

Data Protection & Privacy Policy (UK-GDPR Compliant)

This data protection policy contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who SCORNIK GERSTEIN LLP (SGLLP) shares this information with, the security mechanisms SGLLP puts in place to protect your information and how to contact SGLLP in the event you need further information.

Why a data protection policy is needed

SGLLP has produced this notice in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy explains the lawful bases on which SGLLP processes your personal data, how your data is used, who it may be shared with, and the rights available to you in relation to such processing.

What data we collect

SGLLP collects, uses and is responsible for personal information (the Information) about you. When SGLLP does this, it is the 'controller' of this Information for the purposes of the UK-GDPR and the Data Protection Act 2018.

If you need to contact SGLLP about your Information or the processing carried out on your Information, you can use the contact details at the end of this document.

SGLLP collects some or all the following Information that you provide such as:

SCORNIK GERSTEIN LLP

Registered in England and Wales. Registration no. OC368790. Registered office: 9-10 Staple Inn Buildings, 2nd Floor, Holborn, London WC1V 7QH. Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 565232). A full list of members is available at the registered office. We use the word 'partner' to refer to a member of the LLP, or an employee or consultant with equivalent standing and qualifications.

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- i. personal details
- ii. business details
- iii. services details
- iv. financial details
- v. other personal information relevant to instructions to provide legal services, including information specific to the instructions in question.

The same categories of Information may also be obtained from third parties, such as members of SGLLP, experts, members of the public, witnesses, courts and other tribunals, suppliers of goods and services, investigators, government departments, regulators, public records and registers.

How SGLLP uses your Information (Purposes)

SGLLP may use your Information for the following Purposes:

- i. to provide legal services to you, including advising, representing and acting on your behalf
- ii. to facilitate, promote and market the services of SGLLP
- iii. to train SGLLP personnel
- iv. to fulfil equality and diversity and other regulatory requirements,
- v. to procure goods and services,
- vi. to respond to requests for references
- vii. to publish legal judgments and decisions of courts and tribunals
- viii. to respond to potential complaints or make complaints
- ix. to carry out anti-money laundering and terrorist financing checks
- x. as otherwise required or permitted by law.

Marketing and promotion

In relation to Information collected for marketing purposes, said Information consists of:

- names, contact details, and name of organisation
- the nature of your interest in SGLLP's marketing

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- your attendance at SGLLP events

This will be processed so that you can be provided with information about SGLLP and to invite you to events.

SGLLP will only contact you for marketing and promotional purposes where you have provided your express consent or where SGLLP is otherwise permitted to do so under applicable law.

The legal basis for processing your Information

SGLLP relies on the following lawful bases under Article 6 (and, where applicable, Article 9) of the UK GDPR to collect and use your personal information. The lawful basis relied upon depends on the specific purpose for which your Information is being processed:

- **Performance of a contract:** Where you instruct SGLLP to provide legal services, SGLLP processes your Information as necessary for the performance of the contract between you and SGLLP, or in order to take steps at your request prior to entering into such a contract (Article 6(1)(b) UK GDPR).
- **Legal obligation:** SGLLP is required by law to process certain Information, including to comply with anti-money laundering and terrorist financing legislation, tax obligations, and regulatory requirements imposed by the Solicitors Regulation Authority (Article 6(1)(c) UK GDPR).
- **Legitimate interests:** SGLLP may process your Information where it is necessary for the purposes of legitimate interests pursued by SGLLP or a third party, provided those interests are not overridden by your rights and freedoms. This includes processing for the purposes of training, internal administration, business development, and the establishment, exercise or defence of legal rights (Article 6(1)(f) UK GDPR).
- **Consent:** Where SGLLP sends you direct marketing communications, it relies on your consent as the lawful basis for that processing (Article 6(1)(a) UK GDPR). You may withdraw your consent at any time by contacting SGLLP using the details at the end of this policy or by clicking the “unsubscribe” link in any marketing email. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.
- **Substantial public interest:** In certain circumstances, SGLLP may process special category data where the processing is necessary for reasons of substantial public interest, including the prevention or detection of unlawful acts, or for the purposes of equality and diversity monitoring (Article 9(2)(g) UK GDPR, read

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with Schedule 1 of the Data Protection Act 2018). SGLLP maintains an appropriate policy document as required.

- Legal proceedings: SGLLP is entitled to process your Information, including special category data, where the processing is necessary for the establishment, exercise or defence of legal claims (Article 9(2)(f) UK GDPR).
- Compliance with a legal obligation: In certain circumstances, processing may be necessary in order for SGLLP to comply with a legal obligation to which it is subject, including carrying out anti-money laundering or terrorist financing checks (Article 6(1)(c) UK GDPR).

Who will SGLLP share your Information with?

It may be necessary to share your Information with the following:

- information processors, such as IT support staff, email providers, information storage providers
- in the event of complaints, SGLLP's complaints partner, Mr. Antonio Arenas, the Solicitors Regulation Authority and the Legal Ombudsman.
- other regulatory authorities
- current, past or prospective employers or employees
- legal professionals
- experts and other witnesses
- prosecution authorities
- courts and tribunals
- SGLLP's staff
- trainee lawyers
- family and associates of the person whose Information SGLLP is processing
- business associates, professional advisers and trade bodies, e.g. the Law Society
- the intended recipient, where you have asked SGLLP to do so
- the general public in relation to the publication of legal judgments and decisions of courts and tribunals

SGLLP may be required to provide your Information to regulators, such as the Legal Ombudsman, the Financial Conduct Authority or the Information Commissioner's Office. In the case of the Information Commissioner's Office, there is a risk that your

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Information may lawfully be disclosed by them for the purpose of any other civil or criminal proceedings, without SGLLP's consent or your consent, which may include privileged information.

SGLLP may also be required to disclose your Information to the police or intelligence services, where required or permitted by law.

Sources of information

The Information SGLLP obtains may include information obtained from:

- legal professionals
- experts and other witnesses
- prosecution authorities
- courts and tribunals
- trainee solicitors
- lay and professional clients of members of SGLLP
- family and associates of the person whose personal information SGLLP is processing
- in the event of complaints, SGLLP's complaints partner, Mr Antonio Arenas, and the Legal Ombudsman
- other regulatory authorities
- current, past or prospective employers
- education and examining bodies
- business associates, professional advisers and trade bodies, e.g. the Solicitors Regulation Authority
- the intended recipient, where you have asked SGLLP to provide a reference
- the general public in relation to the publication of legal judgments and decisions of courts and tribunals
- data processors, such as IT support staff, email providers, data storage providers
- public sources, such as the press, public registers and law reports.

If SGLLP decides to publish a judgment or other decision of a Court or Tribunal containing your Information, it may be published to the world.

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SGLLP may transfer your Information outside the United Kingdom where necessary for the provision of legal services or the conduct of legal proceedings. Where SGLLP transfers Information outside the UK (including to its associated offices in Spain and other jurisdictions), it will ensure that appropriate safeguards are in place in accordance with UK GDPR, such as the UK's standard contractual clauses or reliance on a UK adequacy decision.

If you would like any further information, about international transfers please use the contact details at the end of this document.

How long will SGLLP store your Information?

SGLLP will normally store all your Information:

1. Client matter files and related Information will be retained for a minimum of six years after the conclusion of the matter or the end of the client relationship, whichever is later. This period reflects the primary limitation period under the Limitation Act 1980 and SRA regulatory requirements. At the end of this period, the Information will be reviewed and either marked for deletion or retained for a further specified period where it is needed for ongoing legal proceedings, regulatory matters or active complaints. Deletion will be carried out as soon as reasonably practicable after the Information is marked for deletion.
2. Equality and diversity data may be retained in pseudonymised form for the purpose of research and statistics and complying with regulatory obligations in relation to the reporting of equality and diversity data.
3. Names and contact details held for marketing purposes will be stored indefinitely or until SGLLP becomes aware or is informed that the individual has ceased to be a potential client.

What do we do with your Information?

Your Information will be used only for the purposes, described in this policy. SGLLP will retain your Information for the periods set out above and will securely delete or destroy it when it is no longer required, unless SGLLP is required by law or regulation to retain it for a longer period.

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Please note that, in accordance with current anti-money laundering regulations, SGLLP is required to verify your identity and collect certain Information before it can accept instructions from you.

Consent

Where SGLLP relies on your consent as the lawful basis for processing (for example, for direct marketing communications), you have the right to withdraw that consent at any time by contacting SGLLP using the details at the end of this policy.

Withdrawal of consent will not affect the lawfulness of any processing carried out prior to the withdrawal. Where SGLLP also relies on other lawful bases for processing your Information (such as performance of a contract or legal obligation), those processing activities will continue notwithstanding the withdrawal of your consent.

If you have any concerns about how your Information is being processed, please contact SGLLP using the contact details below.

Your Rights

Under the UK GDPR, you have several rights that you can exercise as to requesting us to access your Information in certain circumstances. Requests to exercise these rights are handled free of charge. In summary, you may have the right to:

- Ask for access to your Information and other supplementary information;
- Ask for correction of mistakes in your Information or to complete missing Information SGLLP holds on you;
- Ask for your Information to be erased, in certain circumstances;
- Receive a copy of your Information that you have provided to us, or have this information sent to a third party. This will be provided to you or the third party in a structured, commonly used and machine-readable format, e.g. a PDF file;
- Object at any time to the processing of your Information for direct marketing;
- Object in certain other situations to the continued processing of your Information;
- Restrict the processing of your Information in certain circumstances;
- Request not to be subject to automated decision-making which produces legal effects that concern you or affects you in a significant way.

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If you want more information about your rights under the UK GDPR, please see the guidance from the Information Commissioner's Office on individuals' rights under the UK GDPR.

If you want to exercise any of these rights, please:

- Use the contact details at the end of this document;
- SGLLP may need to ask you to provide other information so that you can be identified;
- Please provide a contact address so that you can be contacted to request further information to verify your identity;
- Provide proof of your identity and address;
- State the right or rights that you wish to exercise.

SGLLP will respond to you within one month from when it receives your request.

How to make a complaint?

If you have a concern about how we use your Information or about how we have handled your data protection rights, you have the right to make a complaint directly to us. You can make a complaint by emailing us at london@scornik.com.

We will acknowledge your complaint within 30 days of receiving it. We will take appropriate steps to consider your complaint and respond without undue delay.

Once we have considered your complaint, we will tell you the outcome as soon as possible and explain clearly how the issue has been dealt with, including any steps we have taken. If you are not satisfied with our response, you may complain to the Information Commissioner's Office (ICO).

You can contact the Information Commissioner's Office via its website at <https://ico.org.uk/make-a-complaint/> or by telephone on 0303 123 1113.

SGLLP does not use any automated decision-making processes (including profiling) that produce legal effects concerning you or similarly significantly affect you.

Security of your Information

SGLLP takes the security of your Information seriously. SGLLP has implemented appropriate technical and organisational measures to protect your Information against

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unauthorised or unlawful processing, accidental loss, destruction or damage. These measures include the use of encrypted email communications, secure IT infrastructure, restricted access controls, and regular staff training on data protection and information security. Where SGLLP engages third-party data processors, it ensures that appropriate contractual safeguards are in place.

Cookies

SGLLP's website may use cookies and similar technologies. For further information about the cookies used on our website and how to manage your cookie preferences, please refer to the cookie notice on our website at www.scornik.com.

Marketing Emails

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by clicking the "unsubscribe" link at the bottom of our marketing emails.

Future Processing

SGLLP does not intend to process your Information except for the reasons stated within this Data Protection Policy. If this changes, this Data Protection Policy will be amended and placed on the SGLLP's website at www.scornik.com.

Changes to this privacy notice

This privacy notice was published on 18th June 2026.

SGLLP continually reviews its privacy practices and may change this policy from time to time. When it does, an amended privacy notice will be placed on SGLLP's website: www.scornik.com.

Should you have any query about the content of this policy please do let us know.

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Contact Details

If you have any questions about this privacy notice or the information SGLLP holds about you, please contact SGLLP using the contact details below.

The best way to contact SGLLP is to write to its Managing Partner, Antonio Arenas, by email at antonio.arenas@scornik.com or by phone at 0207 831 7070. Mr Arenas also acts as SGLLP's data protection contact.

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