

PRIVACY POLICY

LAST UPDATED: 9 October 2025

A. WHO ARE WE?

The websites at cms.law and cms-lawnow.com and CMS online tools (our “Websites”) are owned and operated by CMS Legal Services EEIG, for the benefit of all CMS Member Firms and their connected businesses (the “CMS Offices”).

CMS Legal Services EEIG is a controller of Personal Information (as defined below) collected on the Websites. Where CMS Legal Services EEIG shares Personal Information with the CMS Offices, the CMS Offices are also controllers. Please see [here](#) for more information on how CMS Legal Services EEIG shares Personal Information collected on the Websites with the CMS Offices.

CMS Legal Services EEIG is a European Economic Interest Grouping that coordinates CMS Member Firms. It has its head office at: Neue Mainzer Straße 2–4, 60311 Frankfurt, Germany. The contact email address for CMS EEIG is: dpo@cmslegal.com. Its contact telephone number is: +49 69 717 010, its Ust-ID is: DE 257 695 176 and it is registered on Handelsregister A in Frankfurt am Main with the registration number: HRA 44853.

CMS Legal Services EEIG provides no client services. Such services are solely provided by CMS Offices in their respective jurisdictions.

CMS provides client services in Poland through offices in Poznan and Warsaw operated by CMS Cameron McKenna Nabarro Olswang Pońskiak i Bejm sp.k. (“**CMS Poland**”) With its registered office in Warsaw (address: Varso Tower, Chmielna 69, 00-801 Warsaw, Poland), entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Division of the National Court Register, under KRS no. 107234, having tax identification number (NIP): 525-21-85-154 and REGON: 016394021. CMS Poland is the administrator of Personal Data (as defined below) collected in the course of providing legal and/or marketing services.

In this Privacy Policy, references to “we”, “us”, or “our” mean CMS Legal Services EEIG, CMS Offices and/or CMS Poland. References to “you” refer to entities whose Personal Data (as defined below) is processed, such as users of our Websites and/or recipients of marketing communications provided by us.

In this Privacy Policy “**Personal Data**” is information relating to you, which can be used to personally identify you (either directly or indirectly).

B. APPLICATION OF THE PRIVACY POLICY

This Privacy Policy:

- describes how we collect, use and otherwise deal with Personal Data that you provide or make available to us, or that we collect from you, when you use our Websites, or when you choose to receive marketing communications from us;

- explains the circumstances in which we may transfer this to others; and
- explains about the rights that you have in relation to this Personal Data.

Our Privacy Policy must be read together with any other legal notices or terms and conditions provided or made available to you on other pages of our Websites.

C. HOW, WHEN AND WHY DO WE COLLECT AND USE PERSONAL INFORMATION?

1. Personal Information that we collect

The types of information we may collect from you, depending on how you use our Websites or when you choose to receive marketing communications from us, are as follows:

- a. your name;
- b. your email address;
- c. your address (business and personal);
- d. your landline and mobile telephone numbers (business and personal);
- e. any information that you choose to provide to us when filling out a contact form on our Websites;
- f. your opinions, when you choose to complete one of our surveys;
- g. your IP address, login details for Law-Now and or RegZone and other technical information which tells us about how you use our Websites;
- h. your geographic location (country/territory where you are living and/or working);
- i. your job title, role and the name of your employer;
- j. the industry sector in which you work;
- k. the country or countries, industry sector(s) and area(s) of law in respect of which you wish to receive Law-Now/RegZone communications and other marketing communications (where you have registered on the Law-Now/RegZone subscription portals or wished to receive marketing communications in other ways).

2. How we use your Personal Information

Contact Forms - we may collect your Personal Information, which you choose to provide when you fill in forms on our Websites, including the information set out in a.-e. above. We may use this Personal Information to respond to your queries, and/or provide the services and/or information that you have requested.

Marketing communications - if you choose to subscribe to the Law-Now and/or RegZone portal(s) and/or opt-in to receive marketing communications from us, tailored to your preferences as expressed through the relevant forms, we use Personal Information that you provide during the subscription process to set-up and maintain your Law-Now/RegZone account and to send you relevant Law-Now/RegZone content by email. This will consist of information on legal and business issues that are relevant to your preferences. We will also tell you about our events and seminars. We will also keep you informed about events and seminars organised by us, which may be of interest to you because of the topic of the meeting. Within RegZone, you have the option to receive invitations to our events. If you want to receive such invitations, you can let us know by ticking the relevant box on the subscription form.

Your agreement to the use of your Personal Information for these purposes is optional. If you decide not to subscribe to Law-Now, RegZone and/or receiving other marketing communication, we will not send you Law-Now, RegZone and/or other marketing communications, but your use of our Websites will remain otherwise unaffected. You can change your Law-Now/Regzone preferences at any time by logging into your account.

Marketing communications opt-out - you are entitled to opt-out from receipt of Law-Now, RegZone and/or other marketing communications at any time. You can do so by visiting the relevant preference management pages and deselecting all email options. You can also use the “unsubscribe” option included in [Law-Now/RegZone](#)/other marketing communication e-mails. Alternatively, you can email us and we will process “unsubscribe” requests for you. When you unsubscribe, we will keep a record of this, and once your request has been processed, you will stop receiving marketing communication emails. You can still use our Websites once you have unsubscribed.

Surveys – we may ask you if you would like to provide us with feedback on our services and/or events by completing a survey. This is optional. We use feedback from surveys to evaluate our performance and to help improve our future services and/or events.

Events – if you wish to attend one of our events and/or seminars that may suit your interests, we ask you to complete a registration form. The registration form contains a further explanation of how we process your Personal Data in connection with the event.

Newsletters and publications – we will only send you publications or newsletters if they are tailored to your preferences for a particular type of information or legal area that you have indicated to us in the relevant form. We also process your Personal Data to provide you with tailored, relevant marketing materials, news and invitations tailored to your interests, including information on how you can access and use our email addresses (see section D.1 for more information).

Our Business Purposes - we may also use your Personal Information for our business purposes as follows:

- to manage our business;
- to communicate with you;
- to enable corporate transactions to take place;
- for record keeping, statistical analysis, internal reporting and research purposes;
- to ensure network and information security;
- to notify you about changes to our services;
- to investigate any complaint you make;
- to provide evidence in any dispute or anticipated dispute between you and us;
- to analyse how our Websites are being used;
- to customise various aspects of our Websites to improve your experience;
- to host, maintain and otherwise support the operation of our Websites;
- for the detection and prevention of fraud and other criminal offences;
- for risk management purposes;
- for business and disaster recovery (e.g. to create back-ups);
- for document retention/storage purposes;

- for database management purposes;
- to protect the rights, property, and/or safety of CMS, its personnel and others; and
- to ensure the quality of the services we provide to our users.

In addition, we may use your Personal Information for further specific purposes made clear at the point of collection on particular pages of our Websites.

If you choose not to provide Personal Information requested by us, we may not be able to provide you with the information and/or services you have requested or otherwise fulfil the purpose(s) for which we have asked for the Personal Information. Aside from this, your visit to our Websites will remain unaffected.

3. Legal grounds for collection and use of Personal Information

We ask you to consent to the processing of your Personal Data in connection with the offering of Law-Now and RegZone, and marketing communications, where this is required by national law.

In other cases, we process your Personal Data when necessary:

- to comply with our legal and regulatory obligations;
- for our legitimate interests in:
 - responding to your queries;
 - providing services and/or (marketing) information based on the user's subject preferences indicated to us;
 - organising events;
 - carrying out surveys in order to obtain feedback on our services and/or events;
 - our internal business purposes, as set out in 2. above.

You can object to processing based on our legitimate interests at any time by contacting us [here](#).

See also "[Your Rights – The right to object](#)" below.

We consider your rights in relation to the processing of your Personal Data and ensure that the processing of your Personal Data based on our legitimate interests is not excessive or too intrusive. We have also implemented the protection of your rights by providing appropriate retention periods and security controls.

If you would like to find out more about the legal grounds on which we process your Personal Information for a particular purpose you can contact us [here](#).

4. Cookies

Where you use our Websites, we will process your Personal Information collected by using cookies in accordance with our Cookie Notice. Please click [here](#) to view our Cookie Notice.

5. Analytics

We are using Piwik PRO for basic application and user statistics. Piwik PRO does not place any cookie, does not transfers any Personal Data to third parties or outside the European Economic Area ("EEA") and does not track any Personal Data. Your visitor IP address is only retrieved on country level.

6. Information from other sources

Where permissible under applicable local laws, we may combine information that you have provided to us with other information that we already hold about you and which we have collected for a compatible purpose.

D. HOW AND WHEN DO WE SHARE INFORMATION WITH THIRD PARTIES?

Some of the functionality on our Websites and online services involves us cooperating, and sharing your Personal Information with, third parties. We have carefully selected these third parties and taken steps to ensure that when we share your Personal Information with them, it is adequately protected. Details about how we process Personal Information on our Websites in conjunction with third parties is set out below:

1. Online marketing- Concep mailer and GoToMeeting

Concep mailer

In order to provide you with tailored marketing, publications and information about our services, and invitation to events, we are using "Concep mailer" provided by Concep Group Ltd, London, United Kingdom. Concep Group is bound by a processing agreement with CMS. All user information, contact information and analytics are hosted by Concep Group on Amazon servers in the EEA and can be shared with local CMS systems.

Concep allows us to verify effectiveness, email deliverability, opt outs, clicks on links and downloads of stored materials in order to optimise our mailing campaigns. If you do not like emails and their use to be tracked any longer, please let us know via dpo@cmslegal.com . Where possible we are anonymising IP addresses. Concep Group encrypts emails during transmission.

GoToMeeting (webinars)

GoToMeeting is a serviced webinar platform, which is provided by Logmein Corp and services in Europe by LogMeIn Ireland Ltd, Dublin, Ireland. Content and any personal data are processed for providing the webinar service. LogMeIn is bound by a data processing agreement with CMS, which satisfies the EU Standard Contractual Clauses. We are using your personal data to track registration, participation and the quality of the webinars. To protect communications, your data is end-to-end encrypted while it's being transferred between your device and the servers of GoToMeeting. Details of technical security can be found on LogMeIn ["Trust and security center"](#).

ON24 (webinars)

ON24 is a webinar platform which is provided by ON24 Inc. Personal data are processed for providing the webinar service. ON24 Inc is bound by a data processing agreement which satisfies the EU Standard Contractual Clauses. We use your personal data to track registration, participation and any feedback on the webinars. Details of how the ON24 platform uses your personal data can be found in the ON24 Platform Privacy Policy [here](#).

2. Google Tag Manager, Freespee and Ceros

Google Tag Manager

Google Tag Manager is a tag management system provided by Google that we use on our Websites. The Google Tag Manager allows us to add code and other snippets such as pixels to our Websites . Google is only processing your IP address as a processor and according to the EU Standard Contractual Clauses.

Freespee

Freespee, a service provided by Freespee AB, works with Google Tag Manager and uses [Cookies](#) (and similar technologies), to track and analyse user behaviour on Websites.

Where a telephone call is triggered through our Websites by the user clicking on the telephone icon, Freespee collects the following information about the user making the call: telephone number, IP address or other device address or ID, geographic location of the user, web browser and/or device type, the web pages or sites visited just before or just after visiting our Websites, the pages or other content the user views or interacts with, and the dates and times of the user's visit. Freespee then shares this information with us.

We use feedback provided to us by Freespee to help us analyse the effectiveness of our marketing campaigns, including by checking if a user who clicks on the telephone icon actually places a call to the lawyer whose number he/she has clicked on. For more information about how Freespee processes Personal Information, please view the Freespee Privacy Notice at:
<https://www.freespee.com/privacy-policy/> .

Ceros

Ceros studio is a service provided by Ceros Crowd Fusion, Ltd. to publish website content in a magazine style and to allow website customised user experience; for that purpose, the system tracks user IPs. Ceros is only processing your IP address as a processor and according to the EU Standard Contractual Clauses.

Cookies may be used to enable our analytics dashboard so that we can see how our web audience is engaging with content. If so, this is all aggregated and at no point will we see analytics on individual IP address level. To make the service fully work and help us with analytics, you need to allow for analytics cookies in your "[cookies preference settings](#) ".

3. Sharing within CMS and to service providers

CMS Legal Services EEIG and/or CMS Poland shares your Personal Information with CMS Offices:

- if you ask us to do so in an online form;
- if you tick the relevant box (e.g. on Law-Now or RegZone websites), in order to receive information about services and events provided by CMS Offices;
- if you choose to receive marketing communications from us tailored to your preferences or;
- where we need to do so in order to provide the services or information that you have requested or to organise and/or manage an event that you have registered to attend.

When a CMS Office would like to use your Personal Information for a new purpose, they will let you know about this first.

We also share your Personal Information with our third-party service providers based in- and outside of the EEA (see Section E "International Transfers"), who act on our behalf to:

- provide support services in relation to our Websites for the purposes of: hosting and maintaining our Websites; providing data storage; assisting us with database management, and in order to assist us with related tasks or processes (including sending marketing communications);
- send out our surveys and record and process the results; and
- manage the invitation and registration process for our events.

All of our service providers are bound by written contract to process Personal Data provided to them only for the purpose of providing the specific service to us and to maintain appropriate security measures to protect your Personal Information.

4. Sharing with other third parties

We share your Personal Information with:

- our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- any other third party if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation;
- any other third party for the purposes of acting in accordance with the requirements of a court, tribunal, regulator or government agency, for example, complying with a search warrant or court order; or
- investors and other relevant third parties in the event of an actual potential sale or other corporate transaction related to CMS.

Our Websites provide sharing buttons that you can click on in order to share content from our Websites on social media channels. We do not use these buttons to share your Personal Information with social media providers. When you click on a sharing button the relevant social media provider will gather Personal Information directly from you. Please read the privacy policy of any social media provider with which you intend to share content before clicking on the corresponding sharing button.

E. INTERNATIONAL TRANSFERS

The transfer of your Personal Data to and between CMS Firms as described in this Privacy Policy, may involve your Personal Data being sent outside of the EEA, to locations that may not provide the same level of protection as those where you first provided the information.

However, we will only transfer your Personal Data outside of the EEA:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Data; or
- where we have put in place appropriate safeguards to ensure that your Personal Data is protected (for example where both parties involved in the transfer have signed Standard Data Protection Clauses adopted by the European Commission); or

- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

Full details of the locations of the CMS Offices are listed [here](#).

You can request further detail about the safeguards that we have in place in respect of transfers of Personal Data outside of the EEA and where applicable a copy of the standard data protection clauses that we have in place, by contacting us [here](#).

F. HOW LONG DO WE STORE PERSONAL INFORMATION?

It is our policy to retain your Personal Data for the length of time required for the specific purpose or purposes for which it was collected. However, we may be obliged to store some Personal Information for a longer period of time, taking into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes and
- guidelines issued by relevant data protection authorities.

Whilst we continue to process your Personal Data, we will ensure that it is treated in accordance with this Privacy Policy. Otherwise, we securely erase your information once this is no longer needed.

If you would like to find out how long we keep your Personal Data for a particular purpose you can contact us [here](#).

For more information on how long cookies are stored, please refer to our [Cookie Notice](#).

G. SECURITY

Our Websites are hosted on servers in the EEA. We employ appropriate security measures to help protect your Personal Information and guard against access by unauthorised persons. Information storage is on secure computers in a locked and certified information centre and information is encrypted wherever possible. We undergo periodic reviews of our security policies and procedures to ensure that our systems are secure and protected. However, as the transmission of information via the Internet is not completely secure we cannot guarantee the security of your information transmitted to our Websites.

H. CONFIDENTIALITY

We acknowledge that the information you provide may be confidential. We do not sell, rent, distribute or otherwise make Personal Data commercially available to any third party, except that we may share information with our service providers for the purposes set out in this Privacy Policy. We will maintain the confidentiality of and protect your information in accordance with CMS Privacy Policy and all applicable laws.

I. YOUR RIGHTS

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications. We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal Data and your rights. This is why we are providing you with the information in this Privacy Policy.
2. The right of access	<p>You have the right to obtain a copy of your Personal Data (if we are processing it), and certain other information (similar to that provided in this Privacy Policy) about how it is used.</p> <p>This is so you are aware and can check that we are using your information in accordance with data protection law.</p> <p>We can refuse to provide information where to do so may reveal Personal Data about another person or would otherwise negatively impact another person's rights.</p>
3. The right to rectification	You can ask us to take reasonable measures to correct your Personal Data if it is inaccurate or incomplete. E.g. if we have a wrong name or address of you.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your Personal Data where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use your Personal Information in defence of a legal claim.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your Personal Information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your Personal Information, but may not use it further. We keep lists of people who have asked for further use of their Personal Information to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse certain Personal Data for your own purposes across different organisations.
7. The right to object	You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by us or by a third party. We will be allowed to continue to process your Personal Information if we can demonstrate " <i>compelling legitimate grounds for the processing which override your interests, rights and freedoms</i> " or we need this for the establishment, exercise or defence of legal claims.

Nothing in this Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

J. HOW TO CONTACT US

If you wish to request further information or exercise any of the above rights, or if you are unhappy with how we have handled your Personal Information, contact us here: cmspolandgdpr@cms-cmno.com. Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless:

- you request additional copies of your Personal Information undergoing processing, in which case we may charge for our reasonable administrative costs, or
- you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.

If you are not satisfied with our response to your complaint or believe our processing of your Personal Information does not comply with data protection law, you can make a complaint to the relevant EEA data protection authority where you are located. The contact details for each EEA data protection authority can be found here: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm. For CMS Poland, the competent data protection authority is the President of the Office for the Protection of Personal Data based in Warsaw (address: ul. Stawki 2, 00-193 Warsaw).

K. CHANGES TO THIS PRIVACY POLICY

We may make minor changes to our Privacy Policy. When we make these changes we will publish the updated Policy on our Websites. If we make any significant changes, we will take additional steps to inform you of these.