

**CITY OF LONDON LAW SOCIETY DATA LAW COMMITTEE  
(THE "COMMITTEE")**

Date:	27 November 2025
Location:	The offices of Hebert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London, EC2A 2EG
Present:	Jon Bartley, RPC (the "Chair") Cynthia O'Donoghue, Reed Smith LLP Emma Burnett, CMS LLP Eve-Christie Vermynck, King & Spalding LLP Giles Pratt, Freshfields Bruckhaus Deringer LLP Jade Kowalski, DAC Beachcroft LLP Kevin Hart, City of London Law Society Luke Dixon, Freeths LLP Miriam Everett, Herbert Smith Freehills Kramer LLP Oliver Yaros, Mayer Brown International LLP Rebecca Cousin, Slaughter and May Rhiannon Webster, Ashurst LLP
In attendance:	Isabel Rigby (Associate, Herbert Smith Freehills Kramer LLP): as guest minute taker

**1. Welcome**

The Chair welcomed all those in attendance at the meeting of the Committee.

**2. Apologies**

Ross McKean, DLA Piper (UK) LLP.

**3. Minutes from last meeting**

Draft minutes from the previous meeting circulated were noted. The Chair confirmed review and requested any further comments promptly. Subject to this, approved minutes will be uploaded to the CLLS website.

**4. Update on CLLS**

Kevin Hart reported on a successful meeting of specialist committee chairs, highlighting strong attendance and positive feedback. Key points:

- Intention to integrate an AI programme into future workstreams.
- Continued efforts to influence policy during consultation stages.
- Effective collaboration between the board and committees.
- The new CEO is expected to attend early next year.
- Ministry of Justice seeking dates for English law online representation from each committee.

**5. Developments**

*Digital Omnibus*

The Committee discussed the recently published Digital Omnibus package, noting the objective to rationalise and streamline digital legislation. The Committee discussed the differences between the previous and current draft, including with respect to special category data provisions.

An accelerated timeline is anticipated, with adoption expected in Spring 2026. The Committee discussed the challenges faced by many clients considering whether or not to continue high-risk AI preparation given current uncertainties.

The Committee also discussed the differences between the UK approach to reform of the GDPR and the Commission's proposals in the Omnibus Package. The concerns raised by the EDPB with respect to the UK reforms were noted in the context of the EU proposals. It was noted that guidance will be critical before provisions become effective.

### *DSARs*

The Committee considered developments relating to DSARs, including increasing client pushback, ICO case closures and delays, and expanding FCA inquiries, particularly in relation to money laundering regulations. The rise in AI-generated DSARs was noted, and the ICO's complaints session highlighted the complexity of AI issues. In addition, the proposed amendments to DSAR process in the Omnibus package were noted and discussed as to the extent of impact these may have on UK practices.

### *DSIT/ICO cookie consultations*

On cookies, the Committee discussed the interpretation of the potential analytics exemption, which remains narrow. It was noted that DSIT may be considering expansion of the exemption to include aggregated analytics.

### *AI*

The Committee received an update on AI developments, including the recent AI Committee meeting. Work is underway to draft guidance for law firms on AI use aligned with SRA principles, with considerations for engagement letters and privilege. UK AI legislation is unlikely in the short term, and the focus will remain on transparency and risk mitigation. Plans for a CLLS symposium on generative AI with SRA involvement were noted, as well as the launch of DSIT's AI Growth Lab consultation.

### *Cybersecurity and Resilience Bill*

The Cybersecurity & Resilience Bill was discussed. It is currently sector-specific but expected to impact client contracting practices. The EU Cyber Resilience Act deadlines and associated administrative burdens were also considered.

## **6. Consultations**

The Committee noted consultations currently open, including the EU omnibus package (open until January), the ICO consultation on enforcement procedural guidance (no major concerns), and the EDPB templates survey, which provides an opportunity to request additional templates such as DPIA and LIA.

In respect of the EU omnibus package, the Committee agreed that it would be worthwhile contributing to a European-led response via an equivalent body in Europe.

## **7. AOB**

### *Data Act*

The Committee discussed ongoing work to draft contractual terms for cloud service providers. A benchmarking session was recently held in MedTech Europe.

### *CSP*

An expert committee has developed input on contractual provisions, which have now been published as part of the Digital Omnibus package. These provisions aim to address all relevant requirements, although the underlying model processes remain largely unchanged from the previous expert meeting.

The next Committee meeting is scheduled for **Thursday 5<sup>th</sup> February 2026** (at King & Spalding).