keep the personal information we store about individuals accurate.

Forms for collecting personal information (e.g. employment application forms, online order forms, event registration forms) will be undergo a DPIA and be reviewed by the Data Protection Manager to ensure that the information requested from individuals is adequate, relevant and not excessive for its purpose.

Where personal data needs to be deleted or destroyed adequate measures will be taken to ensure data is properly and securely disposed of. This will include destruction of files and backup files and physical destruction of manual files. Particular care should be taken over the destruction of manual sensitive data (written records) including shredding or disposing via specialist contractors.

All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed. Any agent employed to process data on our behalf will be bound to comply with this data protection policy by a written contract.

The rights of individuals (including Subject Access Requests)

The Legislation gives individuals certain rights:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision making including profiling

All requests from persons relating to any of these rights should be passed on to the Data Protection Compliance Manager without delay

Right To Be Informed
Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR.
We must provide individuals with information including: our purposes for processing their personal data, our retention periods for that personal data, and who it will be shared with. We call this 'privacy information'.
We must provide privacy information to individuals at the time we collect their personal data from them.

Right Of Access (Subject Access Requests)
Individuals have the right to access their personal data and supplementary information.
The right of access allows individuals to be aware of and verify the lawfulness of the processing.
Any request for access to data under the Legislation should be made to The Data Protection Compliance Officer in writing. In accordance with the Legislation we will ensure that written requests for access to personal data are complied with within 30 days of receipt of a valid request. There is no charge for subject access requests.
All workers are required to pass on anything which might be a subject access request to the Data Protection Compliance Manager without delay.
When a written data subject access request is received the data subject will be given a description of a) the personal data, b) the purposes for which it is being processed, c) those people and organisations to whom the data may be disclosed, d) be provided with a copy of the information in an intelligible form.
Only data relating to the data subject will be provided and that any data belonging to third party data subjects will be redacted from the copy provided under the Subject Access request.

Right To Rectification
The GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.
An individual can make a request for rectification verbally or in writing.
We have one calendar month to respond to a request.
If we receive a request for rectification we should take reasonable steps to satisfy ourselves that the data is accurate and to rectify the data if necessary.

Right To Erasure (Right To Be Forgotten)
Individuals have the right to have their personal data erased if:
the personal data is no longer necessary for the purpose which we originally collected or processed it for;
we are relying on consent as our lawful basis for holding the data, and the individual withdraws their consent;
we are relying on legitimate interests as our basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing;
we are processing the personal data for direct marketing purposes and the individual objects to that processing;
we have processed the personal data unlawfully (ie in breach of the lawfulness requirement of the 1st principle);
we have to do it to comply with a legal obligation; or
we have processed the personal data to offer information society services to a child.

Right To Restrict Processing
The GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way that an organisation uses their data. This is an alternative to requesting the erasure of their data.

Individuals have the right to restrict the processing of their personal data where they have a particular reason for wanting the restriction. This may be because they have issues with the content of the information we hold or how we have processed their data. In most cases we will not be required to restrict an individual's personal data indefinitely, but will need to have the restriction in place for a certain period of time.

Right To Data Portability
The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

Right To Object
Individuals have the right to object to:
processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
direct marketing (including profiling); and
processing for purposes of scientific/historical research and statistics.

Sensitive data

We will strive to ensure that sensitive data is accurately identified on collection so that proper safeguards can be put in place. Sensitive data means data consisting of information relating to an individual's

- Racial or ethnic origin
- Political opinions
- Religious beliefs
- Trade union membership
- Physical or mental health
- Sexual life
- Criminal offences

In circumstances, where other forms of sensitive personal data is to be held or processed, Envista will seek the explicit consent of the subject unless one of the limited exemptions provided in the legislation applies such as:

- To perform a legal duty regarding employees or
- To protect the data subject's or a third party's vital interests.

Sickness records are likely to include sensitive data and as such should only be held if the explicit consent of each employee is obtained or if one of the other conditions for processing sensitive data is satisfied.

Changes to this policy

We reserve the right to change this policy at any time. Where appropriate we will notify data subjects of those changes by mail or email.

Signed: Date:

Name: Position:

Review Date: 25th May 2021 unless key changes in legislation require earlier review

INFORMATION SECURITY POLICY

Envista is committed to maintaining a secure information environment and applies appropriate technical and organisational measures to maintain information security. Information security involves preserving confidentiality, preventing unauthorised access and disclosure, maintaining the integrity of information, safeguarding accuracy and ensuring access to information when required by authorised users.

In addition to complying with this policy, all users must comply with the Data Protection Legislation and the Data Protection Policy (see above).

This policy is the responsibility of the Data Protection Manager who will undertake supervision of the policy. Our IT systems may only be used for authorised purposes. We will monitor the use of our systems from time to time. Any person using the IT systems for unauthorised purposes may be subject to disciplinary and/or legal proceedings.

We will ensure information security by:

- Ensuring appropriate software security measures are implemented and kept up to date;
- Making sure that only those who need access have that access;
- Not storing information where it can be accidentally exposed or lost;
- Computer desktops are to be locked when the user is away from their computer.
- Any paper records (including print-outs) containing personal data are shredded (cross-cut) once they are no longer needed.
- Any personal data exported from central databases to excel (or similar) files should be encrypted or password protected.
- Any data processing undertaken by a third party will be arranged contractually and with due consideration. The third party will be obliged to commit in writing that they will take measures to ensure against unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Making sure that if information has to be transported it is done so safely using encrypted devices or services.

Hardware Security

- Access to systems on which information is stored must be password protected. Passwords must not be disclosed to others. If you have a suspicion that your password has been compromised you must change it.
- All Envista hardware used to process personal information should be encrypted and have up to date virus/malware protection.
- Data that is carried on laptops or other mobile devices should be adequately secured. The level of security required will depend upon the sensitivity of the data, for example personal data will require encryption.
- USB storage devices should not be used for storing personal information.
- No hardware used for processing personal information should be left visible on desks overnight or when the office is unattended. Such hardware should be locked away when not in use.
- Personally owned equipment must not be used for the processing of Envista data.

- A Mobile hotspot connection must be used when processing Envista data over unsecured or untrusted WiFi.

All breaches of this policy must be reported to the Data Protection Manager.

Signed: Date:

Name: Position:

Review Date: 25th May 2021 unless key changes in legislation require earlier review

RETENTION OF DATA AND RECORDS POLICY

Storage of Data and Records Statement

1. All data and records will be stored in accordance with the security requirements of the Data Protection Legislation and in the most convenient and appropriate location having regard to the period of retention required and the frequency with which access will be made to the record.
2. Data and records which are active should be stored in the most appropriate place for their purpose commensurate with security requirements.
3. Data and records which are no longer active, due to their age or subject, should be stored in the most appropriate place for their purpose.
4. The degree of security required for file storage will reflect the sensitivity and confidential nature of any material recorded.
5. Any data file or record which contains personal data of any form can be considered as confidential in nature.
6. Data and records should not be kept for longer than is necessary. This principle finds statutory form in the Data Protection Legislation, which requires that personal data processed for any purpose "shall not be kept for longer than is necessary for that purpose". All groups are required to have regard to the Guidelines for Retention of Personal Data (see below).
7. Any data that is to be disposed must be safely disposed of for example by shredding. Any group which does not have access to a shredder should pass material to the Data Protection Manager who will undertake secure shredding.
8. Special care must be given to disposing of data stored in electronic media.

Guidelines for Retention of Personal Data

The data retention requirements vary according to type and may be governed by statutory regulations.

Based on legal requirements and good practice, the following sets out the length of time personal data will be retained by Envista.

On an annual basis staff will seek to dispose of the data that has outlived its retention period.

If you have any queries regarding retaining or disposing of data please contact the Data Protection Manager.

(This is not an exhaustive list)

HR Records		
Record	**Retention period**	**Basis for retention period**
Application forms, interview notes and references for unsuccessful candidates	12 months	Because of the time limits in the various Discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications should be at least 6 months.

Personnel files and training records (including disciplinary records and working time records)	Seven years after employment ceases	Limitation Act 1980
Parental leave	Six years from birth/adoption of the child or 18 years if the child receives a disability allowance	Limitation Act 1980
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	Seven years following the end of the financial year	Form part of financial records - Companies Act 1985 as modified by the Companies Acts 1989 and 2006
Statutory Sick Pay records, calculations, certificates, self-certificates	Seven years following the end of the financial year	Form part of financial records - Companies Act 1985 as modified by the Companies Acts 1989 and 2006
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Seven years from the date of redundancy (12 years if more than 20 staff were made redundant).	Limitation Act 1980

Financial Information		
Record	**Retention period**	**Basis for retention period**
Accounting records	Seven years following the end of the financial year	Companies Act 1985 as modified by the Companies Acts 1989 and 2006
Wage/salary records (also overtime, bonuses, expenses)	Seven years following the end of the financial year	Taxes Management Act 1970
Income tax and NI returns, records and correspondence with the Inland Revenue	Seven years following the end of the financial year.	Companies Act 1985 as modified by the Companies Acts 1989 and 2006

Health and Safety Information		
Record	**Retention period**	**Basis for retention period**
Accident books, Accident records/reports	4 years after the date of the last entry (see Citygate Church Health and Safety Policy for accidents involving chemicals or	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

	asbestos)	
Medical records	40 years from the date of the last entry	The Control of Substances Hazardous to Health Regulations 1999 and 2002

Client Information		
Record	**Retention period**	**Basis for retention period**
Mailing list data within database	Indefinitely until client opts out.	As long as the client wishes to receive information from Envista their data will be held. If a request is given to cease communication, the details will be hidden or removed from the database as soon as possible.
Subject access requests	Four years following the last action	Data Protection Act 1998

DATA BREACH POLICY

Envista ("we") hold and process personal data which needs to be protected. Every care is taken to protect the data we hold. Compromise of information, confidentiality, integrity or availability may result in harm to individuals, reputational damage, detrimental effect on service provision, legislative non-compliance and financial penalties.
This policy sets out the procedure to be followed to ensure a consistent and effective approach throughout the organisation.
The policy relates to all personal data held by Envista, regardless of format. It applies to anyone who handles this personal data, including those working on behalf of Envista. The objective of the policy is to contain any breaches, to minimise the risks associated with the breach and to consider what action is necessary to secure personal data and prevent any further breach.

Types of breach

An incident is an event or action which may compromise the confidentiality, integrity or availability of systems or data, either accidentally or deliberately, and has caused or has the potential to cause damage to data subjects.
An incident includes but is not restricted to:

- Loss or theft of personal data or the equipment on which the data is stored e.g. laptop, memory stick, smartphone, or paper record
- theft or failure of equipment on which personal data is stored
- Unauthorised use of or access to personal data
- Attempts to gain unauthorised access to personal data
- Unauthorised disclosure of personal data
- Website defacement
- Hacking attack

Reporting an incident

Any person using personal data on behalf of Envista is responsible for reporting data breach incidents immediately to the Data Protection Manager (Jon Aske: jon@envista.co.uk) or in his absence Mark Baxter (mark@envista.co.uk) The report should contain the following details:

- Date and time of discovery of breach
- Details of person who discovered the breach
- The nature of the personal data involved
- How many individuals' data is affected

Containment and recovery

The Data Protection Manager will first ascertain if the breach is still occurring. If so, appropriate steps will be taken immediately to minimise the effects of the breach. An assessment will be carried out to establish the severity of the breach and the nature of further investigation required. Consideration will be given as to whether the police should

be informed. Advice from appropriate experts will be sought if necessary. A suitable course of action will be taken to ensure a resolution to the breach.

Investigation and risk assessment

An investigation will be carried out without delay and where possible within 24 hours of the breach being discovered (If the breach requires informing the Information Commissioner, then this must be done within 72 hours). The Data Protection Manager will assess the risks associated with the breach, the potential consequences for the data subjects, how serious and substantial those are and how likely they are to occur.
The investigation will take into account the following:

- The type of data involved and its sensitivity
- The protections in place (e.g. encryption)
- What has happened to the data
- Whether the data could be put to illegal or inappropriate use
- Who the data subjects are, how many are involved, and the potential effects on them
- Any wider consequences

Notification

The Data Protection Manager will decide, with appropriate advice, who needs to be notified of the breach. Every incident will be assessed on a case by case basis. Consideration will be given to notifying the Information Commissioner if a large number of people are affected or the consequences for the data subjects are very serious. Guidance on when and how to notify the ICO is available on their website www.ico.org.uk/media/1536/breach_reporting.pdf
Notification to the data subjects whose personal data has been affected by the incident will include a description of how and when the breach occurred, and the nature of the data involved. Specific and clear advice will be given on what they can do to protect themselves and what has already been done to mitigate the risks.
The Data Protection Manager will keep a record of all actions taken in respect of the breach.

Evaluation and response

Once the incident is contained, the Data Protection Manager will carry out a review of the causes of the breach, the effectiveness of the response, and whether any changes to systems, policies or procedures should be undertaken. Consideration will be given to whether any corrective action is necessary to minimise the risk of similar incidents occurring.

APPENDIX 1: CONFIDENTIALITY STATEMENT FOR STAFF

Establishing and maintaining positive relationships is an important value within Envista and we take our responsibility of confidentiality seriously. As a staff member for Envista, you will often have access to confidential information which may include, for example:

- Personal information about individuals who work for suppliers/customers.
- Information about the internal business of Envista.
- Personal information about colleagues working for Envista.

We rely on you to keep this information confidential, in order to protect others and the business itself. 'Confidential' means that access to information should be on a need to know and properly authorised basis. The information that you have access to use is for the purposes that have been authorised. You should also be aware that under the Data Protection Act, unauthorised access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by Envista *to* be made public. Passing information between Envista and a mailing house, or vice versa does not count as making it public. Information should not be passed to any (third party) organisations or persons.

You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security. In particular you must:

- Not compromise security measures (including allowing laptops to be used by others, sharing your computer password, leaving confidential information on your desk etc.);
- Not disclose confidential information inappropriately, either with colleagues or people outside Envista;
- Not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, check with your Line Manager or another appropriate person whether the disclosure is appropriate.

Your confidentiality obligations continue to apply indefinitely after you have stopped working for Envista. Envista appreciates your discretion and accountability in these matters.

I have read and understand the above statement. I accept my responsibilities regarding confidentiality.

Name:

Signed: Date:

APPENDIX 2: PRIVACY NOTICE ON WEBSITE

How Envista ("we") use your information

Your privacy is important to us. We are committed to safeguarding the privacy of your information. This privacy notice tells you what to expect when we collects personal information. It applies to information we collect about:

- Visitors to our website
- People who purchase products from us
- People who subscribe to our E-newsletter
- People who email us

This notice also details how we store your data as well as how you can request to see it.

Visitors to our website

Google Analytics

When someone visits www.envista.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

For more information about how Google Analytics uses your data see their website.

To opt-out of Google Analytics you can install their browser add-on.

Cookies and session tracking

Like many websites, Envista uses tiny text files called 'cookies' to enhance your browsing experience. We do not identify you through the use of cookies.

People who purchase products from us

When you purchase something from our store, as part of the buying and selling process, we collect the personal information you give us such as your name, address and email address.

We do not store credit card details nor do we share customer details with any 3rd parties. Our payment providers are Stripe and PayPal, you can view their privacy policies here: Stripe, PayPal.

People who subscribe to our E-newsletter

We use a third party provider, Mailchimp, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. This newsletter can be unsubscribed from at any time - just look for the link at the bottom of the email. For more information, please see Mailchimp's privacy policy.

People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may

not be protected in transit.
We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Storing your data

We hold your data for varying lengths of time depending on the type of information in question but in doing so we always comply with Data Protection legislation.

Who do we share your information with?

We will not share your information with third parties without your consent unless the law requires us to do so.

Requesting access to your personal data

Under Data Protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information contact us at sales@envista.co.uk.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

For further information on how your information is used, how we maintain the security of your information and your rights to access information we hold on you please contact us at sales@envista.co.uk.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance (see our Complaints Process page) or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

Contact:

If you would like to discuss anything in this privacy notice, please contact us at sales@envista.co.uk.

From time to time we may change this privacy policy so please check back when you next visit the site.

APPENDIX 3: COMPLAINT PROCEDURE

Envista Data Protection Complaints Process

Envista ("we") take your privacy concerns seriously. If you have any concerns about the way your information is being handled, please contact the Data Protection Manager (Jon Aske) without delay. Jon Aske can be contacted as follows:

01202 716100

sales@envista.co.uk

We will carefully investigate and review all complaints and take appropriate action in accordance with Data Protection Legislation. We will keep you informed of the progress of our investigation and the outcome. If you are not satisfied with the outcome, you may wish to contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Any complaint received by us must be referred to Jon Aske who will arrange for an investigation as follows:

1. A record will be made of the details of the complaint.
2. Consideration will be given as to whether the circumstances amount to a breach of Data Protection Legislation and action taken in accordance with the Data Breach Procedure.
3. The complainant will be kept informed of the progress of the complaint and of the outcome of the investigation.
4. At the conclusion of the investigation Jon Aske will reflect on the circumstances and recommend any improvements to systems or procedures.