

This Privacy Notice for Ishango Ltd ('we', 'us', or 'our'), describes how and why we might access, collect, store, use, and/or share ('process') your personal information when you use our services ('Services'), including when you:

- Visit our website at <https://www.ishango.co.uk> or any website of ours that links to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or events

Ishango Ltd is the **data controller** responsible for your personal information under the UK General Data Protection Regulation (UK GDPR), as amended by the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

We are a company registered in England and Wales:

Company number: 10466140

Registered office: 27 Old Gloucester Street, Holborn, London WC1N 3AX, United Kingdom

VAT number: 299 9898 80

(We are established in the United Kingdom, so we do not appoint a separate UK representative under Article 27 of the UK GDPR.)

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@ishango.co.uk.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#).

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#).

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about [when and with whom we share your personal information](#).

How do we keep your information safe? We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	1 of 8



security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#).

What are your rights? Under the UK General Data Protection Regulation (UK GDPR, as amended by the Data (Use and Access) Act 2025), you have guaranteed rights over your data. These include the right to access, correct, or delete your information, and the right to lodge a formal complaint which we will acknowledge within 30 days.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a [data subject access request](#), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT? 2

2. HOW DO WE PROCESS YOUR INFORMATION?..... 3

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION? 4

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?..... 5

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES? 5

6. HOW LONG DO WE KEEP YOUR INFORMATION? 6

7. HOW DO WE KEEP YOUR INFORMATION SAFE? 6

8. DO WE COLLECT INFORMATION FROM MINORS?..... 6

9. WHAT ARE YOUR PRIVACY RIGHTS? 7

10. DO WE MAKE UPDATES TO THIS NOTICE? 8

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE? 8

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Category	Examples	Why we collect it	Lawful Basis
Identity & Contact Details	Names, job titles, company, phone, email (for logins & alerts)	To let you log in, get notifications, and help with support /onboarding.	Contract: To provide and run our app/services for you/your employer.

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	2 of 8

Category	Examples	Why we collect it	Lawful Basis
			Legitimate interests: It is needed for our business to work smoothly.
Workforce & Employment-Related Data	Worker IDs, timesheets, shifts, attendance, onboarding checks	To handle timesheets, shifts, payroll support, and worker checks.	Contract: To deliver the service your employer expects. Legal obligation: To meet legal rules, such as tax and right-to-work checks.
Location & Site-Related Data	GPS checks (for site verification), site names, access logs	To confirm you're on site and make reporting accurate/safe.	Legitimate interests: To ensure projects are run safely and efficiently. We keep it short and only when needed.
Safety, Health & Compliance Data (often sensitive)	Hazard reports, incidents, photos/videos, injury details	To report and fix safety issues, meet health & safety laws, and prevent accidents.	Legal obligation: To follow health & safety laws (Article 6). Special Category Condition: For health/injury data, we process this under Article 9(2)(b) (Employment, social security and social protection) and Schedule 1 of the DPA 2018.
Operational & Audit Data	Approvals, notes, photos, device/IP info, login times	To keep things secure, check for mistakes/fraud, and prove everything is correct.	Legitimate interests: To protect the system and sort out issues. Legal obligation: To meet record-keeping rules.
Financial/Commercial Data (indirectly personal)	Labour costs linked to people, agency invoices	To track costs fairly for project billing and invoicing.	Contract: To carry out the work your employer agreed to Legitimate interests: To manage finances properly.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	3 of 8

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user enquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The UK GDPR requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Develop and display personalised and relevant advertising content for our users (where electronic marketing is involved, we rely on consent or soft-opt-in under PECR).
 - Analyse how our Services are used so we can improve them to engage and retain users
 - Support our marketing activities
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	4 of 8

- **Consent.** Where you have given us specific, informed consent to process your data for a particular purpose (e.g., to send you marketing communications about our IT solutions, or to use non-essential cookies for personalised advertising). Learn more about [withdrawing your consent](#).

In legal terms, we are generally the 'data controller' under UK data protection laws (including the UK General Data Protection Regulation (UK GDPR) of the personal information described in this Privacy Policy, since we determine the purposes and means of the data processing we perform. This Privacy Policy does not apply to the personal information we process as a 'data processor' on behalf of our customers. In those situations, the customer that we provide services to — and with whom we have entered into a data processing agreement — is the 'data controller' responsible for your personal information. We merely process your information on their behalf and in accordance with their instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We are committed to ensuring your personal information receives an appropriate level of protection wherever it is processed. We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Internation Data Transfers:** Your personal information is currently processed only within the UK. Should we transfer data to countries not already approved by the UK government, we will ensure it receives a level of protection not materially lower than that provided in the UK using mechanisms, such as the UK International Data Transfer Agreement (IDTA)—a standard contract approved by the Information Commissioners Office (ICO)—which binds the recipient to UK-standard data protections.

We will update this policy if our practices change.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We use cookies and other tracking technologies to collect and store your information.

We use cookies and similar tracking technologies (such as web beacons and pixels) to collect and store information when you interact with our Services.

Strictly necessary cookies (for example, those required for basic site functions, security, preventing crashes, fixing bugs, and saving essential preferences) are always enabled as they are essential for the website to function securely and correctly.

Non-essential cookies (such as those used for analytics, performance improvements, or marketing/advertising purposes) are disabled by default. These will only be placed or activated if you give your explicit consent through our cookie banner.

For more details on the specific cookies we use, their purposes, durations, and any third parties involved — as well as how to manage your preferences or withdraw your consent — please see our [Cookie Policy](#).

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	5 of 8

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In short: We keep your personal information only as long as needed for the purposes in this notice, or as required by law — never longer than 2 years for most categories.

We base retention on:

- The purpose of collection (e.g., responding to your inquiry).
- Ongoing business needs (e.g., follow-up or disputes).
- Legal obligations (e.g., tax/accounting records up to 6 years in some cases).

Typical periods:

- Website inquiries/contact data: Up to 12 months after last contact (then deleted unless you become a client).
- Marketing data (with consent): Until you unsubscribe/withdraw consent, or 2 years from last engagement.
- Service/contract data: Duration of contract + up to 6 years for legal claims.
- Analytics logs: 6–12 months, then anonymised or deleted.

When no longer needed, we securely delete or anonymise it. If in backups, we isolate and delete as soon as possible (usually next cycle). We review retention regularly.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@ishango.co.uk.

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	6 of 8

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: Under UK data protection law, you have important rights over your personal information, including the right to access, correct, or delete it in many cases. You can also complain to us or the ICO if you're concerned about how we handle your data.

Under the UK General Data Protection Regulation (UK GDPR, as amended by the Data (Use and Access) Act 2025) you have the following rights (depending on the circumstances and any exemptions that may apply):

Your right to be informed – You have the right to be informed about what personal data we collect and how we use it.

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to object to automated decision-making - You can object to decisions made solely by automated means (e.g., AI) that have legal or significant effects on you. You have the right to human review, to express your view, and to contest the decision.

To exercise your rights, you can contact our Data Protection Lead by using the details in the [HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#) section below.

We will respond within 1 month (or up to 3 months for complex requests, as allowed under the UK GDPR). We will conduct reasonable and proportionate searches to fulfil your request. We do not charge a fee to respond to requests to exercise your data protection rights (such as accessing, correcting, or deleting your personal data).

In rare cases, if your request is manifestly unfounded or excessive (for example, if it is repetitive without good reason or places an unreasonable burden on us), we may charge a reasonable administrative fee based on our costs, or we may need to refuse to act on the request.

If this applies, we will always explain our reasons clearly and inform you of your right to complain to the Information Commissioner's Office (ICO).

Your right to complain - You have the right to make a complaint at any time, if you wish to do so, please contact our Data Protection Lead using the details in the [HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#) section below.

We will acknowledge your complaint within 30 days and respond without undue delay, making appropriate enquiries and keeping you informed of progress. We are committed to addressing your data protection concerns. You should raise your complaint directly with us first.

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	7 of 8

You may escalate unresolved complaints to the Information Commissioner's Office (ICO – the UK supervisory authority for data protection issues) here: <https://ico.org.uk/make-a-complaint>

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. For further information, please see our [Cookie Policy](#).

If you have questions or comments about your privacy rights, you may email us at info@ishango.co.uk.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant data protection laws.

We review this Privacy Notice at least annually or whenever our data practices change significantly. If we make material changes—such as adding new tracking technologies or changing how we share your data—we will proactively notify you before the changes take effect. This may be via a prominent notice on our homepage, a direct email, or a mandatory pop-up on your next visit. We also update the 'Last updated' date at the top of this page.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Lead by email at info@ishango.co.uk, or contact us by post at:

Ishango Ltd
27 Old Gloucester St
Holborn
London WC1N 3AX
United Kingdom

IMS REF:	ITS-POL-004		
Issue Date:	04/03/2026	Rev:	1
Document Owner:	Jon Kirby	Page:	8 of 8