Barclays Corporate Banking Customer Privacy Notice

- 1. Personal data Barclays collects
- 2. What Barclays uses personal data for and on what legal basis
- 3. Individual Rights
- 4. Information sharing
- 5. Credit reference agencies and fraud prevention agencies
- 6. International transfer of personal data
- 7. Retention of personal data
- 8. Cookies
- 9. Contact us
- 10. Changes to the privacy notice

Download the full Customer Privacy Notice - English (PDF 254KB)

See our Privacy and cookies policy.

This privacy notice describes how the Barclays companies as data controllers and branches listed below (collectively "Barclays") collect and processes your personal data, how they use and protect this information, and your individual rights in relation to this information.

Barclays Bank PLC
BB PLC Dubai International Financial Centre (DIFC) Branch
Barclays Bank Ireland PLC
Belgium Branch
German Branch
French Branch
Italian Branch
Luxembourg Branch
Netherlands Branch
Portuguese Branch
Spanish 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; and

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.
- o 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 publicly 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 but are not restricted to:
- Personal details (e.g. name, date of birth, passport information, identification information, biographical information, information about personal interests)
- o Contact details (e.g. phone/mobile number, email address, postal address).
- O Customer-related details (e.g. relationship with the Customer or Related Parties, business information, information about any shareholdings, business contact details).
- o 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 legal obligations.

2. What Barclays uses personal data for and on what legal 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 management, and for account administration and management purposes,	 Where the law requires this. Where it is necessary for the performance of a contract with a sole trader, partnership or co-ownership Customer. 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.	 Where the law requires this. Where it is necessary for the performance of a contract with a sole trader, partnership or co-ownership Customer. 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.	 Where the law requires this. 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	Where it is in Barclays legitimate interests to provide information about its business

members of the Barclays Group, and other	and services that it considers would
communications such as research and insights,	benefit or inform its Customers.
that may be of interest to the Customer and	
Related Parties. (See section 9 below on how to	
stop receiving communications of this nature).	
Complying with legal obligations to which it is	Where the law requires this
subject and co-operating with regulators and law	
enforcement bodies.	
Exercising its legal rights where it is necessary to	Where the law requires this
do so, for example to protect Barclays against	• Where it is in Barclays legitimate interests
harm to its rights and property interests, to	to prevent and investigate fraud, money
detect, prevent and respond to fraud or other	laundering and other crimes and to verify
violations of law, for legal and dispute	the Customer's identity in order to
management purposes, and for debt collection	protect its business and to comply with
and recoveries purposes	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. Individual Rights

- 3.1 Individuals have certain rights regarding their personal data, subject to local law. These include the right to:
 - be informed about what Barclays will do with their personal data;
 - access their personal data by submitting a subject access request (including receiving this data in an electronic form);
 - 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; and
 - data portability.
- 3.2 A person's ability to exercise these rights will depend on a number of factors and in some instances we will not be able to agree to a request (for example, if we have a legitimate reason for not doing so or the right doesn't apply to the particular data we hold about the person).

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

If any of your information changes or is incorrect, please contact us.

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 relevant parties 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.
 - to 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.)
- 4.2 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" 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 CRAs on an ongoing basis, including about any settled accounts and any debts not repaid on time. CRAs will share Customer and Related Parties' information with other organisations.
- 5.3 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 using the details in Section 9.

6. International transfer of personal data

6.1 Where Barclays transfers Client/Customer, Related Parties' and Employee personal data to third countries (in the operation of its business between Barclays entities or to its suppliers or agents), appropriate safeguards are used in order to ensure that the data transfers are subject to an adequate level of protection. Safeguards include:

- the Intra-Group Agreement (IGA) for transfers of personal data between Barclays group of entities:
- the use of Standard Contractual Clauses (SCCs) for transfers of personal data to third parties and vendors: and
- where necessary, conducting Data Transfer Impact Assessments (DTIAs) prior to any transfer of personal data to a third country.

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 We use cookies in some of our emails. They help us to understand a little bit about how you interact with our emails and are used to improve our future email communications.
- 8.5 The Cookies Policy on our websites and apps give you more information on cookies, how and where we use them, and how you 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 or by mail at: The Data Protection Officer, Barclays, Leicester, LE87 2BB, UK. Please note that we cannot guarantee the security of your Personal Data while it is in transit to us. Therefore, if you choose to contact the Data Protection Officer by email or post, 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. Or for Dubai International Finance Centre at www.difc.ae/laws-regulations/data-protection
- 9.5 If you are an EU citizen or Regulator, for the purposes of the General Data Protection Regulation (GDPR), our Appointed Representative is Barclays Bank Ireland PLC. If you are a UK citizen or Regulator, for the purposes of the UK GDPR, our Appointed Representative is Barclays Bank PLC. The Appointed Representatives can be contacted via our Data Protection Officer email address.

10. Changes to the Privacy Notice

- 10.1 The information in this privacy notice is current as at 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 personal data processing or otherwise have a substantial impact on the Customer or Related Parties, Barclays will give sufficient advance notice.

Last updated on 02 September 2022

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 trademark 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.