



## Barclaycard Business Privacy Notice

### Information we hold about you

This policy applies to information we hold about you. In this policy, 'we', 'us', and 'our' means Barclaycard Commercial Payments, which is a trading name of Barclays Bank PLC, registered number 01026167, registered office 1 Churchill Place, London E14 5HP. 'You' means the person the information relates to.

This policy applies to information held about customers and possible future customers, suppliers and possible future suppliers, contacts and all other people we hold information about. By 'information' we mean personal and financial information about you that we collect, use, share and store. This may include your name, date of birth, address, contact information, financial information, details about your health and lifestyle, employment details and device identifiers including internet protocol (IP) address. It includes information about any other Barclaycard and Barclays products and services (or products and services provided by our partners) you currently have, you've applied for or you've had in the past.

### Where this information comes from

We collect, use, share and store information about you to provide you with the services you have asked us for and to share information with you about services that may be of interest to you.

You may provide this information direct to us, for example by the way you communicate or do business with us, such as:

- applying for our products or services;
- using our branches or telephone services;
- writing to us;
- entering competitions or promotions;
- downloading any of our mobile applications or using our websites or digital services, in which case we may gather information about how you access and use these services, such as your IP address and information about the devices or software you use (we may also make other requests or give you more details about how we use your information, for example, we may ask for your location to help find nearby services);
- giving information to us at any other time, including through social media; and
- using and managing your accounts (we may take information such as the date, amount and currency of payments made to your account).

This information may also come from other organisations or people, such as other Barclays companies, other organisations you have a relationship with, (such as trade bodies you are a member of), credit reference agencies (who may search the Electoral Register), your employer, publicly available databases such as Companies House, fraud prevention agencies, or other organisations. If you do not provide the information that we tell you to, this may mean that we are unable to properly provide you with our services or carry out all our obligations under our agreement with you.

### How we use your information

We collect your information to provide our services to you and to help us develop new and improved products and services to meet our customers' needs. We also use your information for security purposes, to check your identity, for training, and to communicate with you. We may use automated processes whenever we use your information.

Under data protection laws, whenever we process your personal information, we must meet at least one set condition for processing. These conditions are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

Specifically, we and other Barclays companies may use your information for the following purposes and under the following legal bases.

How we use your information	Legal basis
<p>To provide our services to you and to provide and manage your accounts and our relationship with you.</p>	<ul style="list-style-type: none"> <li>• Where necessary to carry out 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 make sure 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>
<p>To give you statements and other information about your account or our relationship with you.</p>	<ul style="list-style-type: none"> <li>• Where necessary to carry out our agreement or to take steps to enter into an agreement with you.</li> <li>• Where the law requires this.</li> </ul>
<p>To handle enquiries and complaints.</p>	<ul style="list-style-type: none"> <li>• Where necessary to carry out 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 make sure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent future complaints.</li> </ul>
<p>To provide our services to you.</p>	<ul style="list-style-type: none"> <li>• Where necessary to carry out our agreement or to take steps to enter into an agreement with you.</li> <li>• Where the law requires this.</li> </ul>
<p>For assessment, testing (including systems tests) and analysis (including credit or behaviour scoring (or both)), statistical, market and product analysis and market research. We may use this information to prepare statistical and other reports to be shared internally or externally with others, including non-Barclays companies. We produce these reports using information about you and our other customers. We will combine information about you and other customers so that information used and shared in this way is never personal and you will never be identifiable from it.</p>	<ul style="list-style-type: none"> <li>• Where the law requires this.</li> <li>• Where it's in our legitimate interests to develop, build, put in place and run business models and systems which protect our business interests and provide our customers with a high standard of service.</li> <li>• Where it's in our legitimate interests, or the legitimate interests of other people or organisations, to allow us or other people or organisations to benefit from receiving or analysing the information.</li> </ul>
<p>To evaluate, develop and improve our services to you and other customers.</p>	<ul style="list-style-type: none"> <li>• Where it's in our legitimate interests to continually evaluate, develop or improve our products as well as the experiences of users of our sites, so that we provide our customers with a high standard of service.</li> </ul>
<p>To protect our business interests and to develop our business strategies.</p>	<ul style="list-style-type: none"> <li>• Where it's in our legitimate interests to protect our people, business and property and to develop our strategies.</li> <li>• Where necessary to carry out our agreement or to take steps to enter into an agreement with you.</li> <li>• Where the law requires this.</li> </ul>

<p>To contact you, by post, phone, text, email and other digital methods.</p> <p>This may be:</p> <ul style="list-style-type: none"> <li>• to help you manage your accounts;</li> <li>• to meet our regulatory obligations; or</li> </ul> <p>if you act as the company administrator, to keep you informed about products and services you hold with us and to send you information about products or services (including those of other companies) which may be of interest to you.</p>	<ul style="list-style-type: none"> <li>• Where the law requires this.</li> <li>• Where we have agreed to contact you in our agreement.</li> <li>• Where the law requires this.</li> <li>• Where you agree.</li> <li>• Where it's in our legitimate interests to share information with you about products or services that may be relevant and beneficial to you. Where we send you marketing messages, you can always tell us if you no longer want to receive them. Please see more information in the 'Contact us' section.</li> </ul>
<p>To collect any debts you owe to us.</p>	<ul style="list-style-type: none"> <li>• Where it's in our legitimate interests to collect any debts you owe us.</li> </ul>
<p>To prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes, and to check your identity.</p>	<ul style="list-style-type: none"> <li>• Where the law requires this.</li> <li>• Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes, and to check your identity in order to protect our business and to keep to any laws that apply to us.</li> <li>• Where we must process your information under the contract for the services you have asked us to provide.</li> </ul>
<p>To assess any application you make, including checking for fraud, money laundering, confirming your identity, and carrying out any other regulatory checks. We may compare your details with the details of countries, organisations and people who sanctions apply to, to decide whether we are prevented from doing business with you or processing a transaction under sanctions law.</p>	<ul style="list-style-type: none"> <li>• Where you have made the information public.</li> <li>• Where it's in our legitimate interests to protect our business interests.</li> <li>• Where the law requires this.</li> </ul>
<p>To monitor, record and analyse any communications between you and us, including phone calls.</p>	<ul style="list-style-type: none"> <li>• Where it's in our legitimate interests, to check your instructions to us, to prevent and detect fraud and other crime, to analyse, assess and improve our services to customers, and for training purposes, to improve the services we provide to our customers and to protect our business interests.</li> </ul>
<p>To transfer your information to or share it with any organisation your account has been or may be transferred to following a (or ready for an expected) restructure, transfer, sale or takeover of all or part of any Barclays company, business, asset or debt.</p>	<ul style="list-style-type: none"> <li>• Where necessary to carry out our agreement.</li> <li>• Where we have a legitimate interest in restructuring, transferring or selling all or part of any Barclays company, business, asset or debt.</li> </ul>
<p>To share your information with UK or other relevant tax authorities, credit reference agencies, fraud prevention agencies, and UK and overseas regulators and authorities.</p>	<ul style="list-style-type: none"> <li>• Where the law requires this.</li> <li>• Where we have a legitimate interest in carrying out certain credit checks so that we can make responsible business decisions. As a responsible organisation, we need to make sure that we only provide certain products to companies and individuals if the products are appropriate, and that we continue to manage the services we provide, for example if we believe that you may have difficulties making a payment to us.</li> <li>• Where we have a legitimate interest in helping to prevent and detect fraud and other crime.</li> </ul> <p>Where we have a legitimate interest in helping UK and overseas regulators who monitor banks to make sure that they work within the law and regulations.</p>

To share your information with our partners and service providers.	<ul style="list-style-type: none"> <li>• Where necessary to carry out our agreement.</li> <li>• Where we have a legitimate interest in using other organisations to provide some services for us or on our behalf.</li> </ul>
To share your information with other people or organisations who you ask us to share your information with.	<ul style="list-style-type: none"> <li>• Where the law requires this.</li> <li>• Where you have provided consent for this.</li> </ul>
To share your information in an encrypted format with social-media companies. They can then match this to personal information they already hold about you so they can display messages to you about our products and services.	<ul style="list-style-type: none"> <li>• Where we have a legitimate interest in using social-media companies to share information with you about our products or services that may be relevant and beneficial to you.</li> </ul>

Data protection law allows us to use personal information for our genuine and legitimate reasons as long as we respect your rights and freedoms. This lawful basis for using your information is called 'legitimate interests'. When we rely on our legitimate interests as the legal basis for processing your personal information for the purposes set out above, we will carefully consider and balance any possible effect this may have on you and your rights.

## Sensitive information

We will occasionally need to use sensitive information about you in the following ways. We will use information about your health if this is relevant for us to help you if you are struggling with a debt, it is relevant to a complaint you are making about us, it is relevant to how you want us to contact you, or it provides us with relevant information about how you are spending your money. We will also use sensitive information about you if this is considered to be in the public interest (for example, to support you if you are a vulnerable customer) or if you agree. We may also check criminal offence data for the purpose of carrying out anti-money laundering, fraud and sanctions checks (see automated decision-making).

## Automated decision-making

If you apply to us for a product, your application will be processed by an automated decision-making process to decide whether you meet our affordability criteria. The automated processes may decline or refer your application based on your credit history and credit score. If your application is referred, this means we will manually review your application before making a final decision. We will then communicate our decision to you and whether our original offer is dependent on additional terms.

We will also carry out automated anti-money-laundering and sanctions checks (which means that your details will be compared with the details of countries, organisations and people who sanctions apply to, to decide whether we are prevented from doing business with you under sanctions law). This means that we may automatically decide that you present a fraud or money-laundering risk if the processing reveals your behaviour to be consistent with money laundering or known fraudulent behaviour, is inconsistent with information you have previously provided, or you appear to have deliberately hidden your true identity.

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

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

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

If you have any questions about this, please contact us using the details set out in the 'Contact us' section.

## Sharing your information with others

We'll keep your information confidential but we may share it in certain circumstances, for the purposes set out in this policy, with:

- your employer or other organisation that asked us to issue the card to you;
- other Barclays companies;
- other companies who provide a service to you, for example if you use our products to make a purchase or payment;
- any company we are providing services with or whose name or logo appears on our products
- our service providers and agents, including their subcontractors;

- other selected businesses so they can send you information about their products and services (as set out in the 'How we use your information' table above). We'll always tell you who we will share your information with before we do this.
- other companies whose products or services we make available to you and which you may want to take up. If we make your information available before you take up another company's products or services (for example, to register you for a new product before you take up the product and accept its terms), we will only transfer the minimum information necessary so you can take up that product or service. We will make sure the other company keeps your information confidential and only uses it for this purpose, and we will make sure that it deletes the information if you do not take up the product or service.
- anyone we transfer or may transfer our rights, and duties to, or we sell or may sell all or part of any Barclays company, business, debts or assets to;
- fraud prevention agencies;
- credit reference agencies;
- companies who help us with verifying information.

The people and organisations listed above will also have to keep it secure and confidential.

We may share limited information (for example, your mobile phone number or email address), in an encrypted format, with social-media companies. The social-media companies can match this to personal information they already hold about you, so that they can display messages to you about our products and services. Before doing this we will always give you the option to tell us if you don't want us to do this.

We may also share your information as follows.

- With UK and overseas regulators and authorities in connection with their duties (such as preventing crime). For example, if you report your card stolen, we may give the police any information we think will be useful. The way certain payments work means the regulator or authority may be able to access payment details (including information about others involved in the payment)
- With any other person or organisation after a (or ready for an expected) restructure, transfer, sale or takeover of all or part of any Barclays company, business, debt or asset, 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)
- If we have a duty to reveal it, if it is needed to manage your accounts, or if a law or regulation allows us to do so for legitimate business purposes or with your permission
- With any person or organisation for the valid investigation of unusual or suspicious activity identified on your account.

## Sharing your information with credit reference and fraud prevention agencies

When processing your application, we will carry out credit and identity checks on you with one or more credit reference agencies. To do this, we will give the credit reference agencies your personal information and they will give us information about you. We will also continue to exchange information about you with credit reference agencies while you have a relationship with us, for example, if we have asked you to pay an amount you owe us and we do not receive a satisfactory reply from you within our stated time limit, or if you give us false or inaccurate information. The credit reference agencies may share your personal information with other organisations, including gambling operators. The credit reference agencies, and the ways in which they use and share personal information, are explained in more detail at [www.experian.co.uk/crain/index.html](http://www.experian.co.uk/crain/index.html). Examples of circumstances when we may share your information or information relating to your partner or other members of your household include when we are:

- checking details on applications for products and services, and credit and
- credit-related, or other, facilities;
- managing credit and credit-related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; and
- making enquiries when you ask for any lending products or investment products and to help us manage your account.

We will share your information with fraud prevention agencies who will use it to prevent fraud and money laundering, and to confirm your identity. We will also share your information with fraud prevention agencies if you give us false or inaccurate information or we suspect fraud. We and fraud prevention agencies may also allow law enforcement agencies to access and use your personal information 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 information for different periods of time, and if you are considered to present a fraud or money-laundering risk, they can hold your information for up to six years.

Here are the web pages for the information notices of the main Fraud Prevention Agencies we use:

CIFAS - <https://www.cifas.org.uk/fpn>

National Hunter - <https://nhunter.co.uk/privacy-policy/>

## Social Media Platforms

If you visit our social media pages or view our content on social media platforms (such as Facebook/Linked-In) both we and the social media platform provider may 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

We will only use this data for legitimate business reasons, such as: user experience/feedback analytics, to respond to your query, training purposes.

## Sharing your information outside the United Kingdom and/or European Economic Area

When we, our third parties or fraud prevention agencies transfer your information outside the United Kingdom and/or European Economic Area (EEA), we and they will:

- make sure that the organisations we transfer your information to apply an equivalent level of protection;
- include conditions in the contract with the organisations receiving your personal information to protect it to the standard required in the European Economic Area and/or the United Kingdom (UK) (as the case may be); and
- possibly ask the organisations receiving your information to subscribe to international frameworks intended to allow information to be shared securely.

If we are transferring your information, we may also transfer it to either a country considered by the European Commission and/or UK data protection authority to provide adequate protection of your information, (or to a different country if you agree to the transfer). If we transfer your information outside the European Economic Area and/or the UK in other circumstances (for example, because we have to reveal the information to help prevent or detect a crime), we'll make sure we share that information lawfully.

You can obtain more details of the protection given to your information when it's transferred outside the EEA by contacting us using the details in the 'Contact us' section below.

## How long we will keep your information

We will keep your information for as long as is needed for the purposes set out above or as required by any laws that apply.

If you close your account, if we refuse your application for an account or product, or you decide not to go ahead with your application for an account or product, we'll still keep your information. We may also continue to collect information from credit-reference agencies to use after your account is closed. We'll do this for as long as we're allowed to for legitimate business purposes, to help prevent fraud and other financial crime, and for other legal and regulatory reasons.

## Your rights

You have rights relating to the way we use your information. You have the right to:

- ask us to send you (or someone you nominate) a copy of the information we hold about you;
- ask us to correct or delete any incorrect or incomplete information we hold about you (we will correct any information we believe is incorrect or incomplete);
- ask us to stop using your information (we will do this if there is no legal reason for us to continue to hold or use that information);
- object to any automated decision-making;
- ask us to transfer certain personal information to you or to another organisation, including service providers, in a format they can use where this is technically possible (known as the 'right to data portability'); • withdraw any permission you have previously given to allow us to use your information; and
- ask us to stop or start sending you marketing messages at any time by:
  - calling us on **0800 008 008**; or
  - writing to us at Barclaycard Commercial, Dept BMCM, 1234 Pavilion Drive, Northampton NN4 7SG.

To use any of the rights set out above, or to discuss any other issue relating to your information, please contact us using the methods set out in the 'Contact us' section.

If you have any concerns about the way we use your information, you have the right to complain to the Information Commissioner's Office, which regulates the use of personal information in the UK, by calling **0303 123 1113**. Or you can visit their website at [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/).

We may make changes to this notice and how we use your information in the future. If we do this, we'll post an updated version of this notice on our website. You can find the current version of this notice, which explains how we'll use your information, by visiting our website at [www.barclaycard.co.uk/business](http://www.barclaycard.co.uk/business).

## Contact us

Please go to [barclays.co.uk/control-your-data](http://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 you want to exercise them, please send a request through our website at [barclays.co.uk/control-your-data](http://barclays.co.uk/control-your-data).

You can contact our data protection officer at: The Data Protection Officer, Leicester, LE87 2BB or [DPO@Barclays.com](mailto:DPO@Barclays.com).

If you are an EU citizen or Regulator, for the purposes of GDPR, our Appointed Representative is Barclays Bank Ireland PLC. The Appointed Representative can be contacted via Our Data Protection Officer email address.

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**This information is also available in large print, Braille and audio format by calling 0800 008 008.\***

\*Calls to 0800 numbers are free from UK landlines and personal mobiles, otherwise call charges may apply. Calls to 03 numbers use free plan minutes if available, otherwise they cost the same as calls to 01/02 prefix numbers. International calls will be charged at a higher rate. Please check with your service provider. Calls may be monitored or recorded in order to maintain high levels of security and quality of service.

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