JACOB LAW LLP

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Online Data Deletion, Erasure and Portal Closure Policy

Client Privacy & Data Management

Important: Closing your online account or deleting online-facing data does not necessarily mean that your underlying solicitor's file will be destroyed. Certain records must or may continue to be retained for legal, regulatory and professional purposes.

1. Purpose of this Policy

Jacob Law LLP is committed to protecting the privacy, confidentiality and personal data of our clients.

Under data protection law, you may have the right to request the deletion or erasure of personal data which we hold about you. This is sometimes referred to as the "right to erasure" or the "right to be forgotten."

You may also ask us to close your online account or client portal and remove information which no longer needs to remain available through our online systems.

However, the right to erasure is not absolute. As a firm of solicitors, Jacob Law LLP is required and/or entitled to retain certain information and documents for legal, regulatory, professional, taxation, anti-money laundering, insurance and other legitimate purposes.

2. What Do We Mean by "Online Data"?

During the course of a transaction or other legal matter, we may collect, process, store and make information available through our electronic and online systems, including our client portal.

- your name, address and contact information;
- details relating to your property or legal transaction;
- documents uploaded by you or made available by us;
- correspondence and messages;
- identification, verification and anti-money laundering information;
- financial and banking information;
- transaction updates;
- information provided by third parties in connection with your legal matter; and
- other information generated during our professional relationship with you.

3. Your Right to Request Deletion

You may ask Jacob Law LLP to close or deactivate your online account, remove your access to our client portal, remove information from online-facing systems, delete personal data which we no longer need to

retain, and/or carry out a wider review of the personal information which we hold about you to determine whether it can be erased.

We will consider every request in accordance with applicable data protection legislation and our legal and professional obligations.

4. What Does Deleting Your Online Data Mean?

There is an important distinction between online availability and your underlying legal file.

Online availability means information and documents accessible through a client portal or other online-facing service. Your legal file means the underlying records maintained by Jacob Law LLP in connection with the legal services provided to you.

Where appropriate, following a deletion request, we can close or deactivate your online account and remove information from online-facing systems so that it is no longer available through the client portal. A secure copy of some or all of that information may nevertheless continue to be retained as part of your underlying legal file.

Deletion of your online account or online data does not necessarily mean deletion or destruction of your legal file.

5. Retention of Your Legal File

As solicitors, we are required to maintain appropriate records of the legal services which we provide. Accordingly, a request to delete your online information will not result in the deletion of information which Jacob Law LLP is required or entitled to retain.

Our retention periods take account of applicable legislation, limitation periods, Law Society guidance, regulatory requirements, professional indemnity insurance requirements and the nature of the particular legal matter.

For conveyancing and property matters, files may need to be retained for a substantial period following completion. Jacob Law LLP will apply the appropriate retention period having regard to the legal and professional requirements applying at the relevant time. Different or longer retention periods may apply to other categories of legal work or particular documents.

6. Circumstances Where Information May Need to Be Retained

Even where you have requested deletion, we may continue to retain information where this is necessary or appropriate.

- we have a legal or regulatory obligation to retain it;
- it forms part of the professional record of the legal services provided to you;

- it is required for taxation, accounting, financial record-keeping or anti-money laundering purposes;
- it is required for professional indemnity insurance purposes;
- litigation, a complaint or a dispute is ongoing or reasonably anticipated;
- it may be required for the establishment, exercise or defence of legal claims;
- there is an outstanding registration, undertaking or post-completion matter;
- retention is necessary to protect your interests or those of another person; or
- another lawful basis exists for its continued retention.

7. How to Request Deletion of Your Data

If you would like us to delete your online data, close your online account or consider a wider request for erasure of your personal information, you can submit a **Delete My Data Request through our client portal**.

Alternatively, you may contact Jacob Law LLP through our normal contact channels (e.g. info@jacoblaw.ie) and state clearly that you wish to make a "**Data Deletion / Erasure Request**".

- your full name;
- your email address;
- your mobile telephone number;
- your case or file reference, if known;
- the property address or legal matter concerned; and
- details of the information which you would like us to delete.

8. Identity Verification

We take the security of your personal information seriously. Before processing a deletion request, we may need to verify your identity and may ask you to provide additional information or complete an identity verification process.

This is designed to ensure that personal information is not deleted, disclosed, altered or made inaccessible at the request of someone who is not entitled to make the request.

9. What We Will Do When We Receive Your Request

Once we have received your request and, where necessary, verified your identity, we will review the personal information which we hold.

- close or deactivate your online account;
- remove your access to our client portal;
- remove information which no longer needs to remain available through our online-facing systems;
- delete personal information which we have no lawful or legitimate reason to retain;
- identify and securely retain information which must remain part of our legal, regulatory or professional records; and

- confirm the outcome of your request to you.

10. Information We Cannot Delete

There may be information which we cannot delete even though you have requested its deletion. Your request will therefore be treated as a request to delete your personal information to the extent that we are legally permitted to do so.

11. Deletion Does Not Mean Destruction of Your Legal File

For the avoidance of doubt, requesting deletion of your online account or online data does not constitute an instruction to destroy your solicitor's file and does not override our legal, regulatory or professional file-retention obligations.

The purpose of our online deletion process is to allow clients to request the removal of personal information from systems where its continued online availability is no longer necessary, while allowing Jacob Law LLP to maintain securely those legal records which we are required or entitled to retain.

12. Your Other Data Protection Rights

Depending upon the circumstances and subject to applicable legal exemptions and restrictions, you may also have rights to request access to or correction of your personal data, request restriction of processing, object to certain processing, request erasure, and make a complaint to the Data Protection Commission.

13. Contacting Us

If you have any questions about this policy or would like to request deletion of your online data, please contact Jacob Law LLP, 31–32 The Mall, Waterford, Ireland. Please mark your communication "Data Deletion / Erasure Request" and include your case reference, if known.

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SCHEDULE 1

Delete My Data - Client Request Form

Use this form to ask Jacob Law LLP to close your online account and/or delete personal information which we no longer need or are not required to retain.

IMPORTANT: Deleting your online data does not necessarily mean that your legal file will be destroyed. Information which must be retained will continue to be held securely, even though your portal access may be removed.

A. Your Details

Full Name

_____

Email Address
Please enter the email address associated with your Jacob Law LLP account.

_____

Mobile Number

_____

Case / File Reference (if known)

_____

Property Address / Legal Matter

_____

B. What Would You Like Us to Do?

Please select one or more of the following:

☐ **CLOSE MY ONLINE ACCOUNT / CLIENT PORTAL ACCESS**
I would like Jacob Law LLP to deactivate my online account so that I can no longer access the client portal.

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☐ **DELETE MY ONLINE PERSONAL DATA**
I would like Jacob Law LLP to delete personal data held in its online systems where there is no legal, regulatory, professional or other lawful reason for that information to continue to be retained.

☐ **MAKE A FULL DATA ERASURE REQUEST**
I would like Jacob Law LLP to review the personal data held about me and delete any information which it is not required or entitled to retain.

C. Additional Information

Please provide any additional information about your request below:

_____

_____

_____

D. Important Information About Your Legal File

Jacob Law LLP must maintain appropriate records of the legal services provided to its clients. This means that we may not be able to delete all information relating to you or your transaction, even where you ask us to do so.

- legal or regulatory obligations;
- professional and insurance requirements;
- anti-money laundering requirements;
- financial or taxation record-keeping;
- completing outstanding legal or registration work;
- the establishment, exercise or defence of legal claims; or
- another lawful purpose.

E. Your Confirmation

☐ I understand that requesting deletion of my online data does not necessarily result in the destruction of my underlying legal file and that Jacob Law LLP may retain information where required or permitted by law or professional obligations.

☐ I confirm that the information provided above is correct and that I am the person to whom this request relates, or I am authorised to make this request on that person's behalf.

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What Happens Next?

1. We acknowledge your request
We will record your request and acknowledge that it has been received.

2. We may verify your identity
We may need to verify your identity before taking any action.

3. We review your data
We will identify information which can be deleted and information which must continue to be retained.

4. We process your request
Where appropriate, we will close your portal account, remove online access and delete information which we no longer need or are not required or entitled to retain.

5. We confirm the outcome
We will confirm when your request has been processed and, where appropriate, explain if particular information must continue to be retained.

Jacob Law LLP

October 2026