

Data privacy notice for under 18s

Personal banking

Effective from August 2021



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1. Introduction

We are committed to protecting the information we hold about you. This privacy notice describes how, when and why we, Barclays Bank UK PLC, may use your information, as well as your rights relating to that information. This privacy notice only applies to you if you are under 18. Once you turn 18, you will not be able to continue using a product for children under 18 and a different privacy notice will apply.

This privacy notice also explains how other organisations, such as other companies in the Barclays Group, will use your personal information (sometimes referred to as 'personal data'). Please see section 4 'Who we will share your information with' for more details.

2. Information we hold about you

Information we hold about you will often come direct from you (for example, when you apply for an account). That information will include the following.

- Your personal details (for example, your name, date of birth, passport number or other identification (ID))
- Your contact details (for example, your full home address, phone number, email address or mobile number)
- Biometrics (characteristics to identify you, for example by voice recognition when you call some of our call centres) and behavioural biometrics (information such as the way you use your device for our online services or when making online payments)
- Details of payments you make and receive
- Financial information (for example, your bank account number and debit-card number), including information you provide for the purposes of using a payment-initiation service (a service that lets you give us instructions, through a third party, to pay people or companies direct from your account rather than using your debit card) or an account-information service (a service that allows you to see your accounts, including non-Barclays accounts, in one place)
- Information about any other Barclays' products and services you currently have, you have applied for, or you have had in the past

If you do not provide personal information that we tell you is mandatory (that is, which you must provide), it may mean that we cannot provide you with the service you want or meet all our obligations to you.

We will also hold information we collect about you from other sources. This includes information about the following.

- How you are using our branches, telephone services, websites or apps
- Your interactions with us (for example, through social media)
- Your digital devices (when we carry out checks designed to confirm where you live, including identifying the IP address your device is connected to, your use of our website and apps, the type of device you use, the operating system and screen resolution, and the way you interact with us)
- The way you use your accounts, including information about the date, amount and currency of payments you make or receive, and who you make payments to or receive payments from (for example, retailers or other people)
- Whether you have used any of the products and services you have taken out with your current account (for example, travel, phone and gadget insurance)
- Any other accounts or products you have with us

We may collect information from the following.

- Criminal record checks and information
- Employers
- Joint account holders
- People appointed to act on your behalf
- Other banks and financial institutions (for example, when you have asked us to display their accounts on our platforms, we have received information from them to investigate incorrect payments, or you have switched your account to us)
- Businesses you own or are associated with

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

We must have a legal basis (a valid legal reason) to process your personal information. In most cases, the legal basis will be one of the following.

- To allow us to take action that is necessary for us to provide you with the product or service you want (for example, to make and receive payments)

- To allow us to meet our legal obligations (for example, getting proof of your identity or checking where your income is coming from)
- To protect our legitimate interests (for example, to understand how customers use our services so we can develop new services and improve the services we currently provide), unless there is a good reason to protect your personal information and that takes priority over our legitimate interests
- We have your permission to use your information
- In the case of sensitive personal information (known as special categories of personal information), to do something that is in the 'substantial public interest', such as protecting children and supporting customers who are vulnerable (for example, because they are homeless)

The table below sets out what we use your personal information for and our legal basis for doing so. If our legal basis is a legitimate interest, those interests are also set out in the table.

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"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • We have to by law • It is in our legitimate interests to make sure our customer accounts are well-managed, so that our customers receive a high standard of service, and to protect our business interests and the interests of our customers
To communicate with you about your product or service, for legal, regulatory and servicing purposes	<ul style="list-style-type: none"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • We have to by law
To support you if you are in what is considered to be a 'vulnerable circumstance' (such as being homeless or experiencing a bereavement). This may include placing a 'marker' on your account to indicate that you need extra support.	<ul style="list-style-type: none"> • It is in our legitimate interests to make sure we are providing products and services that meet customers' needs and our regulatory obligations • We have your permission • If we are using sensitive personal information (such as medical information), we have your permission or it is in the public interest
To manage complaints, take action to put matters right (for example, to give a refund), and to answer questions. We may also use your information to help us improve our services.	<ul style="list-style-type: none"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • We have to by law • It is in our legitimate interests to make sure that complaints are investigated (for example, so that we can prevent complaints from arising in the future)
To check your instructions to us, to analyse, assess and improve our services, for training and for checking quality (We may monitor or record any communications between you and us, including phone calls, for these purposes.)	<ul style="list-style-type: none"> • We have to by law • It is in our legitimate interests to develop and improve our systems, train our staff, and provide a high standard of service
To develop and improve products and services by assessing and analysing your information, including details of money coming into your account, your spending and how you use our products and services We will also share statistical information with you to help you understand how your spending pattern compares against that of customers in general, and to help you save money.	<ul style="list-style-type: none"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • It is in our legitimate interests to develop and improve our products and services, so that we can continue to provide products and services that our customers want to use, and to make sure we continue to be competitive
To carry out checks for the purposes of keeping your money and personal information secure, detecting and preventing fraud and money laundering (a process of making money arising from criminal activity appear to	<ul style="list-style-type: none"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • We have to by law

have been earned legally), and to check your identity before we provide services to you	<ul style="list-style-type: none"> • It is in our legitimate interests to detect, prevent and investigate fraud, money laundering and other crimes, and to check your identity in order to protect our business
To understand what products and services you would like to hear about. (However, we will not contact you with direct marketing until you turn 18.)	<ul style="list-style-type: none"> • It is in our legitimate interests to give you information about our products and services that you may be interested in
To check your identity and the identity of joint account holders (for example, by using caller ID technology to check we are speaking to the right person)	<ul style="list-style-type: none"> • It is necessary to keep to our agreement with you or to enter into an agreement with you • We have to by law • It is in our legitimate interests to check your identity so we can protect our business and keep to laws that apply to us
<p>To prevent and detect fraud, money laundering and other crimes (such as identity theft)</p> <p>For example, we may use CCTV in and around our premises to monitor and collect images or voice recordings (or both). We may also use caller ID technology to check we are speaking to the right person. We may also check if you are in the same country or near the same location as your payments are being made from. (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 risk of your payments being rejected while you are not in the UK.)</p> <p>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.</p>	<ul style="list-style-type: none"> • We have to by law • It is in our legitimate interests to prevent and investigate fraud, money laundering and other crimes, to check your identity in order to protect our business, and to keep to laws that apply to us • It is a requirement of the services you have asked for
To keep to laws and regulations that apply to us and co-operate with regulators and law enforcement agencies (for example, the police)	<ul style="list-style-type: none"> • We have to by law • It is in our legitimate interests to protect our business • If we are using sensitive personal information (see below), it is in the public interest
<p>For assessment, testing (including systems tests), analysis (including how you interact with our systems) and market research</p> <p>We may also use your information to prepare reports to be shared internally and with companies that are not in the Barclays group. When producing these reports, we may combine the information we have about you with information we receive from other companies. The information we share is never personal to you and nobody will be able to identify you from it.</p>	<ul style="list-style-type: none"> • We have to by law • It is in our legitimate interests to develop, build, improve and put in place business models, systems, products and services, and to produce and share reports for our benefit and the benefit of others, and to provide a high standard of service

Sensitive personal information

Some of the information we collect is sensitive personal information (also known as special categories of data). In particular, we may process personal information that relates to your health (such as your medical history), biometric information (such as voice recognition or patterns in how you use your device), and any criminal convictions and offences. If we use sensitive personal information, we will usually do so on the legal basis that it is in the substantial public interest or that we have your permission. In any case, we will keep to all laws that apply.

What we use your sensitive personal information for	The legal basis for doing so
When using biometrics – for some of the purposes set out in the previous table (for example, to detect and prevent fraud and money laundering, and to check your identity)	<ul style="list-style-type: none"> We have your permission to do so It is in the substantial public interest
We may use information you've given us about your personal circumstances (including medical information) for some of the purposes set out in the previous table. Examples include to: <ul style="list-style-type: none"> settle complaints and answer questions help provide, manage and personalise our services apply for, or get quotations for, insurance products, and flag up special circumstances, such as being bereaved or homeless, or needing adjustments to be made in order to use our services. 	<ul style="list-style-type: none"> It is in the substantial public interest We have your permission to do so
To keep to laws and regulations that apply to us, and co-operate with regulators and law enforcement agencies such as the police	<ul style="list-style-type: none"> It is in the substantial public interest

If the processing of information you have provided for a transaction unexpectedly provides us with sensitive information (for example, if you spend money at a health clinic), we will not use that information other than to complete your transaction.

We will send you messages by post, phone, text message, email and other digital methods, including through our cash machines, apps, push notifications (messages that pop up on mobile devices) and online banking services, and through new methods that may become available in the future. These messages may be:

- to help you manage your account
- messages we must send to meet our regulatory obligations, such as about changes to your agreements, and to give you information on managing your money
- to keep you informed about the features and benefits of the products and services we provide to you.

We may ask you for permission to collect and use certain types of personal information when we have to do so by law (for example, before we place cookies or similar technologies on devices or browsers, or when we process sensitive personal information). If we ask you for permission to process your personal information, you can refuse, or withdraw your permission at any time, by:

- using the details at the end of this privacy notice, or
- in relation to cookies or similar, through the cookie policy at [barclays.co.uk](https://www.barclays.co.uk).

4. Who we will share your information with

We will keep your personal information secure and confidential. If we need to share your information with others (third parties) in order to provide you with services or products, we will make sure those third parties also keep your information secure and confidential. We may share your personal information with the following third parties.

Who we share your personal information with and why
Barclays Group companies. We are owned by Barclays PLC, so we work closely with other companies in the Barclays Group of companies. We may share certain information with those companies (for example, to provide you with products or services, for marketing purposes, for internal reporting and where those companies provide services to us).
Providers of payment-processing services and other businesses that help us process your payments, as well as other financial institutions that are members of payment schemes (for example, Visa) or involved in making payments, if the information is needed for specific types of payment (for example, through Paym).
Third-party payers. We may share your name with anyone paying money into your account if this is necessary to confirm the payment is being made to the right account. We would only do this if the payer's name is a close match to your name or a joint account holder's name. (This does not apply to children under 13.)
Other banks. If a payment goes into your account by mistake, we may provide details about you and the incorrect payment to the bank that sent the payment, so they can recover the funds.

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 authorised to give instructions for you) ask us to share information with. If we share your information with these third parties, we will have no control over how they use it. You (or the person with authority to give instructions for you) will need to agree this direct with the third party.
Companies that you have paid from your Barclays account and that ask us for our help so they can process your payment to them (for example, because they didn't receive the information they needed when you made your payment).
Our service providers, our agents, and our agents' service providers. This may include, for example, if we pass your details to someone who will print your statements, deliver a gift or provide a gesture of goodwill.
Insurance providers and third parties who support them. When you make an insurance claim, information you give us or the insurer will be shared with third parties such as claims handlers or people carrying out repairs. The information may also be put on a register of claims. This will be shared with other insurers.
Government agencies (for example, the Skills Funding Agency) and any third parties who support such agencies
Any third party after a Barclays' company or debt is restructured, bought or sold, as long as that person uses your information for the same purposes you originally gave it us for.
Anyone we transfer or delegate our rights or obligations to, or may transfer or delegate) our rights or obligations to, as allowed under the terms and conditions of any contract you have with us. (When we transfer our rights or obligations, this means that that we have given the rights and obligations to another company or person and they are accountable going forwards. When we delegate our rights, this means that we ask another company or person to carry out our obligations for us, but we are still accountable.)
Any potential guarantor (that is, a person or company who agrees that they will do anything you are required to do, such as make a payment, if you cannot do it). A guarantor would usually be a person such as a parent.
Your advisers, such as a solicitor or accountant (if you have one) who you have authorised to represent you, or any other person you have told us is authorised to give instructions for you or to use your account, products or services.
UK and overseas regulators, law enforcement agencies, credit reference agencies and authorities, in connection with their duties, such as preventing crime or carrying out 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 allow other organisations (in the UK or abroad), including law enforcement agencies, to use 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.

Because we operate around the world, those we share information with may be outside the country you live in or we provide the services in. Please see section 8 'Sharing information abroad' for more information.

5. Insurance and subscriptions

If you take out insurance or a subscription service through us or another company in the Barclays Group of companies, we will share your personal information with the supplier of the insurance or subscription service.

Details about how these suppliers can use your information (including any personal information you give them yourself) is provided in the suppliers' own privacy notices, which you will be given before you take out the product or subscription service.

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

By law, or under regulations, we may have to share information about your accounts with relevant tax authorities. Those tax authorities could then share that information with other appropriate tax authorities.

If we need extra documents or information from you about this, you must provide them. If you don't, we may need to close your account. We may also need to withhold all or part of certain payments made into your account, and pass the withheld amounts to the relevant tax authorities, if this is required by law. For more information, please see section 8 'Sharing information abroad'.

7. Fraud prevention agencies

We carry out checks with fraud prevention agencies. To do this, we will give the agencies your personal information and they will give us information about you.

Examples of circumstances when your information, or information about other members of your household, may be shared include the following.

- Checking details on applications for products and services
- Tracing your address so that we can continue to contact you about any products and accounts you have ever held with us, as well as recovering debts that you owe
- Checking details on applications and claims for all types of insurance
- Regularly checking your identity to keep to regulations and the law
- Providing identity-check services if you have asked the government, or another third party, to confirm your identity
- To create 'modelling tools' (for example, methods of identifying situations and behaviours that may indicate fraud). We do this by 'profiling', where your personal information is used to predict future risks or outcomes.
- Updating personal information that is not included in our records, or is incorrect in our records, so we meet our legal or regulatory obligations

We and fraud prevention agencies may also share your personal information with law enforcement agencies to detect, investigate and prevent crime. If fraud is detected, you could be refused certain services.

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

8. Sharing information abroad

When we or fraud prevention agencies share information with organisations in other countries, we will make sure they agree to protect your personal information to at least the same levels that we do. If this is not possible (for example, if the law states that we must pass on information), we will make sure the information is shared in line with the relevant law.

Although the UK has left the European Union (EU), we or fraud prevention agencies may still have to:

- transfer personal information from the UK to the EU, the European Economic Area (EEA) or elsewhere, and
- receive personal information from outside the UK (including from the EU or EEA) into the UK.

If we or fraud prevention agencies allow your personal information to be transferred outside the UK, this may be to a country where your information will be protected to the UK standard. Otherwise, fraud prevention agencies will make sure your information continues to be protected by having appropriate safeguards in place.

If necessary, we will put appropriate measures in place, such as relevant clauses in contracts, to make sure that your personal information is sent and received in line with any laws that apply.

If you (or somebody you have authorised) ask us to share information with 'authorised third parties' who provide payment-initiation or account-information services, we will give those third parties your information.

(By 'authorised third parties' we mean companies that are authorised by the Financial Conduct Authority or another European regulator to provide the relevant service. In the UK, the Financial Conduct Authority's register (available at <https://register.fca.org.uk/>) will tell you whether a company is authorised.)

We don't have control over how authorised third parties use your information. Before you ask us to share your information, we recommend that you (or the person acting for you) consider the data-protection practices of that third party by reading their privacy policies or contacting them.

9. Keeping your information

We will keep your personal information for as long as you are our customer. Once our relationship with you has ended (for example, after your account has closed or your application for a product is refused), we will only keep your personal information for a period of time that is appropriate for the type of information and what we hold it for.

We will only keep information that allows us to:

- keep accurate business records for analysis or audit purposes
- keep to relevant laws (for example, laws relating to preventing, detecting and investigating money laundering and funding terrorism)
- defend or take legal action
- keep records of anyone who does not want to receive marketing from us (although we do not use this information for marketing until you are 18)
- deal with any future complaints about the services we have provided, or
- help with monitoring fraud.

The period we keep information for is often linked to the amount of time a legal claim can be made in, which in many cases is six or seven years after our relationship with you has ended (for example, after you have closed your bank account). We will keep your personal information after this time if we have to do so to keep to the law, if there are

existing claims or complaints that will reasonably need us to keep your information, or for regulatory or technical reasons. If we do need to keep your information for a longer period, we will continue to protect that information.

10. Your rights

You have certain rights relating to your personal information. These include the right to:

- ask for a copy of the personal information we hold about you
- ask us to give you (or someone chosen by you) an electronic copy of the personal information you have given us
- ask us to correct personal information we hold
- restrict how we use your personal information
- ask us to delete personal information, and
- object to particular ways we are using your personal information.

Whether you can exercise these rights will depend on a number of things, and we may not be able to agree to your request (for example, if we have a legitimate reason for not doing so or the right doesn't apply to the information we hold about you). If you would like more information on your rights, or want to exercise them, you can do so through online banking or by going to [barclays.co.uk/control-your-data](https://www.barclays.co.uk/control-your-data).

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

11. Automated processing

The way we use personal information may involve 'profiling', where your personal information (including sensitive personal information) is analysed using software that can evaluate your circumstances and other factors to predict risks or outcomes. We may also use profiling, or other automated methods, to make decisions about you that relate to the following.

- Identity and address checks
- Monitoring your account for fraud and other financial crime, either to prevent you committing fraud or to prevent you becoming a victim of fraud
- Screening people who may be classed as 'politically exposed' (for example, if your parent is an MP)
- Assessments required by our regulators and appropriate authorities to make sure we meet our regulatory obligations (for example, making decisions about those at risk of becoming financially vulnerable)
- Deciding whether an account is dormant (no longer used) and, if so, closing it

This is known as 'automated decision-making' and is only allowed when we have a legal reason for this type of decision-making. We may make automated decisions about you in the following circumstances.

- If automated decisions are necessary for us to enter into a contract (for example, to decide on the types of services that are suitable for you, or how much to charge you for our products, based on financial information we have collected about you)
- If automated decisions are required or authorised by law (for example, to prevent fraud)
- If it is a reasonable way of keeping to government regulation or guidance, such as our obligation to treat customers fairly

You can contact us to ask for a person to review an automated decision.

[How automated processing makes decisions](#)

Regulatory assessments

We will consider activity on your accounts such as whether you are keeping up with payments, paying off debts or showing signs of financial difficulties. For example, if activity on your account indicates that you are likely to get into financial difficulties, we may use this information to offer you help.

Protecting you and your account against criminal or fraudulent activity

We will assess payments to and from your account to identify any that are unusual (for example, payments you would not normally make, or that are made at an unusual time or place). This may stop us from making a payment that is likely to be fraudulent.

Protecting us against criminal or fraudulent activity

We will assess a number of factors such as whether you have provided false information in the past, and where you might be at the time of a payment, to decide whether you are a fraud or financial-crime risk (for example, whether offering services to you may break or not be in line with financial restrictions).

Dormant accounts

If your account has not been used for a long period, we will start action to close the account.

Other

We also analyse your personal information in the following circumstances.

- To categorise your spending and present this information to you in a variety of ways, to help you to manage your finances
- To help us work out prices for products, but in a way that has a minimal effect on you

We may also carry out automated anti-money laundering and sanctions checks. This means that we may use automated methods to decide if you pose a fraud or money-laundering risk, by checking if:

- your behaviour is consistent with money laundering or fraudulent behaviour, or is different from your previous interactions with us, or
- you appear to have deliberately hidden your true identity.

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

- we may refuse to provide the services you have asked for, or may stop providing existing services to you, and
- the fraud prevention agencies will keep a record of any fraud or money-laundering risk, which may result in others refusing to provide services to you or employ you.

You have rights relating to automated decision-making. If you want to know more, please contact us using the details set out in section 11 'How to contact us'.

12. Cookies

We may use cookies and similar technologies on our websites and apps, and in our emails. Cookies are data files that we use to gather small amounts of information from your device when you visit our website or use the Barclays app. When you return to the website or app, or visit websites and apps that use the same cookies, they recognise these cookies and so 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. All cookies which are not essential are automatically set to 'off'. Please talk to a parent or guardian before you turn any cookies on or click on 'Accept all'.

The cookies policy on our websites and apps gives you more information on cookies, how and where we use them, and how you can control them.

13. How to contact us

If you have any questions about our privacy notice, go to barclays.co.uk/control-your-data. If you would like more information on your rights, or want to exercise them, please contact us through online banking or go to barclays.co.uk/control-your-data.

You can contact our Data Protection Officer by writing to:

The Data Protection Officer

Barclays Bank UK PLC

Leicester

LE87 2BB.

Or you can send an email to DPO@Barclays.com

Barclays Bank UK PLC is the 'data controller' for your personal information. This means they are responsible for deciding how we can use your personal information. If you are a Wealth Management customer, the data controller is Barclays Investment Solutions Limited.

We are committed to working with you to settle any complaint about privacy. If you are not happy with how we have dealt with your complaint or concern, you can complain to the data protection authority of the United Kingdom from their website at ico.org.uk.

14. Changes to our privacy notice

You can ask us for a copy of this privacy notice using the contact details set out above. We may change or update this privacy notice from time to time.

If changes to this privacy notice will have a major effect on what we do with your personal information or on you personally, we will give you enough notice to allow you to exercise your rights (for example, to object to the processing).

August 2021

Barclays Bank UK PLC, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Financial Services registration number 759676).

Registered in England, registration number 9740322

Registered office: 1 Churchill Place, London E14 5HP.

August 2021



You can get this privacy notice in Braille, large print or audio by calling 0800 400 100. Barclays welcomes calls through Relay UK and SignVideo. Visit [barclays.co.uk/accessibility](https://www.barclays.co.uk/accessibility) for more information.

Call monitoring and charges information

Calls may be monitored or recorded for quality and training purposes. Calls to 0800 numbers are free if made from a UK landline. Calls to 03 numbers are charged at the same rate as calls to 01 and 02 landlines, and will count towards any inclusive minutes you have covering calls to landline numbers. Charges may apply when calling from abroad.

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