

Edition date: June 2026

DATA PROTECTION PRIVACY NOTICE

1. The business of **Art Notarial Services Limited** (t/a **Tom Ginot Notary Public**) incorporated in England and Wales with company registration number 15559305 whose registered office is at 37-41 Bedford Row, London, WC1R 4JH ("**Business**", "**we**", "**us**" "**our**"). The Business is registered with the Information Commissioner's Office ("**ICO**") under number: ZB674682.
2. If you have any questions about this privacy notice ("**Notice**"), please contact us by email.
3. The Business will process your and third parties' personal data, as further explained below, in the course of providing you with notarial services and certain non-reserved legal services (including corporate legal services), together with related and associated services and access to our website and online features ("**Services**").
4. We will let you know, by posting on our website or otherwise, if we make any changes to this Notice from time to time. Your continued use of the Services after notifying such changes will amount to your acknowledgement of the amended Notice.

What is Personal Data?

5. "**Personal data**" means any information relating to an identified or identifiable natural person, known as '**data subject**', who can be identified directly or indirectly; it may include name, address, email address, phone number, IP address, location data, cookies and similar information. It may also include "**special categories of personal data**" such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a data subject, data concerning health or data concerning a natural person's sex life or sexual orientation.
6. The Business may process personal data and special categories of personal data which you provide in connection with the Services about yourself and other data subjects, e.g. individuals whose details are included in any materials provided by you to the Business. The Business may obtain information about you and other data subjects from third party service providers, such as due diligence platforms. If you use our online Services, the Business may collect information about your devices including clickstream data.
7. The personal information we hold about you may include:
 - 7.1 your name and contact details;
 - 7.2 information we use to check and verify your identity, such as your date of birth and your passport, driving licence or identity card details;

Tom Ginot Notary Public
is the trading name of Art Notarial Services Limited
Registered in England and Wales with Company No. 15559305
VAT Registration Number: 481 474278
37-41 Bedford Row, London, WC1R 4JH
Tel: +44 (0) 77 636 90 626
Email: tom@tomginotary.co.uk
www.tomginotary.co.uk

Regulated through the Faculty Office of the Archbishop of Canterbury.

- 7.3 the results of identity, sanctions and politically exposed person screening;
 - 7.4 information relating to your matter and your instructions;
 - 7.5 your financial details, so far as they are relevant to your instructions, including source of funds and source of wealth information;
 - 7.6 details of third parties involved in your matter; and
 - 7.7 where relevant, special categories of personal data, as described above.
8. The provision of certain personal data is mandatory in order for the Business to comply with mandatory client due diligence requirements and consequently to provide the Services. You warrant on a continuous basis that such personal data is accurate, complete and up to date. Failure to comply may result in documents being rejected by the relevant certification authorities, held invalid in the destination country or other difficulty to successfully completing the Services.
9. In relation to personal data of data subjects you warrant to the Business on a continuous basis that:
- 9.1 where applicable, you are authorised to share such personal data with the Business in connection with the Services and that wherever another data subject is referred to, you have obtained the explicit and demonstrable consent from all relevant data subjects to the inclusion and use of any personal data concerning them;
 - 9.2 to the extent this is required in connection with the Services, such personal data is accurate, complete and up to date; and
 - 9.3 either you provide your explicit consent and warrant that each data subject has provided explicit consent for the transfer of personal data to foreign organisations in connection with the Services as set out at paragraph 17, or that an alternative legal gateway for such transfer (such as transfer necessary for the conclusion or performance of a contract concluded in the interest of the data subject) has been satisfied.

How do we use your personal data?

10. The Business will only process personal data, in accordance with applicable law, for the following purposes:
- 10.1 **responding to your queries, requests and other communications;**
 - 10.2 **providing the Services**, including, where applicable, procuring acts from foreign organisations;

- 10.3 **enabling suppliers and service providers to carry out certain functions on behalf of the Business in order to provide the Services**, including web-hosting, data storage, identity verification, technical, logistical, courier or other functions, as applicable;
- 10.4 **allowing you to use features on our website**, when you choose to do so;
- 10.5 **ensuring the security of the Business and preventing or detecting fraud**;
- 10.6 **administering the Business**, including complaints resolution, troubleshooting of our website, data analysis, testing of new features, research, statistical and survey purposes;
- 10.7 **developing and improving the Services**;
- 10.8 **complying with applicable law**, including the Notarial Practice Rules 2019, guidelines and regulations or in response to a lawful request from a court or regulatory body.

The legal basis for the processing of personal data for the purposes described above will typically include:

- 10.9 processing necessary to fulfil a **contract** that we have in place with you or other data subjects, such as processing for the purposes set out in paragraphs 10.1, 10.2 and 10.4;
- 10.10 processing necessary for our or a third party's **legitimate interests**, such as processing for the purposes set out in paragraphs 10.1, 10.2, 10.5, 10.6 and 10.7, which is carried out on the basis of the legitimate interests of the Business to ensure that Services are properly provided, the security of the Business and its clients and the proper administration of the Business; and
- 10.11 processing necessary for compliance with a **legal obligation** to which we are subject, such as processing for the purposes set out in paragraph 10.8; and
- 10.12 any other applicable legal grounds for processing from time to time.
- 10.13 In addition, where we process special categories of personal data, we rely on one or more conditions under Article 9 of the UK GDPR, which will usually be that the processing is necessary for the establishment, exercise or defence of legal claims, that it is necessary for reasons of substantial public interest, or that you have given your explicit consent.

Cookie statement

What exactly are cookies?

- 11. In order to collect the information including personal data as described in this Notice, we may use cookies and similar technology on our website. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of the Services offered through our website may not function properly if your cookies are disabled.

Tom Ginot Notary Public
is the trading name of Art Notarial Services Limited
Registered in England and Wales with Company No. 15559305
VAT Registration Number: 481 474278
37-41 Bedford Row, London, WC1R 4JH
Tel: +44 (0) 77 636 90 626
Email: tom@tomginotary.co.uk
www.tomginotary.co.uk

Regulated through the Faculty Office of the Archbishop of Canterbury.

12. Cookies can be first party or third party cookies.

12.1 **First party cookies** – cookies that the website you are visiting places on your device.

12.2 **Third party cookies** – cookies placed on your device through the website but by third parties, such as Google.

The cookies placed on our website

13. We use the following cookies on our website:

13.1 Strictly necessary cookies. These cookies are essential in order to enable you to move around our website and use its features. Without these cookies, Services you have asked for cannot be provided. They are deleted when you close the browser. These are first party cookies.

13.2 Performance cookies. These cookies collect information in an anonymous form about how visitors use our website. They allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it and the approximate regions that they are visiting from. These are first party cookies.

13.3 Functionality cookies. These cookies allow our website to remember choices you make (such as your user name, language or the region you are in, if applicable) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. These are first party cookies.

13.4 Targeting or advertising cookies. These cookies allow us and our advertisers (if any) to deliver information more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of advertising campaigns. They remember that you have visited our website and may help us in compiling your profile. These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.

13.5 Social Media cookies. These cookies allow you to connect with social media networks such as LinkedIn and X (formerly Twitter). These are persistent cookies which will be kept on your device until their expiration or earlier manual deletion.

14. We may combine information from these types of cookies and technologies with information about you from other sources.

Cookie consent and opting out

15. We will only place non-essential cookies (including performance, functionality, targeting or advertising and social media cookies) on your device where you have given your active consent, which we obtain through the cookie banner displayed when you first visit our

Tom Ginot Notary Public
is the trading name of Art Notarial Services Limited
Registered in England and Wales with Company No. 15559305
VAT Registration Number: 481 474278
37-41 Bedford Row, London, WC1R 4JH
Tel: +44 (0) 77 636 90 626
Email: tom@tomginotary.co.uk
www.tomginotary.co.uk

Regulated through the Faculty Office of the Archbishop of Canterbury.

website. Strictly necessary cookies do not require your consent. You can withdraw or change your consent at any time using the cookie settings on our website or by adjusting your browser settings. If you choose to decline non-essential cookies, you may not be able to fully experience all of the interactive features of our website, our platforms and Services.

Disclosure of personal data

- 16.** There are circumstances where the Business may wish to disclose or is compelled to disclose your personal data to third parties. These scenarios include disclosure to:
- 16.1** our **suppliers** and **service providers** to facilitate the provision of the Services, including couriers, translators, IT consultants and legalisation and other handling agents, web-hosting providers, identity verification partners (in order to verify your identity against public databases), consultants, for example, in order to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
 - 16.2** **public authorities** to carry out acts which are necessary in connection with the Services, such as the Foreign Office;
 - 16.3** **foreign organisations** to carry out acts which are necessary in connection with the Services, such as Embassies, Consulates, the Foreign, Commonwealth & Development Office and High Commissions;
 - 16.4** **professional organisations** exercising certain public, governance and archiving functions in relation to the notaries profession, such as Chambers of Commerce, The Notaries Society and the Faculty Office;
 - 16.5** **successor or partner legal entities**, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event relating to a Business. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
 - 16.6** **public authorities** where we are required by law to do so; and
 - 16.7** **any other third party** where you have provided your consent.

International transfer of your personal data

- 17.** We may transfer your personal data to a third party in countries outside the country in which it was originally collected for further processing in accordance with the purposes set out above. In particular, your personal data may be transferred to foreign organisations such as foreign Embassies located in the UK or abroad. Such organisations will process personal data in accordance with the laws to which they are subject and international treaties over which the Business has no control.

Tom Ginot Notary Public
is the trading name of Art Notarial Services Limited
Registered in England and Wales with Company No. 15559305
VAT Registration Number: 481 474278
37-41 Bedford Row, London, WC1R 4JH
Tel: +44 (0) 77 636 90 626
Email: tom@tomginotary.co.uk
www.tomginotary.co.uk

Regulated through the Faculty Office of the Archbishop of Canterbury.

18. If the Business transfers personal data to private organisations abroad, such as subcontractors, it will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. You may contact us for a copy of such safeguards in these circumstances.

Retention of personal data

19. Your personal data will be retained for as long as is reasonably necessary for the purposes listed above or as required by the law. For example, the Notaries Practice Rules require that notarial acts in the public form shall be preserved permanently. Records of acts not in public form shall be preserved for a minimum period of 12 years. For our non-reserved legal services (including corporate legal services), we retain your personal data for a minimum of six years from the completion of the relevant matter. Records obtained for client due diligence under anti-money laundering legislation are retained for at least five years from the end of our business relationship with you or the completion of the relevant matter. Please contact us for further details of applicable retention periods. Personal data may for reasons of security and convenience be stored on remote data facilities but in an encrypted form.

Security of personal data

20. The Business will implement technical and organisational security measures in order to prevent unauthorised access to your personal data.
21. However, please be aware that the transmission of information via the internet is never completely secure. Whilst we can do our best to keep our own systems secure, we do not have full control over all processes involved in, for example, your use of our website or sending confidential materials to us via email, and we cannot therefore guarantee the security of your information transmitted to us on the web.

Data subject rights

22. Data subjects have numerous rights in relation to their personal data. For further information about your data protection rights please visit the ICO website.
- 22.1 **Right to make a subject access request (SAR).** Data subjects may request in writing copies of their personal data. However, compliance with such requests is subject to certain limitations and exemptions and the rights of other data subjects. Each request should make clear that a SAR is being made, and we may ask you to provide proof of your identity. Subject access requests are dealt with free of charge; however, we may charge a reasonable fee, or refuse to act, where a request is manifestly unfounded or excessive, or for further copies of the same information.
- 22.2 **Right to rectification.** Data subjects may request that we rectify any inaccurate or incomplete personal data.



- 22.3 **Right to withdraw consent.** Data subjects may at any time withdraw their consent to the processing of their personal data carried out by the Business on the basis of previous consent. Such withdrawal will not affect the lawfulness of processing based on previous consent.
- 22.4 **Right to object to processing, including automated processing and profiling.** The Business does not make automated decisions. The Business may use third party due diligence platforms which provide recommendations about data subjects by automated means. We will comply with any data subject's objection to processing unless we have a compelling overriding legitimate ground for the processing, the processing is for the establishment, exercise or defence of legal claims or we have another lawful reason to refuse such request. We will comply with each valid opt-out request in relation to marketing communications.
- 22.5 **Right to erasure.** Data subjects may request that we erase their personal data. We will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding legitimate ground for keeping the personal data, such as our archiving obligations that we have to comply with.
- 22.6 **Restriction.** Data subjects may request that we restrict our processing of their personal data in various circumstances. We will comply, unless there is a lawful reason for not doing so, such as, a legal obligation to continue processing your personal data in a certain way.
- 22.7 **Right to data portability.** In certain circumstances, data subjects may request the controller to provide a copy of their personal data in a structured, commonly used and machine readable format and have it transferred to another provider of the same or similar services. To the extent such right applies to the Services, we will comply with such transfer request. Please note that a transfer to another provider does not imply erasure of the data subject's personal data which may still be required for legitimate and lawful purposes.
- 22.8 **Right to lodge a complaint with the supervisory authority.** We suggest that data subjects contact us about any questions or complaints in relation to how we process personal data. However, each data subject has the right to contact the relevant supervisory authority directly.