

# Customer Privacy Notice

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This privacy notice describes how the Barclays companies and branches listed below (collectively "**Barclays**") each collects and processes personal data, how they use and protect this information, and individuals' rights in relation to this information.

- Barclays Bank PLC
- Barclays Bank Ireland PLC
- Barclays Bank Ireland PLC, Belgium Branch
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- Barclays Bank Ireland PLC, French Branch
- Barclays Bank Ireland PLC, Italian Branch
- Barclays Bank Ireland PLC, Luxembourg Branch
- Barclays Bank Ireland PLC, Netherlands Branch
- Barclays Bank Ireland PLC, Portuguese Branch
- Barclays Bank Ireland PLC, Spain Branch

It applies to all personal data Barclays collects about the Customer. Personal data is information, or a combination of pieces of information that could reasonably allow an individual to be identified.

## 1. **Personal data Barclays collects**

- 1.1 Barclays will collect and process certain personal data about the following individuals associated with the Customer (referred to as "**Related Parties**"):
- The Customer itself, such as where it is operating as a sole trader
  - Individual members of a partnership
  - Individual members of a co-ownership
  - Individual directors, company secretaries or other equivalent individual office holders and beneficial owners of the Customer
  - Guarantors and third-party security providers
  - Individuals with joint financial obligations with directors and beneficial owners of the Customer
  - Individuals associated with the directors and beneficial owners of the Customer's business
  - Any employees, contractors, representatives, officers or agents of the Customer
  - Legal representatives and other individuals authorised to act on behalf of the Customer

- 1.2 Barclays collects personal data directly from the Customer and Related Parties and also from other sources including those described below:
- Barclays will check its own records for information about (i) any accounts belonging to the Customer or any associated businesses and (ii) the Customer's shareholders who are beneficial owners of the businesses
  - Barclays may carry out searches using credit reference agencies and financial crime prevention agencies for information relating to the Customer's business and Related Parties
  - Barclays may search publically available sources, such as media stories, for information relating to the Customer's business and Related Parties.
- 1.3 The categories of information that Barclays collects about the Customer and Related Parties include:
- Personal details (e.g. name, date of birth, passport information, identification information, biographical information, information about personal interests)
  - Contact details (e.g. phone number, email address, postal address, mobile number)
  - Customer-related details (e.g. relationship with the Customer or Related Parties, business information, information about any shareholdings, business contact details)
  - Transactional details (e.g. information about services, requests, queries or complaints)
  - Financial details (e.g. information about business accounts, financial history, information from credit reference agencies and fraud prevention agencies)
- 1.4 Some of the information that Barclays collects are special categories of personal data (also known as sensitive personal data). For example, the Customer due diligence checks Barclays carries out may reveal political opinions or information about criminal convictions or offences about Customers and Related Parties. In addition, if incorrect information is provided or fraud is suspected, Barclays will record this. Barclays may also pass this information to financial crime prevention agencies where it may be accessed by law enforcement agencies globally. Where Barclays processes such sensitive personal data, it will usually do so, on the basis that it is necessary for reasons of substantial public interest or to establish, exercise or defend any legal claims. In any case, Barclays will carry out the processing in accordance with applicable laws.
- 1.5 Barclays may be required by law to collect certain personal data, or as a consequence of its contractual relationship with its Customers. Failure to provide this information may prevent or delay the fulfilment of these obligations.

2. **What Barclays uses personal data for and on what basis**

- 2.1 Barclays must have a legal basis to process Customer and Related Parties' personal data. The table below sets-out the purposes for which Barclays uses personal data about Customers and Related Parties, and its legal basis for doing so. Where Barclays is relying on a legitimate interest, these are also set-out below:

What Barclays uses personal data for	The legal basis for doing so
Customer administration and management, including relationship	<input type="checkbox"/> Where the law requires this <input type="checkbox"/> Where it is necessary for the performance of a contract with a sole

management, and for account administration and management purposes	trader, partnership or co-ownership Customer <input type="checkbox"/> Where it is in Barclays' legitimate interests to ensure that its Customer accounts are well-managed, so that its Customers are provided with a high standard of service, to protect its business interests and the interests of its Customers
Transaction processing, monitoring and analysis activities to develop and manage Barclays' products and services	<input type="checkbox"/> Where the law requires this <input type="checkbox"/> Where it is necessary for the performance of a contract with a sole trader, partnership or co-ownership Customer <input type="checkbox"/> Where it is in Barclays' legitimate interests to develop, build, implement and run business models and systems which protect its business interests and provide its Customers with a high standard of service
Undertaking Customer due diligence checks for the prevention and detection of financial and other crimes and undertaking checks, including on Related Parties, in relation to identity verification, application checks, anti-money laundering, compliance and risk screening	<input type="checkbox"/> Where the law requires this <input type="checkbox"/> Where it is in Barclays' legitimate interests to prevent and investigate fraud, money laundering and other crimes and to verify the Customer's identity in order to protect its business and to comply with laws that apply to it
Communicating with the Customer and Related Parties from time to time about products, services, events offered by Barclays and/or other members of the Barclays Group, and other communications such as research and insights, that may be of interest to the Customer and Related Parties. (See paragraph below on how to stop receiving communications of this nature)	<input type="checkbox"/> Where it is in Barclays' legitimate interests to provide information about its business and services that it considers would benefit or inform its Customers.
Complying with legal obligations to which it is subject and co-operating with regulators and law enforcement bodies	<input type="checkbox"/> Where the law requires this
Exercising its legal rights where it is necessary to do so, for example to protect Barclays against harm to its rights and property interests, to detect, prevent and respond to fraud or other violations of law, for legal and dispute management purposes, and for debt collection and recoveries purposes	<input type="checkbox"/> Where the law requires this <input type="checkbox"/> Where it is in Barclays' legitimate interests to prevent and investigate fraud, money laundering and other crimes and to verify the Customer's identity in order to protect its business and to comply with laws that apply to it

- 2.2 Recipients of any marketing communications may tell Barclays at any time if they wish to change their contact preferences for this purpose.
- 2.3 When Barclays processes Customer and Related Parties' personal data to meet its legitimate interests, it puts in place robust safeguards to ensure that the Customer and Related Parties' privacy is protected and to ensure that its legitimate interests do not override the Customer and Related Parties' interests or fundamental rights and freedoms.
- 2.4 Barclays may contact the Customer's guarantors and security providers in connection with any products and services provided to the Customer by Barclays.
- 2.5 Where Barclays processes any information about Customers and Related Parties that is not personal data, Barclays will comply with its obligations of confidentiality and establish and maintain adequate security measures to safeguard confidential information from unauthorised access or use.

### 3. **Individuals' rights over their personal data**

Individuals have certain rights regarding their personal data, subject to local law. These include the following rights to:

- access their personal data (including receiving this as an electronic copy);
- rectify the information Barclays holds about them;
- erase their personal data;
- restrict Barclays use of this personal data;
- object to Barclays use of this personal data;
- lodge a complaint with the local data protection authority.

Please refer to the Contact Us section (Section 9) below for further details on how to exercise these rights.

### 4. **Information sharing**

- 4.1 Where necessary Barclays may provide personal data about the Customer and Related Parties:
  - to other members of the Barclays Group, including (i) internal service companies and (ii) to other Barclays companies and entities with whom the Customer has a relationship.
  - to its suppliers and agents. Where Barclays engages with a supplier or agent to process Customer and Related Parties' information on its behalf, it will undertake due diligence, monitoring and assurance activities to ensure that the information is appropriately protected, and contractual clauses will be agreed between the parties to ensure that data protection and confidentiality is maintained.
  - to anyone as a result of any restructure, sale or acquisition of any Barclays Group member or to anyone to whom Barclays transfers or may transfer its rights.

- if Barclays is required, requested or permitted to do so by law, regulation, court order, or supervisory, regulatory or similar authority.
- for international payments where Barclays is required to send details of the payee and the beneficiary with the payment, and to overseas regulators and authorities in connection with their legitimate duties.
- with third party payers: we may share the name of the account holder or holders with third parties paying money into your account if it is necessary to confirm the payment is being made to the right account. (We would only do this where the name submitted by the payer is a close match with the account holder or holders name.)

Because Barclays operates as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which Barclays provides the services). See Section 6 on "International transfer of personal data" below for more information.

## 5. **Credit reference agencies and fraud prevention agencies**

- 5.1 For some Customers, Barclays will request searches from credit reference agencies (CRAs) for information about (i) the Customer or Related Parties, (ii) any accounts belonging to the Customer or Related Parties.. Barclays does this to assess creditworthiness and product suitability, check the identities of Customers and Related Parties, manage the Customer's account, trace and recover debts and prevent criminal activity.
- 5.2 Barclays will also continue to exchange Customer and Related Parties' information with credit reference agencies on an ongoing basis, including about any settled accounts and any debts not repaid on time. Credit reference agencies will share Customer and Related Parties' information with other organisations.
- 5.3 Please refer to the applicable country Corporate Banking Regulatory Information Guide for further information describing how credit reference agencies in each country use and share personal data.
- 5.4 The personal data Barclays collects from the Customer and Related Parties will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify the identity of the relevant individuals. If fraud is detected, the relevant individuals could be refused certain services, finance or employment. Further details of how personal data will be used by Barclays and these fraud prevention agencies, and individuals' data protection rights, can be obtained by contacting Barclays at the details below in Section 9.

## 6. **International transfer of personal data**

- 6.1 Where Barclays' transfers the client and Related Parties' personal data to other jurisdictions (in the operation of its business or for example to its suppliers or agents) it will ensure that appropriate safeguards are provided in order to ensure that the data transfers are subject to an adequate level of protection. These safeguards will include the use of contractual terms approved by the European Commission and/or United Kingdom (UK) data protection authorities.

In the event that the UK leaves the European Union (EU), it will cease to be an EU member state. Nonetheless, Barclays may still be required (for the purposes described in this notice) to:

- Transfer the client and Related Parties' personal data from the UK to the EU, the European Economic Area (EEA) or elsewhere; and
- Receive the client and Related Parties' personal data from outside the UK (including from the EU/EEA) into the UK.

Where Barclays make or receive such transfers, Barclays will ensure that those transfers are lawful and (where necessary) we shall put in place appropriate measures, such as contractual terms approved by the European Commission or UK data protection authority or other valid data transfer mechanisms, to ensure that personal data is sent and received in accordance with applicable law.

## 7. **Retention of personal data**

7.1 Barclays will retain Customer personal data following closure of the Customer's account(s) or following a transaction for a period of time, which will be calculated depending on the type of personal data, and the purposes for which it is held by Barclays. Barclays will only retain Customer personal data to enable it to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the law. (for example, as required under legislation concerning the prevention, detection and investigation of money laundering and terrorist financing).
- Defend or bring any existing or potential legal claims.
- Deal with any future complaints regarding the services Barclays has delivered.

7.2 The retention period is often linked to the amount of time available to bring a legal claim, which in some jurisdictions can for example be six or seven years following closure of the Customer('s) accounts or following a transaction. Barclays will retain Customer personal data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require Customer personal data to be retained, or for regulatory or technical reasons. Where Barclays retains this data it will continue to make sure that Related Parties' privacy is protected.

## 8. **Cookies**

8.1 Barclays may use cookies and similar technologies on its websites, mobile apps, and in its emails. Cookies are text files that hold small amounts of information, which an individual's computer or mobile device stores when they visit a website or use a mobile app. When the individual returns to the websites or mobile apps – or visit websites and mobile apps that use the same cookies – they recognise these cookies and therefore the individual's device.

8.2 Barclays uses cookies for a number of purposes, such as allowing individuals to navigate between pages efficiently, remembering individual's preferences and generally improving their online experience. Barclays also uses cookies in some of its emails to help it to understand how users interact with its emails, and to help it improve future email communications. Cookies can also help to ensure that online adverts displayed to individuals are more relevant to them and their interests

8.3 Barclays also uses similar technologies such as pixel tags and JavaScript to undertake these tasks.

8.4 Barclays' websites and mobile app terms and conditions provide further information on these technologies, how and where Barclays uses them, and how individuals can control them.

## 9. **Contact us**

- 9.1 Subject access requests should be submitted via the online [Subject Access Request form](#).
- 9.2 For any other type of request, please contact your Relationship team in the first instance. You may also refer to the [Contact](#) section of the Barclays Corporate Banking website.
- 9.3 The Barclays Data Protection Officer can be contacted by email at [dpo@barclays.com](mailto:dpo@barclays.com) or by mail at: The Data Protection Officer, Barclays, Leicester, LE87 2BB, UK. Please note that we can't guarantee the security of your Personal Data while it's in transit to us. Therefore, if you choose to contact the Data Protection Officer by email, we advise that you keep Personal Data to a minimum, and in particular that you don't include full account information.
- 9.4 Barclays is committed to working with individuals to obtain a fair resolution of any complaint or concern about privacy. If, however, individuals believe that Barclays has not been able to assist with their complaint or concern, they have the right to make a complaint to a data protection authority. Details of the national data protection authorities within the EU are available on the [European Commission website](#).

## 10. **Changes to the Privacy Notice**

- 10.1 The information in this privacy notice is current at the time of the date below, but Barclays may modify or update this privacy notice from time to time. You can ask your Relationship Team for the latest copy of this privacy notice at any time.
- 10.2 Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on the Customer or Related Parties, Barclays will give sufficient advance notice.

**Last updated on 18 May 2020**

Barclays Bank PLC is registered in England (Company No. 1026167) with its registered office at 1 Churchill Place, London E14 5HP. Barclays Bank PLC is authorised by the Prudential Regulation Authority, and regulated by the Financial Conduct Authority (Financial Services Register No. 122702) and the Prudential Regulation Authority. Barclays is a trading name and trade mark of Barclays PLC and its subsidiaries.

Barclays Bank Ireland PLC is registered in Ireland. Registered Office: One Molesworth Street, Dublin 2, Ireland D02 RF29. Registered Number: 396330. A list of names and personal details of every director of the company is available for inspection to the public at the company's registered office for a nominal fee. Barclays Bank Ireland PLC is regulated by the Central Bank of Ireland.