

## **Barclays Privacy Notice - Asia Pacific**

### **1. Introduction**

- 1.1 Barclays PLC (hereafter “**Barclays**”, “**we**” or “**us**”) is committed to safeguarding personal data we collect and process in connection with our business, in compliance with applicable legal data protection requirements.
- 1.2 This Privacy Notice describes the purposes for which we may collect and process personal data, specifies the categories of personal data concerned and explains how we may process and disclose it. In this Privacy Notice, **client, you or your** means a prospective, existing or former corporate or investment banking client entity or an India PB&OS client to whom this notice applies.
- 1.3 We may request certain personal data about the legal representatives, directors, authorised personnel of the client, beneficial owners, trustees, fund managers, partners, other associates of, or persons exercising control over the clients we do business with (**Relevant Individuals**). We may be required to contact you, whether to notify you of, obtain consent about, or otherwise with regard to, our collection and processing of personal data in connection with our regulatory and legal obligations, including those relating to the on-boarding of clients.

### **2. Personal data we collect**

- 2.1 We may collect information in respect of Relevant Individuals, including financial, personal and other information that uniquely identifies Relevant Individuals, when on-boarding new clients and to provide services to clients. The personal data we collect may include details of a Relevant Individual’s name, residential address, date or place of birth, unique identification number(s) such as tax identification or equivalent number(s), background information (which may include demographic data relating to education, career, family or financial background) telephone number, email address or other contact details, information about their place of work and position, title, information generated in the ordinary course of a banking/financial relationship with us, or any other information from which the Relevant Individual can be identified, whether in electronic form or otherwise. We collect most of this information directly from corporate representatives within your organisation acting on your behalf; however, we may also collect information from publicly available resources, and receive or derive information in the course of our relationship with you.
- 2.2 **You must ensure that your Relevant Individuals are made aware by you of the scope of and purposes for which, we will collect and process their personal data and how it will be collected and processed as described in this notice. Whenever you or a corporate representative within your organisation provide us with personal information about a Relevant Individual, you warrant that you have obtained any necessary consents or are otherwise entitled to provide this information to us and for it to be processed by us as described in this notice and that to the best of your knowledge, the personal data is correct and current. It is your responsibility to ensure that the personal data provided to us is accurate and to inform us of any change.**

### **3. Purposes of use**

- 3.1 The use of Relevant Individuals’ personal data is incidental to our dealings with the clients they represent and, subject to applicable laws and regulations, includes dealing with relevant authorised persons of such clients in respect of the following permitted business activities performed by Barclays:
  - (a) Soliciting and selling, and providing information about services, securities and financial instruments and financial transactions;
  - (b) Receiving and processing applications for financial instruments or services such as account opening forms to trade financial instruments;
  - (c) Conducting regulatory checks or other work that Barclays is required to complete pursuant to any legal or regulatory requirements or Barclays policy;
  - (d) Offering or providing information about instruments and services of Barclays and its

- affiliates and partners;
- (e) Determining the appropriateness of financial instruments, services, etc. to be offered in light of the suitability principle or other requirements and performing our global and local KYC (Know Your Customer) and AML (Anti Money Laundering) obligations in relation to Relevant Individuals;
- (f) Confirming in accordance with relevant laws and regulations that a client acts as principal or as agent for the principal, or confirming the qualifications and other requirements that a client must satisfy to use financial instruments, services, etc.;
- (g) Reporting trade results, asset balances, etc. to clients;
- (h) Measuring or reporting business performance and/or forecasting future budget or performance;
- (i) Obtaining necessary business or credit approvals for transactions with clients;
- (j) Performing administrative tasks related to transactions with clients, including responding to client inquiries;
- (k) Studying and developing financial instruments and services through market research, data analysis, questionnaires, etc.;
- (l) Where all or part of the personal data processing is outsourced by other business operators, etc., performing such outsourced services appropriately or, ensuring that there are commensurate controls implemented by outsourced services providers to protect personal data;
- (m) Exercising rights and performing our obligations under any contracts with clients;
- (n) Complying with our obligations under any applicable law or regulation and in particular those governing the financial sector;
- (o) Maintaining contact information to ensure accurate and appropriate contact with clients;
- (p) Sending messages relevant to our relationship with you, including greeting cards or providing information about seminars, receptions, events, etc. (but see paragraph 4 below);
- (q) Offering financial instruments, services, soliciting or selling products and services, etc. to you by sending direct mail or by other means to authorised persons (in accordance with paragraph 4 below);
- (r) Telling you about our products and services by sharing information of the Relevant Individuals (for example, corporate email addresses), in a secure format, with social media and third-party digital platforms (in accordance with paragraph 5);
- (s) Cancelling transactions or managing the paperwork and process after transactions are cancelled;
- (t) Ensuring appropriate and smooth execution of transactions with clients;
- (u) Helping prevent fraud and other financial and other crimes;
- (v) Administering clients' accounts (including identifying and verifying the identity of Relevant Individuals), developing our services to our clients, for assessment, testing (including system tests) and analysis, capturing and managing risks and internal controls; and
- (w) For compliance with our legal and regulatory obligations.

3.2 We may also record any communications between you or your corporate representatives and us including telephone calls and/or video recordings. We will use these recordings to check your instructions to us, for identification, investigation, regulatory, fraud prevention, training and quality purposes and to analyse, assess and improve our services. For security and to prevent and detect crime we may use CCTV in and around our premises to monitor and collect images or voice recordings (or both).

3.3 To the extent required by applicable law or regulation or where required for the conduct of business, we will notify you and obtain your prior consent (directly or via your corporate representative(s)) if we need to collect additional personal data or process personal data for further purposes not set out above.

3.4 Our products and/or services may not be made available to you before we collect, store and use the personal data that we collect. If you do not provide the relevant information in respect of Relevant Individuals, you may not be able to benefit from the products and/or services we provide.

#### **4. Marketing**

- 4.1 We may, with their prior specific consent where required, use Relevant Individuals' contact information to send you marketing communication, including using this information to invite Relevant Individuals to seminars, events, etc. that we consider to be relevant to you. We do not use personal data to market to, or send marketing communications to, Relevant Individuals in their personal capacity.
- 4.2 Relevant Individuals can contact us (see paragraph 8.3) at any time if they would like to opt out of receiving such communications and we shall process their request within a reasonable timeframe.

#### **5. Sharing your data with social media and third-party digital platforms**

- 5.1 **Relevant Individuals' email address may be shared, in a secure format, with social media and third-party digital platforms so they can provide you with content about Barclays products and services. In such instance, the use of the information may also be subject to the privacy policy of the relevant platforms.**
- 5.2 **If Relevant Individuals do not want us to share their personal information with social media and third-party digital platforms for this purpose, they can tell us not to.**
- 5.3 **The social media and third-party digital platforms this applies to are LinkedIn and Google.**

#### **6. Disclosure and retention of your information**

- 6.1 Subject to the retention requirements, as set out in applicable law and regulations, we will keep personal data for only as long as necessary (Section 3).
- 6.2 We will keep personal data confidential. We may only share it with the following (who are also bound to keep it secure and confidential and have a need to know), if we have a legal or regulatory duty to disclose it, if it is necessary for the purposes described in Section 3 and in particular for the management of your accounts or the provision of services to you, if it is required for us to obtain IT support, storage or back up services which are necessary to carry on our activity and/or to comply with our legal and regulatory obligations (e.g. our KYC (Know Your Customer) and AML (Anti Money Laundering) obligations) or in order to protect, exert or defend our rights before courts or regulators and obtain legal advice or to help prevent fraud and other financial crime:
- other companies within the Barclays Group;
  - our suppliers (service providers and sub-contractors), professional advisors and/or companies or organisations acting as our agents;
  - companies and/or intermediaries we may deal with in the course of processing transactions;
  - any party to whom we may transfer our rights and/or obligations, or any third party as a result of any restructure, sale or acquisition of any company within the Barclays Group, on the basis that the recipient is notified to use your information and personal data for the same purpose as it was original supplied to us and/or used by us.
- 6.3 If we have reason to think that you or any Relevant Individual is/are required to report your income or are subject to tax in another country, we may have to share information about you, your accounts, such Relevant Individual or any accounts of such Relevant Individuals held with Barclays with the relevant tax authorities, either directly or via the local tax authority who may share that information with the appropriate tax authorities abroad.
- 6.4 We may also share personal data if (i) we have a duty to do so, based on a legal or regulatory requirement, an order of a court of law, at the request of a regulatory or supervisory authority or any other form of legal compulsion, including sharing information with any governmental agencies, regulatory authorities and other external authorities including, without limitation, an exchange, market, clearing house or clearing and settlement facility, the police and other law enforcement

agency or authority which requests or requires the provision of the information to it, in the proper exercise of their duties (such as crime prevention and/or the regulation, supervision, monitoring or enforcement of a market, a clearing house or clearing and settlement facility) or if (ii) the public interest, or our terms and conditions allow us to do so.

## **7. Overseas Disclosure of information**

- 7.1 The aforementioned affiliates and suppliers of Barclays, and authorities, might be located onshore or overseas. We will take in any case contractual and/or technical, organisational and physical security measures as applicable to provide to the transferred personal data the level of protection required under relevant legislation.
- 7.2 We will ensure that applicable contractual and/or other suitable safeguards are in place before personal data is transferred to other jurisdictions or parties, in particular when we outsource any processes and, where this is not possible (for example, because we are required by law or court order to disclose the information to a public authority or court), we will ensure that the purpose and scope of the sharing is lawful.
- 7.3 Personal data of Relevant Individuals may be processed, used, stored and/or transferred internationally for the purposes described herein in the jurisdictions where the relevant Barclays Group company permitted to receive personal data as described above is located. You may request a list of location in which our affiliates, entity within the Barclays group of companies and/or suppliers stores or process your personal data.

## **8. Security measures**

- 8.1 We carefully safeguard the personal data and other information we hold. We will ensure that appropriate physical and technological security measures are implemented to protect personal data. This includes compliance with regulatory requirements, our local and global information technology and security policies, and measures and policies to safeguard the personal data we hold and process. We also ensure that third parties acting on our behalf, including our affiliates and suppliers, implement such controls and measures.
- 8.2 Use of the Internet cannot be guaranteed to be completely secure without risk of leakage or loss of, or damage to, personal information. However, in accordance with applicable regulatory requirements and our own policies, we will take responsibility if the personal data collected by us suffers from unauthorised access, disclosure or other damage for a reason attributable to our activities and that results in impairment of an individual's lawful rights and interests.

## **9. Managing your information**

- 9.1 To ensure proper handling of personal data, we will review this Privacy Notice from time to time and may notify you of any changes accordingly, whether online via an electronic medium or otherwise. You can find the most up-to-date Privacy Notice by accessing <https://www.investmentbank.barclays.com/disclosures/personal-information-use.html> for our Investment Bank clients and <https://www.barclayscorporate.com/general-info/privacy-and-cookies.html> for our Corporate Bank clients and <https://www.barclays.in/home/privacy-policy/> for India PB&OS clients.
- 9.2 Relevant Individuals have a right, inter alia, to request access to the personal data we hold about them, to seek correction or deletion of their information, to express concerns or lodge a complaint in relation to the processing of their personal data by Barclays.
- 9.3 Relevant Individuals can assert these rights at any time provided that they send us a copy of an ID with their request and comply with any other applicable requirements under law or regulation. We may charge a fee for access requests as permitted under relevant legislation or regulation.
- 9.4 If you have any questions or comments about the Privacy Notice, please contact the Data protection

Officer whose contact details can be found [here](#) to address any concerns, complaints or any access, correction or other requests of Relevant Individuals in respect of the personal data we hold about them. Alternatively, any grievances about our processing of personal data with respect to our customers in China can be raised with the PBOC Financial Consumer Protection Consulting and Complaints Hotline on 12363 (website). Please ensure that these are communicated to the Relevant Individuals.

This notice was last updated on 16 February 2024.