

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
MEDIA AND COMMUNICATIONS LIST**

**Claim No.: KB-2025-001120**

**BETWEEN:**

**GOOD LAW PROJECT LIMITED**

**Claimant/  
Respondent**

**-and-**

**REFORM UK PARTY LIMITED**

**Defendant/  
Applicant**

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**SECOND WITNESS STATEMENT OF  
DUNCAN MCCANN**

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I, **DUNCAN MCCANN**, of Good Law Project Limited, 5<sup>th</sup> Floor, 167-169 Great Portland Street, London, W1W 5PF, **WILL SAY** as follows:

**A. INTRODUCTION**

1. I am the Head of Technology and Data at Good Law Project Limited (the “**Claimant**” or “**Good Law Project**”) and am duly authorised by the Claimant to make this statement in relation to the application issued by the Defendant in these proceedings (the “**Proceedings**”) on 30 June 2025 for strike out of the Claimant’s claim pursuant to CPR r.3.4, or alternatively summary judgment under CPR r.24.2 (the “**Application**”).
2. In this witness statement, I make a correction to my First Witness Statement dated 10 October 2025 (“**McCann 1**”).
3. The facts and matters contained in this witness statement are based upon my own knowledge and are true.
4. This witness statement was prepared following discussions over email and telephone with Good Law Project’s solicitors, Pallas Partners LLP, during the course of these Proceedings.

Nothing in this witness statement is intended to constitute a waiver of privilege by the Claimant in respect of any documents or communications.

**B. CORRECTION**

5. A correction needs to be made to paragraphs 20 and 21 of McCann 1, which stated that between 5 June 2024 and 4 July 2024, almost 20,000 individuals/data subjects took part in the Political Parties Campaign (as defined at paragraph 17 of McCann 1). The figure of “almost 20,000” is incorrect and I apologise for this error. The correct position is that almost 16,000 individual requests were submitted as part of the Political Parties Campaign and these were generated by over 11,600 individuals/data subjects, as some of the individuals chose to submit requests to more than one political party. The source of the original error remains unclear. To ensure the accuracy of the corrected figures given in this statement, I have validated and verified the underlying data with the technical team responsible for maintaining and tracking the relevant metrics.
6. For convenience, a table clarifying the correction to paragraphs 20 and 21 of McCann 1 is set out at the Appendix to this witness statement.

**Statement of Truth**

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of Court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: 

Name: Duncan McCann

Position: Head of Technology and Data at Good Law Project

Date: 28 January 2026

**APPENDIX**

Para	Existing evidence	Corrected evidence
20	Almost 20,000 people took part in the campaign and each contacted at least one of the five largest UK political parties: the Conservative Party, the Labour Party, the Liberal Democrats, the Scottish National Party and the Defendant.	<del>Almost 20,000</del> Over 11,600 people took part in the campaign and each contacted at least one of the five largest UK political parties: the Conservative Party, the Labour Party, the Liberal Democrats, the Scottish National Party and the Defendant.
21	As part of this project, between 5 June 2024 and 4 July 2024, Good Law Project provided assistance to almost 20,000 data subjects to submit requests to one or more of those parties. The requests: (i) sought a copy of the personal data processed by the party pursuant to Article 15 of the UK GDPR, along with information about the processing; and (ii) requested that the party cease processing and delete the data subject's personal data, including special category data, pursuant to Articles 18 and 21 of the UK GDPR.	As part of this project, between 5 June 2024 and 4 July 2024, Good Law Project provided assistance to <del>almost 20,000</del> over 11,600 data subjects to submit <del>almost 16,000</del> requests to one or more of those parties. The requests: (i) sought a copy of the personal data processed by the party pursuant to Article 15 of the UK GDPR, along with information about the processing; and (ii) requested that the party cease processing and delete the data subject's personal data, including special category data, pursuant to Articles 18 and 21 of the UK GDPR.