

Client Privacy Notice

This privacy notice describes how Barclays Bank PLC, Barclays Bank Ireland PLC and Barclays Capital Securities Limited (collectively "**Barclays**") collect and process personal data for the provision of investment banking products and services, how they use and protect this information, and individuals' rights in relation to this information. It applies to all personal data Barclays collects about the client. 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 client (referred to as "**Related Parties**"):

- Individual directors, company secretaries or other equivalent individual office holders and beneficial owners of the client
- Guarantors and third-party security providers
- Legal representatives and other individuals authorised to act on behalf of the client
- Individuals associated with the directors and beneficial owners of the client's business
- Any employees, contractors, representatives, officers or agents of the client
- All authorised users of the Barclays Live service

1.2 Barclays collects personal data directly from the client and Related Parties and also from other sources described below:

- Barclays will check its own records for information about (i) any accounts belonging to the client or any associated businesses and (ii) the client's shareholders who are beneficial owners of the businesses
- Barclays may carry out searches using financial crime prevention agencies for information relating to the client's business and Related Parties
- Barclays may search publically available sources, such as media stories, for information relating to the client's business and Related Parties.

1.3 The categories of information that Barclays collects about the client and Related Parties include:

- Personal details (e.g. name, date of birth, passport information, identification information, information about personal interests)
- Contact details (e.g. phone number, email address, postal address or mobile number, Bloomberg address)
- Client-related details (e.g. relationship with the client or Related Parties, business information, information about any shareholdings, business contact details, marketing information)
- Transactional details (e.g. information about services, requests, queries or complaints)
- Financial details (e.g. information about business accounts, financial history, information from fraud prevention agencies)

Professional details (e.g. role and position within the client, specialist business skills and expertise)

- 1.4 Some of the information that Barclays collects are special categories of personal data (also known as sensitive personal data). For example, the client due diligence checks Barclays carries out may reveal political opinions or information about criminal convictions or offences about clients 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 clients. 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 client and Related Parties' personal data. The table below sets out the purposes for which Barclays uses personal data about clients 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 your information for	The legal basis for doing so
Client administration and management, including relationship management, and for account administration and management purposes	<ul style="list-style-type: none"> • Where the law requires this • Where it is in Barclays legitimate interests to ensure that its client accounts are well-managed, so that its clients are provided with a high standard of service, to protect its business interests and the interests of its clients
Transaction processing, registering of trades, monitoring and analysis activities to develop and manage our products and services	<ul style="list-style-type: none"> • Where the law requires this • 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 clients with a high standard of service

Undertaking client 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	<ul style="list-style-type: none"> • 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 client's identity in order to protect its business and to comply with laws that apply to it
Communicating with the client 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 client and Related Parties	<ul style="list-style-type: none"> • Where it is in Barclays legitimate interests to provide information about its business and services that it believes would benefit or inform its clients
Complying with legal obligations to which it is subject and co-operating with regulators and law enforcement bodies	<ul style="list-style-type: none"> • Where the law requires this
Exercising its legal rights where it is necessary to do so, for example 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	<ul style="list-style-type: none"> • 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 client's identity in order to protect its business and to comply with laws that apply to it
Providing services requested by the client (such as Barclays Live), for user authentication, management and administration of services and monitoring and reporting to develop and improve our services	<ul style="list-style-type: none"> • Where it is in Barclays legitimate interests to ensure that its services are well-managed, so that its clients are provided with a high standard of service, to protect its business interests and the interests of its clients
To share your information (for example, your corporate email address), in a secure format, with social media and third-party digital platforms so we can tell you about our products and services.	<ul style="list-style-type: none"> • Where we have your permission to do so. • It is in our legitimate interests to use social media companies and third-party digital platforms to share information with you about our products or services that may be relevant and beneficial to you.

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 client and Related Parties' personal data to meet its legitimate interests, it puts in place robust safeguards to ensure that the client and Related Parties

privacy is protected and to ensure that its legitimate interests do not override the client and Related Parties' interests or fundamental rights and freedoms.

- 2.4 Barclays may contact the client's guarantors and security providers in connection with any products and services provided to the client by Barclays.
- 2.5 Where Barclays processes any information about clients 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**

- 3.1 Individuals have certain rights regarding their personal data, subject to local law. These include the following rights to:
 - access their personal data;
 - 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;
 - right to data portability; and
 - lodge a complaint with the local data protection authority.

Please refer to the Contact Us section (Section 8) below for further details on how to exercise these rights.

4. **Information sharing**

- 4.1 Where necessary Barclays may provide personal data about the client 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 client has a relationship.
 - to its suppliers and agents. Where Barclays engages with a supplier or agent to process client 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.

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 the section on "International transfer of personal data" below for more information.

5. **International transfer of personal data**

- 5.1 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 DIFC Data Protection Commissioner, European Commission, and/or United Kingdom data protection authorities.

Further information about the safeguards used by Barclays can be obtained from the Barclays Data Protection Officer.

Following the departure of the United Kingdom from the European Union (EU), 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 other valid data transfer mechanisms, to ensure that personal data is sent and received in accordance with applicable law.

6. **Retention of personal data**

- 6.1 Barclays will retain client personal data following closure of the client'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 client 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.

- 6.2 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 years following closure of the client('s) accounts or following a transaction. Barclays will retain client 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 client 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.

7. **Cookies**

- 7.1 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.
- 7.2 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
- 7.3 Barclays also uses similar technologies such as pixel tags and JavaScript to undertake these tasks.
- 7.4 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.

8. **Sharing your data with social media and third party digital platforms**

- 8.1 Your email address may be shared, in a secure format, with social media and third-party digital platforms so they can provide you content about Barclays products and services.
- 8.2 If you do not want us to share your personal information with social media and third-party digital platforms for this purpose, you can tell us not to.
- 8.3 The social media and third-party digital platforms this section applies to are LinkedIn and Google.

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 Us](#) section of the Barclays Investment Bank 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 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 If you are an EU citizen or Regulator, for the purposes of GDPR, our Appointed Representative is Barclays Bank Ireland PLC. The Appointed Representative can be contacted via Our Data Protection Officer email address.
- 9.5 If you are an 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.
- 9.6 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 the data protection authorities of the United Kingdom (www.ico.org.uk) or Ireland (www.dataprotection.ie). For Dubai International Finance Centre at www.difc.ae/laws-regulations/data-protection or for Turkey at <https://www.kvkk.gov.tr/Home?langText=en>.

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 client or Related Parties, Barclays will give sufficient advance notice.

Last updated on 27 March 2023