



Data Privacy Notice

Wealth Management and Investments
Effective from May 2023



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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 PLC, may use your information, as well as your rights relating to that information.

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

Certain sections of this notice may only apply where you hold certain accounts with us. If this is the case, we have made this clear in this privacy notice.

2. Information we hold about you

Information we hold about you will often come from you directly (for example, when you apply for a new product). That information will include the following:

- Your personal details (for example, your name, date of birth, passport information or other identification information)
- Your contact details (for example, your postal address, phone number, email address or mobile number)
- Behavioural biometrics (information such as the way you use your device for our online services or when making online payments)
- Details of transactions (for example, payments you make and receive)
- Financial information (for example, your bank account number, credit- or debit-card numbers, financial history), including information you provide for the purposes of providing a payment-initiation service (a service that allows a third party to give us instructions to make payments from your account on your behalf) and an account-information service (a service that allows you to see your accounts with different providers in one place) for accounts you hold with other providers
- Proof of income (such as payslips or bank statements), if you provide these when you apply for a particular product
- Details about your health and lifestyle, to meet our regulatory obligations, including those relating to responsible lending
- Information about criminal convictions and offences (for example, for mortgage applications)
- 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 data 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. These checks include 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 payments you make or receive, such as the date, amount, currency, and the details of who you make payments to or receive payments from (for example, retailers or other people)
- Whether you have used, or made claims under, any of the products and services that you have taken out with your current account (for example, travel, phone and gadget insurance)
- Any other accounts or products you have with us or other providers, or any business you own or are associated with.

We may collect information from the following.

- Credit reference agencies (who may check their information against other databases – public or private – they have access to) and fraud prevention agencies
- Organisations that provide their own personal data, or personal data from other third parties, to help us to improve the personal data we hold, and provide more relevant and interesting products and services to you
- 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 to investigate incorrect payments, or you have switched your account to us)
- Publicly available sources, such as media stories and online registers or directories
- Businesses you own or are associated with, such as investment companies, trusts or partnerships, as well as the directors, partners, trustees, authorised officers or agents of those businesses.

If you give us personal data about other people (such as your family or joint account holders), or you ask us to share their personal data with third parties, you confirm that they understand the information in this notice about how we will use their personal data.

If you visit our social media pages or view our content on social media platforms (such as Facebook) both we and the social media platform provider will collect information about you, including:

- what you say (such as comments) or your actions (such as liking, sharing or recommending)
- your country or region (or your precise location if you have provided this in your user profile and you are logged in)
- your device and internet connection; and
- your social media profile details and user ID.

If you have allowed the use of tracking cookies on the social media platform, the information we collect will also include what you click on and what you view.

If you have allowed the use of tracking cookies on our website, the social media platform provider will be able to collect information about you, your device and which of our web pages you visited, and they will use it to show you products and services that may be of interest to you. We will receive anonymous statistical information about our marketing. You will not be identifiable from this.

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

We must have a legal basis (lawful reason) 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 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 to meet our anti-money laundering obligations)
- 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)
- We have your permission to use your information
- In the case of sensitive personal data (also known as special categories of personal data), it is in the substantial public interest (for example, to support you if you are or become a vulnerable customer).

The table below sets out what we use your personal data for and our legal basis for doing so. Where our legal basis is a legitimate interest (that is, where our interests do not outweigh our customers' interests), those interests are also set out in the table.

What we use your information for	The legal basis for doing so
<p>To provide, manage and personalise our services to you.</p>	<ul style="list-style-type: none"> • Where necessary to carry out our agreement or to take steps to enter into an agreement with you • Where the law requires this • It is in our legitimate interests to make sure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, and to protect our business interests and the interests of our customers.
<p>To communicate with you about your product or service, for legal, regulatory and servicing purposes.</p> <p>We may use information about your personal circumstances 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.</p>	<ul style="list-style-type: none"> • Where necessary to carry out our agreement or to take steps to enter into an agreement with you • Where the law requires this. • It is in our legitimate interests to make sure we are providing products and services that meet customer needs and our regulatory obligations • We have your permission • If we are using sensitive personal data (such as medical information), we have your permission or it is in the public interest.
<p>To manage complaints, take action to put matters right (for example, PPI refunds), and to answer questions.</p>	<ul style="list-style-type: none"> • Where necessary to carry out our agreement or to take steps to enter into an agreement with you • Where the law requires this • It is in our legitimate interests to make sure that complaints are investigated (for example, so that our customers receive a high standard of service and we can prevent complaints from arising in the future).
<p>To check your instructions to us, to analyse, assess and improve our services, and for training and quality purposes</p> <p>(We may monitor or record any communications between you and us, including phone calls, for these purposes).</p>	<ul style="list-style-type: none"> • Where the law requires this • It is in our legitimate interests to develop and improve our systems, train our staff, and provide our customers with a high standard of service.
<p>To develop and improve products and services, by assessing and analysing the information (which may include details of your transactions), including credit and behaviour scoring and market research. We may also use this information to help decide whether to offer you a product.</p> <p>We will also share statistical information with you to help you understand how your spending behaviour compares against that of customers in general, and to help you save money.</p>	<ul style="list-style-type: none"> • Where necessary to carry out our agreement or to take steps 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.
<p>To carry out checks for the purposes of keeping your money and personal data secure, detecting and preventing fraud and money laundering, and to check your identity before we provide services to you.</p>	<ul style="list-style-type: none"> • Where necessary to carry out our agreement or to take steps to enter into an agreement with you • Where the law requires this • 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.

To tell you about our products and services, and the products and services of other organisations and other members of the Barclays Group (unless you have opted out of marketing, or we are prevented by law from doing so).

- It is in our legitimate interests to give you information about our products and services that you may be interested in
- In the case of electronic marketing (for example, emails), we have your permission to do so.

To recover debt and exercise other rights we have under any agreement with you, as well as to protect ourselves against harm to our rights and interests in property.

- Where necessary to carry out our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- It is in our legitimate interests to make sure that our business is run prudently (that is, with consideration for what may happen in the future) and we can recover the debts owed to us, as well as making sure our assets are protected.

To share your information (for example, your mobile number and email address), in a secure format, with social media companies who can match this to personal information they already hold about you so they can display messages to you about our products and services.

If you do not want us to share your personal information with social media companies for this purpose, you can tell us not to.

We use the information collected when you visit our social media pages (for example, on Facebook) for reporting, customer insights (see note below) and marketing purposes. This helps us offer you more relevant content on the social media platform and create better marketing and allows us to get in touch if you have any feedback on our services. The social media platform provider (for example, Facebook) may also use the information collected for the same purposes.

Note: Customer insight, also known as consumer insight, means understanding and interpreting customer information, behaviour and feedback, and using them to improve product development and customer support.

- It is in our legitimate interests to use social media companies to share information with you about our products or services that may be relevant and beneficial for you
- It is in our legitimate interests to understand any feedback you have about our products or services and to deal with any concerns you have raised on our social media pages
- If you have allowed the use of tracking cookies on our website, we will receive anonymous statistical information from the relevant social media platform. You won't be identifiable from this.

To respond to your request for payment-initiation and account-information services for accounts you have with other providers, or if you have asked a third-party provider to ask us for information they need so they can provide you with account-information or payment-initiation services for accounts you have with us.

- In the case of information we provide (for example, to payment-initiation service providers), we must do so by law
- In the case of information we receive (for example, details of your other accounts), it is necessary for us to meet our obligations to you or to enter into an agreement with you.

To apply for, or get quotations for, an insurance product, and to help the provider of that insurance with managing your insurance.

- Where necessary to carry out our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- It is in our legitimate interests to be able to offer you insurance products and get quotes for those products.

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

- Where necessary to carry out our agreement or to take steps to enter into an agreement with you
- Where the law requires this
- It is in our legitimate interests to check your identity so we can protect our business and keep to laws that apply to us.

To 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 voice recordings (or both). We may also use caller line identification 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).

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 keep to laws and regulations that apply to us and co-operate with regulators and law enforcement organisations.

- Where the law requires this
- 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 or financing you have asked for.

- Where the law requires this
- It is in our legitimate interests to protect our business
- If we are using sensitive personal data (see below), it is in the public interest.

For assessment, testing (including systems tests), analysis (including credit and behaviour scoring) and market research. We may use this information to analyse our credit risk.

We may also use your information to prepare statistical, market-analysis and product-analysis to be shared internally and with non-Barclays companies. When carrying out analysis, we may combine the information we have with information we receive from non-Barclays companies. The information we produce and share is never attributed to you and you will not be able to be identified from it.

- Where the law requires this
- It is in our legitimate interests to develop, build, improve and put in place business models, systems, products and services, and to produce and provide reports for our benefit and the benefit of others, and provide a high standard of service.

To personalise the marketing messages you receive so they are more relevant and interesting.

This may include analysis of your transactions so we can understand what may be of most relevance and interesting to you.

We may also get information from third parties to tailor our marketing to you.

For more information on when we stop using your personal data for marketing purposes, see section 11.

- It is in our legitimate interests to provide information more relevant to customers' circumstances.

Sensitive personal data

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

What we use your sensitive personal data for	The legal basis for doing so
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<p>If you are a Wealth Management customer:</p> <p>To carry out due diligence checks (background checks, such as sanctions checks), which may reveal political opinions or information about criminal convictions or offences.</p>	<ul style="list-style-type: none"> It is in the wider public interest.
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<p>We may use your biometric data 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).</p>	<ul style="list-style-type: none"> We have your permission for any optional use of biometrics (such as your vocal pattern in voice recognition systems to identify you) It is in the wider public interest.
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<p>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:</p> <ul style="list-style-type: none"> settle complaints and answer questions help provide, manage and personalise our services help you 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 receive or use services (for example, needing to receive statements in Braille). 	<ul style="list-style-type: none"> It is in the wider public interest We have your permission 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.
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<p>We may use your medical information and information on criminal convictions to temporarily postpone your debt repayments and to help us consider other suitable repayment options for you.</p>	<ul style="list-style-type: none"> It is in the wider public interest.
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<p>To keep to laws and regulations that apply to us, and co-operate with regulators and law enforcement organisations.</p>	<ul style="list-style-type: none"> It is in the wider public interest.
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<p>Where our systems analyse information which provides us with sensitive information (for example, mapping payments geographically so it shows you have spent time at a political party conference).</p>	<ul style="list-style-type: none"> We have your permission to do so.
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We will send you messages by post, telephone, text message, email and other digital methods, including through our cash machines, apps, push notifications (messages that pop up on mobile devices) or 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; or
- to tell you about products and services (including those of other companies) 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, calling us or, if you use online banking or the Barclays app, when you are logged in.

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

4. Who we will 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) in the following circumstances.

Who we share your personal data with and why

Barclays Group companies. We are owned by Barclays PLC, so we work closely with other businesses and companies in the Barclays Group of companies. 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).

Providers of payment-processing services and other businesses that help us process your payments, as well as other financial institutions that are members of the payment schemes (for example, Visa) or involved in making payments, where that 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 with 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 properly authorised to give instructions on your behalf) ask us to share information with (for example, providers of payment-initiation or account-information services). 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 over your account) will need to agree this direct with the third party.

Companies (such as utility companies) that you have paid from your Barclays account and that ask us for our help so they can apply the payment to your account with them (for example, because they didn't receive the information they needed when you made your payment).

Our service providers and agents (including their subcontractors). This may include, for example, third-party collection agents we use, or where we pass your details to someone who will print your statements, deliver a gift or provide a gesture of goodwill. We may also ask third-party providers who act on your behalf to share your information with our agents or sub-contractors to enable us to provide a service you have requested.

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

Insurance product and subscription service providers. If you take out an insurance product or subscription service so you can use the provider's products and services, and to allow them to identify you as a customer, we share your personal data with the provider. The information you give direct to the provider will also be shared with us.

Insurance providers, including underwriters, 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, the Skills Funding Agency or its agents, third-party suppliers, subcontractors, advisers and group companies, for the purposes of managing the Professional and Career Development Loan).

For mortgage customers, **HM Revenue & Customs (HMRC)**, to confirm the income information you provide. HMRC may also use the information that we give them for their own checks and purposes and to check for any mismatch with your 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 you originally gave it us for.

Anyone we transfer or delegate (or may transfer or delegate) our rights or obligations to, as allowed under the terms and conditions of any contract you have with us.

Any potential guarantor.

Social media companies (in a secure format) so they can display messages to you and others about our products and services, or make sure you do not get irrelevant messages (for example, if you already have the Barclays product we want to advertise).

Any potential guarantor.

Social media companies (in a secure format) so they can display messages to you and others about our products and services, or make sure you do not get irrelevant messages (for example, if you already have the Barclays product we want to advertise).

Your advisers (such as accountants, lawyers and other professional advisers) who you have authorised to represent you, or any other person you have told us is authorised to give instructions, or use the account, 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 preventing crime (whether directly or through 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 and other third parties, in connection with actual or suspected fraud, financial crime or criminal activities, or with monitoring, preventing and investigating fraud, financial crime or criminal activities. 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 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.

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

Because we operate around the world, those listed in the table above may be outside the country you live in (or in which we provide the services). Please see section 8 'Sharing information abroad' for more information.

5. Insurance and subscriptions

If you take out an insurance product or a subscription service through us or another company in the Barclays Group of companies, we may share your personal data with the relevant supplier of the insurance or subscription service.

Details about how these companies can use your information (including any personal data you give to them yourself) are given in their privacy notices, which will be made available to you before you take out the product or subscription service.

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 relevant tax authorities, either directly or through 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 provide 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, please see section 8 'Sharing information abroad'.

7. Credit reference agencies and fraud prevention agencies

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

We will also continue to exchange information about you (and your accounts) with credit reference agencies while you are our customer. The credit reference agencies may in turn share your personal data with other organisations, which those organisations may use to make decisions about you. This may affect your ability to get credit.

We may continue to collect information about you (and your accounts) from credit reference agencies after your account is closed.

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

- Checking details on applications for products and services
- Making credit and affordability assessments to decide whether to accept your application and setting 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 products and accounts you held with us, as well as recovering debts that you owe

- Checking details on proposals (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
- Making enquiries when you ask for any lending products or investment products, and to help us manage your account
- Understanding your financial position by 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 create 'modelling tools', (for example, methods of assessing how likely it is that a customer will invest in or open a new product, or methods to help us improve our products and services for customers)
- Updating personal data that is not included in our records, or is incorrect in our records, so we 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 use and share personal data. The CRAIN is available on the credit reference agencies' websites:

- www.transunion.co.uk/crain
- www.equifax.co.uk/crain
- www.experian.co.uk/crain

You can go to barclays.co.uk/control-your-data for details of the credit reference agencies we share information with.

Your information held by credit reference agencies may be linked to people who are associated with you, such as your partner or other members of your household. These linked records are called associated records. Any enquiry we make to a credit reference agency may be answered from both your own record and any associated records. Another person's record will be associated with yours when:

- you are making a joint application
- you hold a joint credit account
- you tell us about a financial association with another person (for example, that they are your business partner); or
- the credit reference agencies already have existing associated records.

An associated record will be taken into account for all future applications made by either or both of you. The association continues until one of you makes a successful application for the credit reference agencies to file a 'disassociation', which allows your information to no longer be linked. You can check for any associations by getting your credit record direct from the credit reference agencies.

We and fraud prevention agencies may also share your personal data with law enforcement agencies 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. If you are considered to pose a risk of fraud or money laundering, your personal data 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 apply equivalent levels of protection for personal data as 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. Also, if a data protection authority does not consider their particular country to have adequate levels of protection for personal data, we will put in place appropriate measures (such as contractual commitments), in line with any legal requirements that apply, to make sure your personal data is adequately protected.

We or fraud prevention agencies may be required (for the purposes described in this notice) to:

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

If we, or fraud prevention agencies, allow your personal data to be transferred outside of the UK, this may be to a country where your information will be protected to UK standards. Otherwise, fraud prevention agencies will make sure your personal data 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 personal data is sent and received in line with any laws that apply.

If you ask us to share information with authorised third parties who provide payment-initiation or account-information services, we will follow the request (whether made by you or someone with authority to deal with the account on your behalf) to share the relevant 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 those third parties use your information. Before you make your request, we recommend that you (or the person acting on your behalf) consider data-protection practices of that third party by reading their privacy policies or contacting them.

9. Keeping your information

We will keep your personal data for as long as you are our customer. Once our relationship with you has ended (for example, after your account has closed or following a transaction such as a payment, your application for a product is refused, or you decide not to go ahead with an application), we will only keep your personal data for a period of time that is appropriate for the type of personal data, and what we hold it for.

We will only keep information that allows us to:

- maintain 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
- deal with any future complaints about the services we have provided
- help with monitoring fraud; or
- assess the effectiveness of marketing we may have sent you.

The period we keep information for is often linked to the amount of time available to bring a legal claim, which in many cases is six or seven years after your account closes or following a transaction such as a payment. We will keep your personal data after this time if we have to do so to keep to the law, if there are existing claims or complaints that will reasonably require 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 data. These include the right to:

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

Your ability to exercise these rights will depend on a number of factors, and in some instances we will 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 particular 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/wealth-management/important-information/privacy-notice or barclays.co.uk/control-your-data.

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

11. Automated processing

The way we analyse personal data relating to our services may involve profiling. This means that we may process your personal data (including sensitive personal data) using software that can evaluate your personal 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.

- Credit and affordability checks to see whether your application will be accepted
- Credit limits
- Anti-money laundering and sanctions checks
- 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 you are a government minister)
- 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 (that is, no longer used) and, if so, closing it
- Assessing insurance premium levels for customers.

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, 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
- 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

Credit and affordability assessments

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

Regulatory assessments

We will consider activity on your accounts such as whether you are keeping up with payments, paying off debts, extending overdrafts, or showing signs of financial difficulties. For example, if you are extending an overdraft and have a reduced amount coming into your account, this might indicate that you are likely to get into financial difficulties. We will use this information, for example, to contact you to offer appropriate forms of help.

Protecting you and your account against criminal or fraudulent activity

We will assess your transactions (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 location). 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, where you might be at the time and other information about your credit history 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 sanctions).

Dormant accounts

If your account has not been used for a long period, this will trigger action by us and we would ultimately close these accounts.

Pricing (including insurance)

We will assess a number of factors to set the price of certain products for you, such as insurance premiums, where we would assess factors like previous claims, where you live, your occupation and the value of the items you want to insure. We may also assess how you manage your accounts (including online) when setting a price for home insurance. This will allow us to identify the risk of providing cover and so the price we may be willing to offer to you.

Other

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

- To choose personalised offers, discounts or recommendations to send you, based on various factors such as your credit history and how you use the accounts and products you hold with us. We will only stop using your personal data for these purposes if you ask us to stop sending all marketing messages to you, whether by post, email, telephone, text message or through online banking or the Barclays app (if you are registered for these services).
- 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 our overall credit risk as a bank, but in a way that does not affect you
- 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 automatically decide that you pose a fraud or money laundering risk if the automated processing finds that your behaviour is consistent with money laundering or known fraudulent behaviour, is inconsistent with 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 we may stop providing existing services to you; and
- a record of any fraud or money laundering risk will be kept by the fraud prevention agencies, and 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 14 'How to contact us'.

12. Cookies

We use cookies and similar technologies on our websites and apps, and in our emails. Cookies are text files that gather small amounts of information, which your computer or mobile device stores when you visit a website or use an app. When you return to the website or app, or visit websites and apps that use the same cookies, they recognise these cookies and 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 make sure that the adverts you see online are more relevant to you and your interests. We also use similar technologies such as pixel tags and JavaScript for these purposes.

We also use cookies in some of our emails to help us understand how you interact with our emails and to help us improve our future email communications. These cookies also help us make sure that the adverts you see online are more relevant to you and your interests.

If you've allowed us to use cookies that support our marketing on social media platforms, it will allow the social media platform provider (such as Facebook) to collect information about you, your device and which of our web pages you have visited. This information allows us to show you relevant products and services on social media platforms.

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. Social media platforms

For certain information we collect about you from social media platforms, we will be a 'joint controller' with the social media platform provider. This means we and the social media platform provider will be jointly responsible for deciding how and why to process your information. This applies, for example, where we collect information about you, such as from your actions on our social media pages or through the social media platform pixels (which are similar to tracking cookies) on our website.

Where we are a joint controller, we have agreed with the social media platform provider to share some responsibilities to protect your personal information by:

- making sure we each have a legal basis (a valid legal reason) for processing your information
- honouring your legal rights relating to your information; and
- making sure your information is secure while it is being processed.

You can contact us to find out more about how we protect your information when we are a joint controller. You can also contact the social media platform provider about what they do or read their privacy notice, which includes details of your legal rights relating to the information the social media platform provider collects and keeps.

We act as joint controllers with Facebook and Instagram.

14. How to contact us

If you have any questions about our privacy notice, go to barclays.co.uk/wealth-management/important.information/privacy-notice or 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/wealth-management/important.information/privacy-notice.

You can contact our Data Protection Officer by writing to:

**The Data Protection Officer
Barclays Bank PLC Leicester
LE87 2BB.**

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

Barclays Bank PLC is the 'data controller' for your personal data. This means they are responsible for deciding how we can use your personal data. For some Wealth Management customers, the data controller is Barclays Investment Solutions Limited.

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 by emailing DPO@Barclays.com.

We are committed to working with you to settle any complaint or concern 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 using their website at <https://ico.org.uk>.

15. 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 data or on you personally, we will give you enough notice to allow you to exercise your rights (for example, to object to the processing).

May 2023



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