



## PRIVACY LEGAL NETWORK

### MEMBERSHIP AND PARTICIPATION REGULATION

(“Regulation”)

#### Preamble

This Regulation governs the conditions for joining and participating in the Privacy Legal Network (“PLN” or the “Network”), an international alliance of independent law firms specialized in privacy and data protection law (each, a “Member”). The Network is designed as a knowledge-sharing and trusted referral platform among leading firms operating in this legal field, on a one-firm-per-jurisdiction basis and enabling mutual referrals and cross-border collaboration.

#### 1. Purpose and scope

- 1.1. This Regulation defines the admission criteria, rights and obligations of member firms, and the internal governance framework of the PLN.
- 1.2. It applies to all current Members of the Network, and to any new Member that may join in the future. By joining the Network, each Member agrees to the rules set out in this Regulation.

#### 2. Nature of the Network

- 2.1. PLN is a collaborative initiative among law experts in different jurisdictions with demonstrated experience and reputation in privacy, data protection, and related regulatory matters.
- 2.2. Each jurisdiction may be represented by only one member firm, selected on the basis of merit and alignment with the Network's values.
- 2.3. The Network does not operate as a legal entity, but as a platform for voluntary cooperation. The Network does not constitute, nor should it be construed as, a joint venture or partnership, and each Member will continue to operate independently.
- 2.4. PLN is non-commercial in nature and does not provide for any financial arrangements among members, including membership fees, rebates, or introduction commissions.

#### 3. Admission of Members

- 3.1. A firm’s admission to the PLN may occur (i) by submitting a written request through the contact form on the Network’s website, or (ii) upon presentation by a Member of a law firm operating in a jurisdiction not yet covered by the Network.
- 3.2. During the initial launch phase, and in any event until 31 December 2026, admission requests are received and processed by LEXIA, which will also provide the initial infrastructure and

coordination support. From 1 January 2027, admission requests will be evaluated by all Members. Upon receipt of an application to join, or a nomination of a law firm by a Member, LEXIA will notify all Members of the application and circulate all relevant information available regarding the prospective member. The Members will assess the application and inform LEXIA of the outcome – indicating approval or rejection – within 15 days of LEXIA’s notice. The decision will be adopted by a majority of the participating Members. If no response is received within the above time frame, consent will be deemed to have been given.

- 3.3. Membership is free of charge.
- 3.4. No rebates, commissions, or introduction fees are paid or received among members in relation to the presentation of new joining firms.
- 3.5. Admission is based on objective merit criteria, including proven expertise, market reputation, independence, and a significant track record in privacy and data protection law.
- 3.6. Participation in PLN is non-exclusive. Member firms remain free to participate in other professional networks or alliances, provided that such participation does not conflict with these Regulations or the Network’s values.

#### **4. Rights and Obligations of Members**

- 4.1. Each member has the right to:
  - (i) be listed on the PLN website with its logo and firm profile;
  - (ii) participate in PLN meetings and initiatives;
  - (iii) receive referrals from other members;
  - (iv) propose collaborative projects and joint initiatives.
- 4.2. Each member undertakes to:
  - (i) participate actively in the Network’s activities, including 4 annual meetings (3 online and 1 in-person, hosted on a rotating basis by each Member);
  - (ii) handle referrals in good faith and with professional diligence;
  - (iii) maintain confidentiality regarding client and peer information;
  - (iv) contribute to the development of shared materials and best practices;
  - (v) respect the Network's visual identity and shared communication materials;
  - (vi) contribute to knowledge-sharing and thought leadership (including, by way of example, joint publications, webinars, events, training, and the preparation of shared best practices);
  - (vii) provide mutual support on cross-border matters, including timely and professional handling of referrals, in compliance with applicable professional and ethical rules; and
  - (viii) participate in the collective management of the Network after the initial phase, in accordance with Article 8.

#### **5. Communication and branding**

- 5.1. PLN maintains a dedicated website, a LinkedIn page, a dedicated mailbox, and a shared logo and visual identity.
- 5.2. The website includes a public list of member firms and a contact form for inquiries.
- 5.3. Members may be featured on the Network's website and LinkedIn page, subject to their consent.

## **6. Withdrawal from the Network**

- 6.1. Each Member may withdraw from the PLN at any time by giving the other Members a written notice 30 (thirty) days prior to the effective date.
- 6.2. From the effective date of withdrawal: (i) the rights to participate in Network initiatives and to receive referrals cease; (ii) the withdrawing Member's logo and visual identity will be immediately removed from the website or LinkedIn page.
- 6.3. A former Member may submit a new application for admission in accordance with the procedures set out in Article 3, subject to review by the Members against the applicable merit-based criteria.
- 6.4. If the designated representative or contact person of a Member firm ceases to be part of that firm, such individual shall use reasonable efforts, in good faith and with professional diligence, to facilitate an orderly handover of responsibilities, information, and communication channels to the new representative designated by the Member, including the timely transfer of ongoing Network-related matters and the prompt update of contact details.

## **7. Revocation of a Member for inactivity**

- 7.1. A Member in the PLN may be revoked for (i) lack of active participation in the Network's initiatives or (ii) failure, without prior notice, to attend at least three meetings.
- 7.2. Before any revocation decision, the PLN will send a written notice inviting the Member to confirm whether it intends to continue participating in the Network.
- 7.3. Should the Member choose to withdraw from the PLN, Article 6 shall apply. If the Member does not respond within 15 (fifteen) days of the notice, the PLN may decide to revoke the Member's membership. Paragraph 6.2 shall apply accordingly.

## **8. Data protection and confidentiality**

- 8.1. The personal data processed in the context of PLN include:
  - (i) data relating to law firms (and their contact persons) for membership and Network administration purposes; and
  - (ii) data of individuals or clients seeking assistance, which may be shared between members strictly for referral or follow-up purposes.
- 8.2. The data controller for data collected via the website and dedicated mailbox is the firm managing the infrastructure (initially LEXIA).
- 8.3. When a request is forwarded to a member firm for follow-up, that firm becomes an independent data controller for the relevant data.

- 8.4. The Network will progressively move toward a shared governance model, including with regard to data controllership, in full compliance with GDPR and other applicable regulations.
- 8.5. Members must maintain strict confidentiality over all information shared within PLN, including client information and peer-to-peer exchanges, and must adopt appropriate technical and organizational measures to protect such information, without prejudice to mandatory professional secrecy and applicable ethical rules.

## **9. Amendments and future governance**

- 9.1. This Regulation may be updated upon agreement by a majority of the member firms, following consultation. During the initial phase, LEXIA will coordinate the consultation process and the publication of updates.
- 9.2. As PLN evolves, a governance group composed of member representatives may be established to oversee admissions, initiatives, infrastructure, communications, and strategic decisions, and to coordinate the collective management of the Network after the initial phase, including data governance as described in Article 8.

*February 2026*