

Ishango is fully committed to complying with the General Data Protection Regulation (GDPR), 2018. We believe that the effective management of both data and information is a critical success factor in how we run our business.

Ishango will implement management and technical arrangements to ensure we process, handle and store information in a manner that protects the interest of our employees, supply chain, customers and all other stakeholders. We will ensure that appropriate security measures are implemented to prevent the unlawful or unauthorised processing, accidental loss, or damage to personal data

We will ensure that any Ishango employee who handles or has access to personal data in any form is fully aware of their responsibilities under the General Data Protect Regulations. All employees are responsible for ensuring that;

- The handling of information containing personal information is stored securely to prevent deliberate or accidental loss
- Personal data is not disclosed to any unauthorised individual or organisation either in paper format, electronically or orally

Ishango will only engage with Supply Chain partners who demonstrate full compliance with the requirements of GDPR. We will periodically audit supply chain partner systems and process to ensure compliance with GDPR and to evaluate the effectiveness of their information security arrangements

We will implement transparent and easy to use processes that allow any individual to request information on both the data we hold and details of how we process and handle their data. We will not refuse any reasonable request and will process them in a timely and respectful manner.

### **Roles and Responsibilities**

Ishango has appointed a Data Protection Officer who is responsible for the monitoring and implementation of this policy. The Data Protection Officer will act as the first point of contact for any Data Protection queries or matter.

This policy applies to all persons working for Ishango or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, contractors and suppliers. Any breach of this Policy or its associated arrangements will not be tolerated. Any breach will be fully investigated and may be subject to the company disciplinary procedures.

### **Arrangements**

This Policy will be brought to the attention of all employees, supply chain partners and all other persons working on behalf of the Company. It will also be freely available to the public via the Company website.

Management controls covering the processing and handling of data and information are contained in the company Enterprise Management System (EMS). This Policy Statement, and the associated arrangements, will be routinely evaluated as part of the company performance monitoring and auditing processes. This Policy will be reviewed at least annually or in the event of any significant changes in the business.

### **Authorisation**



**Simon Bolderson**  
Director



**James Morgan**  
Director



**Jon Kirby**  
Director

January 2020