ST JOHN STREET CHAMBERS

PRIVACY POLICY OF:

Barrister: Mike Wilkinson

18 St John Street Chambers, 18 St John Street, Manchester, M3 4EA

ICO REGISTRATION NUMBER: ZB653167

Policy became operational on: 1st June 2025 (revised and amended 28th April 2026, and 12 October 2026)

Next review date: 12 October 2027

Data controller

I, Mike Wilkinson, am a member of 18 St John Street Chambers. I am registered with the Information Commissioner's Office (ICO) as a Data Controller for the personal data that I hold and process as a barrister. My registered address is 18 St John Street Chambers and my ICO registration number is ZB653167. If you need to contact me about your data or this privacy notice, you can reach me at clerks@18sjs.com

18 St John Street Chambers is an unincorporated association of self-employed barristers. Some administrative and marketing functions are carried out for me by barristers who serve as officers of chambers ("Chambers' Officers") and by the staff and contractors they engage. In most cases they process personal data on my behalf as my processor. In some circumstances they may jointly determine with me the purposes and means of processing, in which case they act as joint controllers. [

This privacy notice describes the information I collect about you, how it is used and shared, and your rights regarding it.

In order to provide legal advice and representation, I need to collect and hold personal information. This may be your personal data or information relating to other parties involved in the matter. I will protect your data and implement appropriate technical and organisational measures proportionate to risks to your data. I will ensure I do not do anything that infringes your rights or undermines your trust.

Data collection

The vast majority of the information that I hold about you is provided to, or gathered by, me in the course of your case and/or proceedings. Your solicitor and/or I will tell you why we need the information and how we will use it.

If you do not provide information that I reasonably require, I may be unable to act for you or to advise you fully. Some information may be required to meet legal or regulatory obligations, for example identity information where anti-money laundering rules apply to the work.

In addition to the information you may provide to me or your solicitor, I also obtain information from other sources as follows:

- Information that is available publicly in registers, searches or in the media
- Other legal professionals including solicitors and barristers and their associates, trainees and staff
- Chambers staff
- Expert witnesses
- Prosecution bodies
- Regulatory, public or administrative bodies
- Court staff & officials
- Clients
- References

What data do I process about you?

Depending on the type of work, I collect and process both personal data and special categories of personal data as defined in the UK GDPR. This may include:

- Name
- Email address
- Phone number
- Address
- Payment or bank details
- Date of birth
- Next of kin details
- Details pertaining to education and employment
- Information on your background & current circumstances
- Financial information.

Where relevant, I may also need to process special category personal data that reveals your:

- Racial or ethnic origin
- Political opinions
- Religious and philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person
- Data concerning health
- Sex life and sexual orientation.

I may also process personal data relating to criminal convictions and offences.

My lawful basis for processing your information

In order that I can provide legal services and representation for you, I must process your personal data. The UK General Data Protection Regulation (the UK GDPR) requires that where I process personal data, I must have a lawful basis for doing so. The lawful bases identified in the UK GDPR that I seek to rely upon are as follows:

- Performance of a contract with the data subject, or to take steps to enter into a contract. This applies where I contract with you directly, for example under a public access arrangement. Where I am instructed by a solicitor, my contract is ordinarily with the solicitor and I rely instead on legitimate interests.
- Compliance with a legal obligation – to comply with various regulatory and professional obligations, e.g. filing tax returns with HMRC.
- The legitimate interests of my business or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Examples of legitimate interests include but are not limited to:

- Provision of legal services and advice.
- For purposes of practice management, accounting and debt recovery.
- For completion of professional regulatory requirements.
- Processing for direct marketing purposes, where permitted by applicable electronic-communications law.
- Reporting threats to public security.
- To prevent fraud.
- Such other purposes as set out below.

Special category processing

The UK GDPR requires me to have an Article 6 lawful basis and an applicable condition in Article 9(2) when processing special category personal data. In my practice, the conditions that may apply include:

1. I have your explicit consent, where appropriate (Article 9(2)(a));
2. It is necessary for the establishment, exercise or defence of legal claims (Article 9(2)(f));
3. It is necessary for reasons of substantial public interest (Article 9(2)(g)), where a condition in Part 2 of Schedule 1 to the Data Protection Act 2018 applies, for example preventing or detecting unlawful acts, or suspicion of terrorist financing or money laundering; or
4. The information has been manifestly made public by you (Article 9(2)(e)).

Criminal data processing

I process data relating to criminal convictions and offences only where I have an Article 6 lawful basis and a condition in Part 1, 2 or 3 of Schedule 1 to the Data Protection Act 2018 that applies. In my practice, paragraph 33 of Schedule 1 is likely to apply where processing is necessary for:

- The purpose of, or in connection with, any legal proceedings
- The purpose of obtaining legal advice; or
- The purposes of establishing, exercising or defending legal rights
- Consent alone does not authorise processing under Article 10 UK GDPR unless an applicable condition in Schedule 1 to the Data Protection Act 2018 also applies.

Purposes:

I use your personal information for the following purposes:

- Provide legal advice and representation
- Assist in training pupils and mini pupils
- Investigate and address your concerns
- Communicate with you about news, updates and events
- Investigate or address legal proceedings relating to your use of my services, or as otherwise allowed by applicable law
- Make statutory returns as required by HMRC
- Assist in any tendering or panel membership applications using only information that is publicly available or that a client agrees may be disclosed
- Assist in any other applications for the purpose of professional development or career progression, on the same basis as panel applications above
- Communicate legal updates and judgments to other legal professionals
- For marketing purposes
- For the management and administration of my practice
- To recover debt
- To manage complaints with regulators
- Communications with regulators where relevant to conduct anti-money laundering, terrorist financing or conflict of interest checks

Sharing information

In the course of processing your information to provide legal services to you, I may share your personal data with:

- Instructing solicitors or other lawyers involved in your case
- A pupil or mini pupil, under my training

- Opposing counsel, for the purposes of resolving the case
- Opposing lay clients or opposing solicitors
- Court Officials, including the Judiciary
- My chambers' management and staff who provide administrative services for my practice
- Expert witnesses and other witnesses
- Any person I engage to assist me with working on your case including any other barristers or professional colleagues whose advice I seek (see below)
- Artificial intelligence and technology service providers (see below)
- Any software company or support staff I engage to record and transcribe conversations, for example to keep a record of a conference
- My regulator or legal advisors in the event of a dispute, complaint or other legal matter
- Head of Chambers or complaints committee within my chambers, in the event of a complaint
- Law enforcement officials, government authorities, or other third parties, to meet any legal obligations
- Legal directories, for the purpose of professional development, using only information that is publicly available or that the client has agreed may be disclosed
- Any relevant panel or tendering committee, for the purpose of professional development, on the same basis as legal directories above
- Accountants and banking officials
- Regulators or arbitrators, where complaints or disputes arise
- Any other party where I ask you for consent, and you consent, to the sharing

- I may also be required to disclose your information to the Police or Intelligence services where required by law or pursuant to a court order

Engaging others

I may engage others for example to proof-read documents prior to submission or if I outsource or "devil" any work to any persons I collaborate with to work on your case (such as King's Counsel or other leader or another barrister as part of a legal team or potential team). Any proofreaders, devils and collaborators will be subject to professional confidentiality or equivalent contractual obligations. . Where a person I engage acts as my processor, I will put in place a written contract meeting the requirements of Article 28 of the UK GDPR.

I may occasionally discuss a legal or procedural issue arising from a matter with other barristers or suitably qualified professional colleagues, for the purpose of testing or obtaining a professional view on my analysis or proposed advice. Consistent with my professional duty of confidentiality, such discussions will be conducted on an anonymised basis wherever possible, and otherwise only with your consent or where disclosure is required or permitted by law. In all such cases, I remain responsible for the advice ultimately provided.

AI service providers

I may also use appropriately assessed professional or enterprise-grade artificial-intelligence services, including Lexis Protégé, Westlaw Advantage, Microsoft 365 Copilot or Claude Teams or Enterprise, to assist with legal research, document review and organisation, chronologies, summaries, and the drafting or checking of work. I remain professionally responsible for my work and do not use AI to make solely automated decisions about individuals that produce legal or similarly significant effects. I do not use consumer-grade or publicly accessible AI services to process client data. I will use client data with an AI service only where the service and the configuration I use are subject to appropriate contractual, confidentiality and data-protection terms. For processing carried out on my instructions, I will require the provider to act as a processor and will select terms and settings that prevent client prompts and outputs from being used to train general-purpose models. I will apply data minimisation and appropriate security measures, such as using pseudonyms where appropriate, limiting access and protecting accounts. Some AI and technology providers or their subprocessors may process personal data outside the United Kingdom; this is addressed in the "International transfers" section below.

International Transfers

Some of my technology, cloud-storage, communications, research, transcription and artificial-intelligence service providers, or their subprocessors, may store or process personal data outside the United Kingdom. This may include processing in the United States, the European Economic Area and other countries in which those providers

operate. Where personal data is transferred from the United Kingdom in circumstances requiring a restricted-transfer safeguard, whether by me or by a provider acting on my behalf, I will ensure that an appropriate transfer mechanism is in place. Depending on the circumstances, this may include UK adequacy regulations, the International Data Transfer Agreement, the UK Addendum to the European Commission's Standard Contractual Clauses, or another safeguard permitted by UK data-protection law. Where required, I will also carry out the applicable assessment to ensure that the transfer provides an appropriate standard of protection under UK law.

Retention of data

I retain personal data only for as long as it is reasonably required for the purposes for which it was collected, including providing legal services, complying with legal, tax, regulatory and professional obligations, and establishing or defending potential legal claims. I will ordinarily retain the principal case file for seven years after the later of the conclusion of the matter or receipt of final payment. A longer or shorter period may apply where justified by the nature of the matter, applicable limitation periods (including the extended periods that can apply to negligence claims involving latent damage), the age or capacity of a party, a complaint or potential claim, regulatory requirements, or another legal obligation. Different retention periods may apply to financial records, conflict-checking information, marketing information and records held by service providers. When information is no longer required, it will be securely deleted or anonymised.

Documents retained as precedents or for legal research will be anonymised or appropriately redacted unless continued identification is lawfully necessary.

Your rights

The UK GDPR gives you specific rights in terms of your personal data. For example individuals may have rights to:

- Access their information
- Correct inaccurate information
- Erasure
- Restriction of processing
- Data portability
- Object to processing, including an absolute right concerning direct marketing
- Withdraw consent where consent is relied upon
- Complain about the processing
- Receive appropriate protection concerning significant automated decisions

Some of these rights are subject to exemptions under the Data Protection Act 2018. In particular, I may withhold information that is subject to legal professional privilege. Where I obtain personal data about you from someone other than you, I may not be required to notify you where the information must remain confidential under an obligation of professional secrecy.

Data-protection complaints

You may raise a data-protection complaint by contacting me at clerks@18sjs.com. You do not need to use any particular form of words. I will acknowledge a complaint within 30 days, make appropriate enquiries without undue delay, keep you informed where appropriate and notify you of the outcome. You also have the right to complain to the Information Commissioner's Office. I would ordinarily ask that you give me an opportunity to address your concern first, although this does not affect your right to contact the ICO.

You can find out more information from the ICO's website:

https://ico.org.uk/make-a-complaint/

Exercising your rights

You may exercise any of these rights, including requesting request access to, correction of, or a copy of your information by contacting me at clerks@18sjs.com

Marketing opt-outs

You may opt out of receiving emails and other messages from my practice by following the instructions in those messages.

I will occasionally update my privacy notice. When I make significant changes, I will publish the updated notice on my chambers' website profile.