

# LOSTOCK LEGAL SOLICITORS LTD

## RECORD OF PROCESSING ACTIVITIES

Article 30 UK GDPR | Reference: LL-DP-004 | Version 1.0 | June 2026

This Record of Processing Activities (ROPA) is maintained by Lostock Legal Solicitors Ltd in accordance with Article 30 of the UK GDPR. It documents all categories of processing activity carried out by the Firm as data controller. This document is confidential and is not for external distribution. It must be made available to the Information Commissioner's Office upon request.

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>SRA Number</b>	8007582
<b>DPL Contact</b>	dataprotection@lostocklegal.co.uk
<b>ICO Reg No.</b>	 Registration Certificate - ZB73087 REF: ZB730878
<b>Date Prepared</b>	June 2026
<b>Review Date</b>	June 2027 (or earlier if processing activities change materially)

## Processing Activities

The following records document each category of processing activity carried out by the Firm. Each entry must be reviewed and updated whenever a new processing activity is introduced or an existing activity changes materially.

Processing Activity 1: Client Matter Handling	
<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To provide legal advice and representation to clients; to conduct and manage legal proceedings on behalf of clients; to comply with court orders and procedural requirements.
<b>Subjects</b>	Current and prospective clients; third parties to legal proceedings (e.g. witnesses, opposing parties where their data is processed by us); next of kin where relevant.
<b>Data Types</b>	Name, address, date of birth, contact details, financial information, matter-specific legal information, criminal history (where relevant), health/medical information (where relevant to the matter), identification documents.
<b>Recipients</b>	Courts and tribunals; barristers and expert witnesses; opposing parties and their solicitors; DVLA; HMRC; CPS; police; medical professionals; professional indemnity insurers.
<b>Transfers</b>	No transfers outside UK in normal course. Where required, appropriate safeguards in place under UK GDPR / DUAA 2025.

<b>Retention</b>	6 years from conclusion of matter (general). 12 years for property/wills matters. Longer where required by ongoing proceedings or regulatory obligation.
<b>Security</b>	Encrypted case management system; access controls; role-based permissions; secure email; physical file security; staff confidentiality obligations.

### Processing Activity 2: Anti-Money Laundering and Client Due Diligence

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To comply with obligations under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and the Proceeds of Crime Act 2002; to verify client identity; to conduct risk assessments.
<b>Subjects</b>	All clients and beneficial owners of client entities.
<b>Data Types</b>	Name, date of birth, address, nationality, identification documents (passport, driving licence, utility bills), financial information, source of funds documentation.
<b>Recipients</b>	HMRC (where required to make a Suspicious Activity Report); National Crime Agency (SAR disclosures); SRA (regulatory reporting); AML compliance software provider (under DPA).
<b>Transfers</b>	No routine international transfers. SAR disclosures to NCA as legally required.
<b>Retention</b>	5 years from end of business relationship (Money Laundering Regulations 2017 requirement).
<b>Security</b>	Encrypted storage; restricted access; secure document management; audit trail of CDD checks.

### Processing Activity 3: Employee and HR Data

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To manage the employment relationship including recruitment, payroll, performance management, absence management, disciplinary procedures, and compliance with employment law.
<b>Subjects</b>	Employees (permanent, temporary, part-time); job applicants; former employees.
<b>Data Types</b>	Name, address, contact details, date of birth, NI number, bank details, payroll and tax records, employment history, qualifications, references, performance records, disciplinary records, sickness/absence records, right to work documentation.
<b>Recipients</b>	HMRC (payroll/PAYE); pension providers; occupational health providers; employment tribunal (if applicable); SRA (for regulated staff); professional indemnity insurers.
<b>Transfers</b>	No international transfers in normal course.
<b>Retention</b>	Duration of employment plus 6 years. Payroll/tax records: 6 years (HMRC). Unsuccessful recruitment applications: 6 months unless consent obtained for longer retention.
<b>Security</b>	HR system access controls; restricted access to payroll data; secure storage of personnel files; encryption of digital HR records.

### Processing Activity 4: Marketing and Business Development

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To send marketing communications to prospective and existing clients who have consented to receive them; to promote the Firm's services via email, post, and digital channels.
<b>Subjects</b>	Existing clients (where legitimate interests apply for similar services); prospective clients and contacts who have given consent.

<b>Data Types</b>	Name, email address, telephone number, area of interest/enquiry, consent records.
<b>Recipients</b>	Email marketing platform provider (under DPA); CRM system provider (under DPA).
<b>Transfers</b>	No international transfers without appropriate safeguards.
<b>Retention</b>	Until consent withdrawn; consent records retained for 3 years thereafter as evidence of compliance.
<b>Security</b>	Consent records maintained; unsubscribe mechanism on all emails; CRM access controls; data processing agreements with all third-party platforms.

### Processing Activity 5: Website and Digital Enquiries

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To respond to enquiries submitted via website contact forms; to provide information about the Firm's services; to manage incoming new client enquiries.
<b>Subjects</b>	Website visitors who submit enquiries; prospective clients.
<b>Data Types</b>	Name, email address, telephone number, brief description of legal matter, IP address, device/browser data (via cookies).
<b>Recipients</b>	Case management system (if enquiry progresses to instruction); email system provider (under DPA); website analytics provider (under DPA).
<b>Transfers</b>	No international transfers in normal course. Analytics providers who transfer data outside UK: appropriate safeguards in place.
<b>Retention</b>	12 months from date of enquiry, or until instructed (whichever is earlier). Analytics data: 26 months (standard retention).
<b>Security</b>	SSL/TLS encryption on website; contact form data transmitted securely; analytics data anonymised where possible; cookie consent mechanism.

### Processing Activity 6: Data Subject Rights Requests

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To handle and respond to Subject Access Requests (SARs) and other data subject rights requests in accordance with UK GDPR and DUAA 2025; to maintain accountability records.
<b>Subjects</b>	Any individual exercising data subject rights — clients, employees, third parties.
<b>Data Types</b>	Name, contact details, copy of ID (where required for verification), description of request, correspondence relating to the request, and the personal data disclosed in response.
<b>Recipients</b>	No external sharing in normal course. ICO (if matter escalated).
<b>Transfers</b>	No international transfers.
<b>Retention</b>	3 years from date of response (as evidence of compliance and to handle any ICO investigation).
<b>Security</b>	Secure storage; restricted access; requests handled by Data Protection Lead only.

### Processing Activity 7: Data Protection Complaints

<b>Controller</b>	Lostock Legal Solicitors Ltd
<b>Purpose</b>	To handle and investigate data protection complaints in compliance with Section 103 DUAA 2025 / DPA 2018 s.164A (effective 19 June 2026); to maintain a complaints log for accountability purposes.
<b>Subjects</b>	Any individual who submits a data protection complaint.

<b>Data Types</b>	Name, contact details, description of complaint, investigation records, correspondence, outcome records.
<b>Recipients</b>	ICO (if matter escalated by complainant).
<b>Transfers</b>	No international transfers.
<b>Retention</b>	3 years from date of resolution of complaint.
<b>Security</b>	Complaints log held securely; access restricted to Data Protection Lead and Compliance Partner; encrypted storage.

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## Maintenance and Review

This ROPA must be reviewed in full at least annually. It must also be updated promptly whenever:

- A new processing activity is introduced
- An existing processing activity changes materially in purpose, data type, recipients, or retention period
- A new third-party processor is engaged
- There is a material change in the applicable law or ICO guidance

Responsibility for maintaining this ROPA sits with the Data Protection Lead. Any proposed new processing activity must be notified to the Data Protection Lead before commencement, so that this record can be updated and any necessary DPIA conducted.