

# Data Privacy Notice



Business Banking  
Effective from 25 May 2018

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## 1. Introduction

Barclays is committed to protecting the information that we hold about our customers. This privacy notice describes how, when, and why Barclays Bank UK PLC (“we”) may use customer information from our business customers, as well as your rights in relation to this information. For the purposes of this notice, “you” and “your” means any business customer (a sole trader, company or partnership). Where an account, product or a service has more than one holder, owner or signatory, “you” or “your” can refer to any, both or all of you.

This privacy notice also gives you details around how others will use this information, such as other members of the Barclays Group. Please see section 4 “Who we share your information with” for more details on this.

## 2. Information we hold about you

Information we hold about you and people connected to your business will often come from you directly (e.g. when you apply for a new product), this will include the following:

- personal details (e.g. name, date of birth, passport information or other identification information);
- contact details (e.g. phone number, email address, postal address or mobile number);
- biometric information (e.g. voice recognition when you call some of our call centres, as well as facial recognition for certain products);
- transactional details (e.g. payments you make and receive);
- financial information (e.g. bank account number, credit or debit card numbers, financial history) including information you provide for the purposes of providing payment initiation services and account information services regarding accounts you hold with other providers;
- details about your health and lifestyle (e.g. to meet our regulatory obligations, including responsible lending);
- information about criminal convictions and offences (e.g. for mortgage applications); and
- information about any other Barclays products and services you currently have, you have applied for, or you have previously held.

If you do not provide personal data that we tell you is mandatory, it may mean that we are unable to provide you with the services and/or perform all of our obligations under our agreement with you.

We will also hold information we collect about you from other sources, this will include:

- the way you are using our branches, telephone services, websites or mobile applications;
- your interactions with us, for example, through social media or other channels;
- your digital devices where we perform various checks designed to ascertain and verify your residency to ensure we meet our regulatory obligations. These checks include identifying the IP address your device connects from and the collection of information about your use of the website or mobile app (including device type, operating system, screen resolution, and the way you interact with us);
- the way you use your accounts, including information about payments you make or receive such as the date, amount, currency and the details of the payee or payer (for example, retailers or other individuals);
- if you have used or made claims on any of the products and services that you have taken out with your business account;
- our own records about any other accounts (including personal accounts) or products you, or your business partners, have with us or other providers;
- where we think it is necessary, our own records about your shareholders (including beneficial owners), names of suppliers and companies you use or may have contractual or other agreements with, and other related individuals;
- information from credit reference agencies and fraud prevention agencies;
- publically available information about your business which is available online or otherwise;
- organisations that provide their own data, or data from other third parties, to enable us to enhance the personal and company data we hold, and then provide more relevant and interesting products and services to you;
- criminal record checks and information;
- employers;

- joint account holders, other Directors, Partners, signatories or employees in your business;
- people appointed to act on your behalf;
- credit reference agencies (who may check the information against other databases – public or private – to which they have access);
- other banks and financial institutions (for example because you have asked us to display your other accounts on our platforms, we have received information to address payments made in error, or you have switched your account to us);
- fraud prevention agencies; and
- publically available sources, such as media stories.

If you give us personal data about other people (such as directors, owners, business partners or employees) which we'll use to provide services, or if you ask us to share that information with third parties, for example to provide payment initiation or account information services, then you confirm that you know that they are aware of the information in this notice about how we will use their personal data.

### 3. What we use your information for and the legal basis for doing so

We must have a legal basis to process your personal data. In most cases, the legal basis will be one of the following:

- to allow us to take actions that are necessary in order to provide you with the product / service (performance of a contract), for example, to make and receive payments;
- to allow us to comply with our legal obligations, for example, obtaining proof of identity to enable us to meet our anti-money laundering obligations;
- to meet our legitimate interests, for example, to understand how customers use our services and to develop new services, as well as improve the service we currently provide;
- where we have your consent to do so; or
- in the case of special categories of personal data, that it is in the substantial public interest.

The table below sets out the purposes for which we use your personal data and our legal basis for doing so. Where we are relying on a legitimate interest, these are also set out below:

What we use your information for	The legal basis for doing so
To provide, manage and personalise our services to you.	<ul style="list-style-type: none"> <li>• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</li> <li>• Where the law requires this</li> <li>• Where it's in our legitimate interests to ensure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers</li> </ul>
To communicate with you about your product / service for legal, regulatory and servicing purposes.	<ul style="list-style-type: none"> <li>• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</li> <li>• Where the law requires this</li> </ul>
To manage complaints, undertake remediation activities (e.g. PPI) and to resolve queries.	<ul style="list-style-type: none"> <li>• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</li> <li>• Where the law requires this</li> <li>• Where it is in our legitimate interests to ensure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent complaints from occurring in future</li> </ul>

## What we use your information for

To check your instructions to us, and to analyse, assess and improve our services, and for training and quality purposes. We may monitor or record any communications between you and us, including telephone calls to do so.

To develop and improve products and services through assessment and analysis of the information, including credit or behavioural scoring (or both), market and product analysis, and market research. We will also share statistical information with you to help you understand your business performance in comparison to broader customer trends and to help you save money.

To undertake checks for the purposes of security, detecting and preventing fraud and money laundering, and to verify your identity before we provide services to you.

To make scoring decisions relating to suppliers, companies or other businesses you have a relationship with.

To contact you with marketing and offers relating to products and services offered by us and/or other members of the Barclays Group (unless you have opted out of marketing, or we are otherwise prevented by law from doing so).

We may share some personal data (e.g. mobile number or email address) in an encrypted format with social media companies so that they can match this to personal data they already hold in order for them to display messages to you about our products and services.

To recover debt owed and enforce other obligations we are entitled to under our agreement(s) with you, as well as to protect ourselves against harm to our rights and property interests.

## The legal basis for doing so

- Where the law requires this
- Where it's in our legitimate interests to develop and improve our systems, train our staff and provide our customers with a high standard of service
- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where it's in our legitimate interests to develop and improve our products and services to ensure we can continue to provide products and services that our customers want to use and to ensure our business model remains competitive
- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- Where it is in our legitimate interests to detect, prevent and investigate fraud, money laundering and other crimes and to verify your identity in order to protect our business
- Where it is in our legitimate interests to ensure that our business model remains viable by only providing credit to customers who can afford to pay us back
- Where it is in our legitimate interests to provide you with information about our products and services that may be of interest
- In relation to direct electronic marketing, where we have your consent to do so
- Where it is in our legitimate interests to provide you with information about our products and services that may be of interest
- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- Where it is in our legitimate interests to ensure that our business is run prudently and we are capable of recovering the debts owed to us, as well as ensuring our assets are protected

## What we use your information for

To apply for or obtain quotations for a product of an insurance company/organisation, as well as to assist the providers of such insurance with the general administering and servicing of your insurance.

To (if you ask us to) provide payment initiation and account information services regarding accounts you hold with other providers, or where third party providers request that we provide account information or payment initiation services in relation to accounts you hold with us (if you ask a third party provider to make this request).

To verify your identity and the identity of joint account holders, for example by using caller line identification technology to check we are speaking to the correct person.

Prevent and detect fraud, money laundering and other crimes (such as identity theft). For example, we may use CCTV in and around our premises to monitor and collect images or recordings of your voice (or both). We may also use caller line identification technology to check we are speaking to the correct person. We may also check if you are in the same country or near the same location as where your payments are being made. We do this by using your details to confirm whether your card and mobile device are in or near the same location. This can help prevent fraud on your account and reduce the likelihood of your payments being rejected while you are not in the UK. We won't use this information for any other purpose. You can ask us to stop applying this fraud protection to your account by writing to us or calling us.

To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.

## The legal basis for doing so

- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- Where it is in our legitimate interests to be able to offer you insurance products and obtain quotes for these products
- In the case of data out (e.g. passing data to payment services aggregators), where the law requires this
- In the case of data in (e.g. display of your other accounts), where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- Where it is in our legitimate interests to verify your identity in order to protect our business and to comply with laws that apply to us
- Where the law requires this
- Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us
- Where such processing is a contractual requirement of the services or financing you have requested
- Where the law requires this
- Where it is in our legitimate interests to protect our business
- For the use of sensitive data (see below), where it is in the substantial public interest

## What we use your information for

To prepare high-level anonymised statistical reports that would contain details such as the percentage of people using the Tube in London or the age of people taking a certain product. We compile these reports from information about you and other Barclays customers. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties including non-Barclays companies, or we may use them for our own analytical purposes e.g. to analyse our credit risk.

To personalise the marketing messages we send you to make them more relevant and interesting. For more information on when we stop processing your data for marketing purposes, please see section 11 “Automated Processing”.

## The legal basis for doing so

- Where the law requires this
- Where it is in our legitimate interests to develop and prepare these reports to enable us to better understand how our customers use our products and what changes we could make to improve them
- Where it is in our legitimate interests to provide customers with information more relevant to their circumstances

When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests do not override your interests or fundamental rights and freedoms.

## Special categories of data

Some of the information we collect are special categories of personal data (also known as sensitive personal data). In particular, we may process personal data that relates to your health (such as medical history), biometric data, and any criminal convictions and offences. Where we process such sensitive personal data, we will do so on the basis that it is necessary for reasons of substantial public interest, to establish, exercise or defend any legal claims, or in some cases, with consent. In any case, we will carry out the processing in accordance with applicable laws.

## What we use your sensitive data for

Customer due diligence checks Barclays carries out may reveal political opinions or information about criminal convictions or offenses about you.

We may use your biometric data for some of the purposes set out above e.g. to detect and prevent fraud and money laundering, and to verify your identity.

We may use your medical information for some of the purposes set out above e.g. to resolve complaints and queries, to help provide, manage and personalise our services to you, to apply or obtain quotations for a product of an insurance company.

## The legal basis for doing so

- Where it is in the substantial public interest
- Where we have your consent for optional use of biometrics (such as voice recognition to identify you)
- Where it is in the substantial public interest
- Where it is in the substantial public interest
- Where we have your consent to do so, such as placing markers on your account which tell us you are hard of hearing or have poor eyesight so need to receive a braille statement

## What we use your sensitive data for

## The legal basis for doing so

Customer due diligence checks Barclays carries out may reveal political opinions or information about criminal convictions or offenses about you.

To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.

Where our systems analyse information which provides us with sensitive data e.g. mapping payments geographically so it shows you have spent time at a political party conference

- Where it is in the substantial public interest
- Where it is in the substantial public interest
- Where we have your consent to do so

We will send you messages by post, telephone, text, email and other digital methods, including for example via our ATMs, mobile applications, push notifications, or online banking services (and new methods that may become available in the future). These messages may be:

- to help you manage your account(s)
- messages we are required to send to comply with our regulatory obligations, such as changes to your agreements, and to give you information you need to manage your money
- to keep you informed about the features and benefits of the products and services you hold with us
- to tell you about products and services (including those of others) that may be of interest to you – these are marketing messages. You can ask us to stop or start sending you marketing messages at any time by writing to us, visiting a branch or calling us or, if you are an online or mobile banking customer, when you are logged in

We may obtain consent to collect and use certain types of personal data when we are required to do so by law (for example, sometimes when we process sensitive personal data or when we place cookies or similar technologies on devices or browsers). If we ask for your consent to process your personal data, you may withdraw your consent at any time by using the details at the end of this privacy notice, or if in relation to cookies or similar, via the cookie policy on [barclays.co.uk](https://www.barclays.co.uk)



## 4. Who will we share your information with?

We will keep your information confidential but we may share it with third parties (who also have to keep it secure and confidential) under the following circumstances:

### Who we share your data with and why

**Barclays Group companies.** Barclays Bank UK PLC is owned by Barclays PLC, so we work closely with other businesses and companies that fall under the Barclays Group family. We may share certain information with other Barclays Group companies for example, to provide you with products or services, for marketing purposes, for internal reporting and where those companies provide services to us.

**Payment-processing service providers and others that help us process your payments, as well as other financial institutions who are members of the payment schemes or involved in making the payment,** where that is needed in relation to specific payments, such as through Paym.

**Other financial institutions who you ask us to deal with,** for example when you switch your account from Barclays;

**Independent third-party service providers** who you (or a third party properly authorised to give instructions on your account) ask us to share information with, for example, payment initiation or account information services. If such information is shared with these third parties, we will have no control over how that information is used. You (or the person(s) with authority over your account) will need to agree the scope of such use directly with the third party.

**Companies that you have paid from your Barclays account** which request our help so they can apply a payment to you (because they didn't receive the information they needed with the payment), for example, utility companies.

**Our service providers and agents (including their sub-contractors).** This may include, for example, third party collection agents, or where we pass your details to someone who will print your statements, or deliver you a gift or a gesture of goodwill.

We may share your personal data with our **business partners who we provide services with**, such as those whose name or logo appears on a card issued to you, for example a hotel or airline partner or card scheme. We may also share information with other **service providers and agents who provide the services on their behalf.**

**Insurance providers, including insurance underwriters, coverholders, brokers, introducers, claims handlers and other such associated third parties.** When you make an insurance claim, information you give us or the insurer may be put on a register of claims. This will be shared with other insurers.

**Government Agencies.** For example, for mortgage customers, to confirm and validate the income information you provide us, we may share information about you with **HM Revenue and Customs (HMRC).** HMRC may also use the information that we provide them to inform risk profiling activities and to establish any mismatch with declared income.

**Any third party after a restructure, sale or acquisition of any Barclays company or debt,** as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).

**Anyone to whom we transfer or may transfer our rights and duties in this agreement.**

**Any potential guarantor.**

**Social media companies** (data shared in an encrypted format so that they can match this to personal data they already hold) to display messages to you about our products and services.

## Who we share your data with and why

**Your advisers** (such as accountants, lawyers, financial or other professional advisers) if you have authorised anyone like this to represent you, or any other person you have told us is authorised to give instructions or to use the account or products or services on your behalf (such as under a power of attorney).

**UK and overseas regulators, law enforcement agencies and authorities** in connection with their duties, such as crime prevention (whether directly or via third parties such as credit reference agencies), or carrying out social or economic statistical research. This may include payment details (including information about others involved in the payment).

**Fraud prevention agencies.** In particular, we will always tell fraud prevention agencies if you give us false or fraudulent information. They will also allow other organisations (in the UK or abroad), including law enforcement agencies, to access this information to prevent and detect fraud or other crimes. You can ask us for the details of the fraud prevention agencies we share information with.

**Credit reference agencies.** For more information on this, please see below.

Because we operate 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 we provide the services). Please see the section on “International Data Transfer” below for more information.

## 5. Insurance

If you take out an insurance product through us (Barclays Bank UK PLC or another company in the Barclays Bank UK PLC Group of companies) we will share your personal data with the relevant insurer for the purpose of the policy.

Details about how our insurance partners may use your data (including any personal data that you give to them directly) are contained in the insurers’ privacy notices, which will be made available to you prior to purchasing the policy.

## 6. Sharing information about you with tax authorities outside the UK

We may be required by law or regulation to share information about your accounts with the UK or relevant tax authorities, either directly or via the local tax authority. The tax authority we share the information with could then share that information with other appropriate tax authorities.

If we need extra documents or information from you about this, you must supply them. If you don’t, we may need to close your account or, if the law or other regulations require us to do so, we’ll withhold parts of certain payments received into your account, and pass the withheld funds to the relevant tax authorities. For more information on the international transfer of your data, please see the section on “International Data Transfer” below.

## 7. Credit reference agencies and fraud prevention agencies

We perform credit and identity checks on you and your business partners with one or more credit reference agencies and fraud prevention agencies. To do this, we will supply your personal data and your business partners' data to the credit reference agencies and fraud prevention agencies and they will give us information about you.

We can request searches from the credit reference agencies and fraud prevention agencies. We will ask for searches on:

- publically available information about you and your business partners' personal credit behaviour;
- information about the way you and your business partners have handled any personal borrowings, if your business has three or fewer directors or partners;
- information about your business, for example, details registered at Companies House;
- information about your business accounts;
- the identities of the beneficial owners of your business;
- the residential address of a director to confirm it is the same as that registered at Companies House; and
- information about the personal accounts of any 'associated person' of yours, please see below for more information on what 'associated person' means.

We will also continue to exchange information about you with credit reference agencies while you have a relationship with us. The credit reference agencies may in turn share your personal data with other organisations, which may be used by those organisations to make decisions about you. This may affect your ability to obtain credit.

We may also continue to collect information from credit reference agencies about you after your account is closed.

You must make sure your business partners and shareholders (if any) have agreed to us carrying out checks and to you disclosing information about them to us and the credit reference agencies.

Examples of circumstances when your information or information relating to your business or your business partners may be shared include:

- checking details on applications for products and services;
- making credit and affordability assessments to determine whether your application will be accepted and providing credit limits;
- managing credit and credit-related accounts or facilities;
- tracing your address so that we can continue to contact you about any existing or previous product(s) and account(s) you held with us, as well as recovering debts that you owe;
- checking details on proposals and claims for all types of insurance;
- checking your identity on a regular basis to comply with regulations and the law;
- providing identity check services to you where you have requested that the government, or another third party, confirms your identity.
- making enquiries when you ask for any lending products or investment products and to assist in managing your account;
- understanding your financial position through sharing and receiving information for example, about any borrowing (including borrowing outside Barclays) and how you manage it. This includes the amount you borrow and your payment history, including any payment arrangements;
- to inform and create modelling tools, e.g. assess how likely it is that a customer will invest in or open a new product, or in order to help us improve our products and services for our customers; and
- in order to update or add personal data that is not included or incorrect in our records in order to meet our legal or regulatory obligations.

We don't give information about savings accounts to credit reference agencies.

The Credit Reference Agency Information Notice (CRAIN) describes how the three main credit reference agencies in the UK each use and share personal data. The CRAIN is available on the credit reference agencies' websites:

- [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)
- [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)
- [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

You can go to [barclays.co.uk/control-your-data](http://barclays.co.uk/control-your-data) for the details of the credit reference agencies with which we share information.

Your information may be linked to people who are associated with you, such as your business partners and their information may be linked with their partners or members of their household. These linked records are called associated records. Any enquiry we make at a credit reference agency may be answered with reference to any associated person's records. Two people's record will be associated with each other when:

- they make a joint application;
- you or they tell us about a financial association with another person – for example, that they are a business partner;
- the credit reference agencies have existing associated records.

An association will be taken into account in all future applications by either or both of them. It continues until one of them applies to the credit reference agencies and succeeds in filing a disassociation, which allows their information to be unlinked. An individual can check for any associations by getting his or her credit record direct from the credit reference agencies.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. If fraud is detected, you could be refused certain services or finance.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

## 8. International data transfer

When we or fraud prevention agencies share information with organisations in another jurisdiction, we will ensure they agree to apply equivalent levels of protection for personal data as we do. If this is not possible – for example because we are required by law to disclose information – we will ensure the sharing of that information is lawful. Also, if they are not in a jurisdiction that the European Commission regards as having adequate levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments), in accordance with applicable legal requirements, to ensure that your data is adequately protected.

If you ask us to share information with third parties who provide payment initiation or account information services (either in the UK or in another country), we will rely on your request (whether direct or indirect) to share the relevant information. We don't have control over such third-party practices. We recommend that you (or the person(s) with authority over your account) consider the information-handling practices of that third party before requesting their services by reading their privacy notices or contacting them to ensure you are comfortable with how they will handle your information.

## 9. Retention of your data

We will keep your personal data for as long as we have a relationship with you. Once our relationship with you has come to an end (e.g. following closure of your account or following a transaction), or your application for a product is declined or you decide not to go ahead with it, we will only retain your personal data for a period of time that is calculated depending on the type of personal data, and the purposes for which we hold that information.

We will only retain information that enables us 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;
- Maintain records of anyone who does not want to receive marketing from us;
- Deal with any future complaints regarding the services we have delivered;
- Assist with fraud monitoring; or
- Assess the effectiveness of marketing that we may have sent you.

The retention period is often linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following closure of your account or following a transaction. We will retain your personal data after this time if we are required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require your personal data to be retained, or for regulatory or technical reasons. If we do, we will continue to make sure your privacy is protected.

## 10. Individual rights

An individual has certain rights regarding his or her personal information, subject to local law. These include the following rights to:

- request a copy of the personal information we hold about them;
- request that we supply them (or a nominated third party) with an electronic copy of the personal information that they or you have provided us with;
- inform us of a correction to their personal information;
- exercise their right to restrict our use of their personal information;
- exercise their right to erase their personal information; or
- object to particular ways in which we are using their personal information.

An individual's ability to exercise these rights will depend on a number of factors and in some instances, we will not be able to comply with this request e.g. because we have legitimate grounds for not doing so or where the right doesn't apply to the particular data we hold on that individual. If you or your business partners would like more information on these rights, or wish to exercise them, please submit a request via your online banking or go to [barclays.co.uk/control-your-data](https://www.barclays.co.uk/control-your-data).

Please contact us to update or correct your information if it changes or if the personal data we hold about you or your business partners is inaccurate.

## 11. Automated processing

The way we analyse personal data in relation to our services may involve profiling, this means that we may process your personal data using software that is able to evaluate your personal aspects and predict risks or outcomes. We may also use profiling, or otherwise employ solely automated means, to make decisions about you that relate to:

- credit and affordability assessment checks to determine whether your application will be accepted;
- credit limit decisions;
- anti-money laundering and sanctions checks;
- identify and verification checks;
- transaction monitoring for fraud & other financial crime, either to prevent you committing fraud, or to prevent you becoming a victim of fraud;
- screening of individuals who may be classed as “politically exposed”;
- assessments we are required to carry out by our regulators and applicable authorities to ensure we meet our regulatory obligations, for example, making determinations about those at risk of becoming financially vulnerable under applicable regulations;
- determining if an account is dormant / nil balance and dealing with its closure; and
- determining the insurance premium value for customers.

This is known as “automated decision-making” and is only permitted when we have a legal basis for this type of decision-making. We may make automated decisions about you:

- where such decisions are necessary for entering into a contract. For example, we may decide not to offer our services to you, or we may decide on the types of services that are suitable for you, or how much to charge you for our products based on your credit history and other financial information we have collected about you;
- where such decisions are required or authorised by law, for example for fraud prevention purposes; or
- where it is a reasonable way of complying with government regulation or guidance, such as our high level obligation to treat customers fairly.

You can contact us to request an automated decision to be reviewed by a human being.

## How the automated processes make decisions

### Credit and affordability assessments

We will consider a number of factors including information we hold about you that tells us how much income you have, how many outgoings you have and how well you have kept up on payments in the past. This will be used to work out how much we could lend to you that you could comfortably pay back to us.

### Regulatory assessments

We will consider activity on your accounts such as whether you are keeping up with payments, paying off debts, extending overdrafts, or whether you are showing signs of financial distress. For example, where an individual is extending an overdraft and has reduced income coming into an account this might indicate that a person is likely to get into financial distress. We will use this information for example to trigger a communication with you offering assistance which may take a variety of forms.

### Protecting you and your account against criminal / fraudulent activity

We will assess your transactions, and transactions that are unusual e.g. they are transactions that you would not normally carry out, for example at an unusual time or location will trigger alerts that may stop us from making a payment where this appears likely to be fraud on your account.

### Protecting us against criminal / fraudulent activity

We will assess a number of factors such as whether you have provided false information in the past, together with where you might be located geographically and other information about your credit history to determine whether you are a fraud, or other type of financial crime risk (e.g. whether offering services to you may be in breach of financial sanctions).

## Nil & dormant accounts

We will assess activity by you on your account. Accounts that have been dormant or at nil balance for a long period will trigger action by us, for example we would ultimately close such accounts.

## Other

We also analyse you based on your personal data in the following circumstances:

- to select personalized offers, discounts or recommendations to send you based on various attributes e.g. your credit history, account use and the products you hold with us. Please be aware that we will only stop using your personal data for these purposes if you ask us to completely stop sending all types of marketing messages to you. These are by post, email, telephone, text message and Online Banking and Barclays Mobile Banking (if you are registered for these services).
- to categorise your spending and present this information to you in a variety of ways to assist you to manage your finances
- to assist us to work out our overall credit risk exposure as a bank but in a way that does not impact on you.
- to assist us to work on our pricing model for products but in a way that has minimal impact on you.

We may also carry out automated anti-money laundering and sanctions checks. This means that we may automatically decide that you pose a fraud or money laundering risk if the processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk:

- we may refuse to provide the services you have requested or we may stop providing existing services to you.
- a record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services or employment to you.

You have rights in relation to automated decision making: if you want to know more please contact us using the details set out in the Contact Us section.

## 12. Cookies

We may use cookies and similar technologies on our websites, mobile apps, and in our emails. Cookies are text files that get small amounts of information, which your computer or mobile device stores when you visit a website or use a mobile app. When you return to the websites or mobile apps – or visit websites and mobile apps that use the same cookies – they recognise these cookies and therefore your device.

We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences and generally improving your online experience. They can also help ensure that the ads you see online are more relevant to you and your interests. We also use similar technologies such as pixel tags and JavaScript to undertake these tasks.

We also use cookies in some of our emails to help us to understand a little about how you interact with our emails, and to help us improve our future email communications. These cookies also help ensure that the ads you see online are more relevant to you and your interests.

Our websites and mobile app terms and conditions give you more information on these technologies, how and where we use them and how you can control them.

## 13. How to contact us

Please go to [barclays.co.uk/control-your-data](https://barclays.co.uk/control-your-data) if you have any questions about our privacy notice. If you would like more information on your rights, or wish to exercise them, please submit a request via your online banking or go to [barclays.co.uk/control-your-data](https://barclays.co.uk/control-your-data)

Our Data Protection Officer can be contacted at: **The Data Protection Officer, Barclays Bank UK PLC, Leicester, LE87 2BB or [DPO@Barclays.com](mailto:DPO@Barclays.com)**

Barclays Bank UK PLC is the 'data controller' for your personal data. This means it is responsible for deciding how we can use your personal data.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the United Kingdom using their website - <https://ico.org.uk>.

## 14. Changes to the privacy notice

A copy of this privacy notice can be requested from us using the contact details set out above. We may modify or update this privacy notice from time to time.

Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

**25 May 2018**