



# Barclays Bank plc (South Africa) PAIA Manual

Last updated: May 2021

## 1. Legal entity details

### Entity names and trading names.

Location	Legal entity	Registered Office Address	Company Registration Number	Controller or Processor	Employing entity	Businesses included
UK	Barclays Bank PLC	1 Churchill Place, London, E14 5HP	01026167	Controller	Yes	Corporate Banking Investment Bank Private Bank
UK	Barclays Services Ltd	1 Churchill Place, London E14 5HP	01767980	Controller	Yes	Functional Support Services
SA	Barclays Bank PLC representative office	5th Floor, Building 3, 11 Alice Lane, Sandton, Johannesburg, 2196	2018/599243/10	Controller		Corporate Banking Investment Bank Private Bank

<b>Registered office &amp; trading addresses</b>	See table above
<b>Company Numbers</b>	See table above
<b>Representation details</b> Information Officer / Deputy Information Officer	<a href="mailto:InfoOfficerSA@barclays.com">InfoOfficerSA@barclays.com</a>
<b>Employing entity</b>	See table above

### Processors

Where a processor within the Barclays Group is acting on behalf of a controller within the Barclays Group, it may process personal data on behalf of the controller in support of any of the purposes detailed in the Description of Processing below. Processors within the Barclays Group employ the same technical and organisational security measures as those employed by the controllers, and the same safeguards for data transfers.

## General business description

Barclays Bank PLC South Africa is a representative office facilitating banking services for Corporate Bank, Private Bank and Investment Bank clients and processing personal data for the purposes below.

### 1. Corporate Banking

Corporate Banking supports clients with an annual turnover of over £6.5 million, and large local companies, financial institutions and multinationals in non-UK markets. The client base is institutional.

Customer Privacy Notice

<https://www.barclayscorporate.com/general-info/customer-privacy-notice/>

Regulatory Information Guides

<http://home.barclays.intranet/sites/CBProducts/Client-Onboarding/Pages/Global-Documentation-Library.aspx>

### 2. Investment Bank

The Investment Bank provides advice, financing and risk management solutions to companies, governments and institutions worldwide. The client base is institutional.

Client Privacy Notice

<https://www.investmentbank.barclays.com/disclosures/personal-information-use.html>

### 3. Private Bank

Private Bank ("PB") offers local, international and private banking and wealth and investment management services to individuals and institutions. This includes niche investment products, analytics and consulting services; sales and trading; strategic solutions such as structured/hedging products; wealth advisory; family office banking. The client base is both personal and institutional.

Client Privacy Notice

<https://international.barclays.com/important-information/privacy-policy/full-privacy-notice/>

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## 2. General description of technical and security measures

Barclays has introduced and established a range of internal policies, standards, procedures and controls under the functional areas below in order to ensure that appropriate protection is provided for personal data:

- Privacy
- Information Security & Cyber
- Sourcing & Supplier Management
- Physical Security
- People Screening & Employee Monitoring
- Incident Management

Barclays' policies, standards and procedures are supported by technological and organisational controls, monitoring and testing, assurance and audit, and training and awareness.

Personal data is retained and then destroyed in accordance with Barclays' Records Retention Schedules.

Information on controls Barclays requires third parties to adhere to can be found here:

<https://home.barclays/who-we-are/our-suppliers/our-requirements-of-external-suppliers/external-supplier-control-obligations/>

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### 3. Description of processing

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: HR/Staff administration and management* *For employing entities only, as per the legal entity list	
<b>Categories of Data Subjects</b>	Staff (including applicants, candidates, existing and former staff, contractors and pension members) and persons nominated by candidates or staff (including connected and related persons, emergency contacts, references contacts, brokers)	
<b>Data processed</b>	Name Gender and Title Addresses Country of Residence Telephone and Fax Numbers Email Addresses Identification Data Date and Place of Birth Nationality Family Marital Status Curriculum Vitae Information (e.g. hobbies/interests, references) Employment Details Connected and Related Persons Pension Details Financial Data Insurance Details Tax Information Sales Data	Correspondence (e.g. email) Complaint Information Transaction Information Disciplinary, Capability and Grievance Information IP address Location Data Electronic Traffic Data Images Voice Recordings Gifts and Entertainment Details Background Information/Sanction Data Dietary/Special Requirements Medical Data/Sickness/Disability Race/Ethnicity Religion/Beliefs Sexual Orientation Union Membership Biometric Data
<b>Categories of Recipients</b>	Categories of recipients described in the Global Fair Processing Notice for Staff Personal Information. Employees of the controller Other Barclays companies Regulatory and statutory bodies (where local law permits) Anyone to whom we may transfer our rights and duties (e.g. following the sale or restructuring of a part of the Barclays business) Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List Third parties who provide benefits or services to staff, such as pension scheme, healthcare and redundancy support providers	
<b>Description of processing &amp; lawful basis</b>	Recruitment and Job Applications HR Administration and Management Global Directories Administration and Management Planning and Work Organisation Absence, Sickness and Maternity Administration Mobility (e.g. travel, secondments, transfers, relocation) Remuneration and Payroll Benefits and Reward Administration and Management, (e.g. car scheme administration and share	scheme administration) Pension Administration and Fund Management Performance Assessment and Management Learning, Training and Development Workplace and Event Management Company Asset Management and Protection Expenses Management Travel Management HR Dispute Management (including disciplinary, capability and grievance) Transaction Management and Monitoring Marketing
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.	
<b>Applicable retention period</b>	Personal data retained in accordance with the Barclays Records Retention Schedules.	

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Customer and client administration	
<b>Categories of Data Subjects</b>	Prospective, existing and former customers including connected and related persons	
<b>Data processed</b>	Name Gender and Title Addresses Country of Residence Telephone and Fax Numbers Email Addresses Identification Data Date and Place of Birth Nationality Family Connected and Related Persons Customer Account Information Customer Business Information Customer Employment Details Transaction Information Financial Data Insurance Details Tax Information Date of Death	Will Information Fraud Indicator Correspondence (e.g. email) Complaint Information IP address Location Data Images Voice Recordings Hobbies/Interests Gifts and Entertainment Details Background Information Sanction Data Marital Status Race/Ethnicity* Religion/Beliefs* Dietary/Special Requirements* Medical Data/Sickness/Disability* * By exception and where a condition for processing the data is satisfied
<b>Categories of Recipients</b>	Employees of the controller Other Barclays companies Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List Our customers’ professional and financial advisors and agents Fraud prevention agencies and credit reference agencies Acquirers or potential acquirers of the business or of customer accounts, in the event of the sale of any part of the business or account Other financial services providers (e.g. pensions or insurance providers), where Barclays is acting as an introducer on behalf of the client Regulatory and statutory bodies (where local law permits)	
<b>Description of processing &amp; lawful basis</b>	Prospective and New Customer Management Application Checks (KYC) including Anti Money Laundering (AML) checks Customer Administration and Management (including relationship management) Account Administration and Management (including opening and servicing of bank accounts, credit cards, checks, deposits, loans, credits, debts, insurance, safe deposits, mortgages, wealth, investments, hedge funds,	funds and any other products and/or services provided to customers) Transaction Processing, Monitoring, Verification and Analysis Credit Risk Review and Management Debt Collection and Recoveries Marketing and Prospecting Development/Improvement of Products and Services and Market Analysis Legal and Dispute Management
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.	
<b>Applicable retention period</b>	Personal data is retained in accordance with the Barclays Records Retention Schedules.	

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Access control & security management
<b>Categories of Data Subjects</b>	Employees, customers, or members of the public as visitors
<b>Data processed</b>	CCTV images Staff ID numbers Electronic Traffic Data Voice Recordings
<b>Categories of Recipients</b>	Not generally disclosed outside Barclays Group except for law enforcement purposes
<b>Description of processing &amp; lawful basis</b>	CCTV & staff monitoring Identification and Verification Screening Insider Threat Monitoring Data Security
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies.  Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used.  The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	Personal data is retained in accordance with the Barclays Records Retention Schedules & statutory requirements

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Providing financial and investments advice* *(for Private Bank only)	
<b>Categories of Data Subjects</b>	Prospective, existing and former customers including connected and related persons	
<b>Data processed</b>	Name Gender and Title Addresses Country of Residence Telephone and Fax Numbers Email Addresses Identification Data Date and Place of Birth Nationality Family Connected and Related Persons Customer Account Information Customer Business Information Customer Employment Details Transaction Information Financial Data Insurance Details Tax Information Date of Death	Will Information Fraud Indicator Correspondence (e.g. email) Complaint Information IP address Location Data Images Voice Recordings Hobbies/Interests Gifts and Entertainment Details Background Information Sanction Data Marital Status Race/Ethnicity* Religion/Beliefs * Dietary/Special Requirements* Medical Data/Sickness/Disability* *By exception and where a condition for processing the data is satisfied
<b>Categories of Recipients</b>	Employees of the controller Other Barclays companies Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List Our customers' professional and financial advisors and agents Fraud prevention agencies and credit reference agencies Acquirers or potential acquirers of the business or of customer accounts, in the event of the sale of any part of the business or account Other financial services providers (e.g. pensions or insurance providers), where Barclays is acting as an introducer on behalf of the client Regulatory and statutory bodies (where local law permits)	
<b>Description of processing &amp; lawful basis</b>	Wealth and investment management and advice	
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies.  Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used.  The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.	
<b>Applicable retention period</b>	Personal data retained in accordance with the Barclays Records Retention Schedules.	

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Purchaser and supplier administration
<b>Categories of Data Subjects</b>	Individual customers and clients Supplier relationship managers and business contacts
<b>Data processed</b>	Job title and business contact details Financial account information
<b>Categories of Recipients</b>	Other companies in the same group Services providers and agents processing on our behalf
<b>Description of processing &amp; lawful basis</b>	Supplier Management Stock Management Development/Improvement of Products and Services Market Analysis Billing, accounts and financial records
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	Generally retained for the life of the customer relationship per product + 6 years. There will be some exceptions, e.g. transactional data will be held for 6 years after the completion of the transaction

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Advertising, marketing and public relations
<b>Categories of Data Subjects</b>	Prospective, existing and former customers including connected and related persons
<b>Data processed</b>	Title, gender and name Home address and contact information Financial account information Job title and professional contact information Dietary and accessibility requirements (if applicable and required for events management)
<b>Categories of Recipients</b>	Employees of the controller Other Barclays companies Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List Events management companies (where necessary for an event e.g. attendee/delegate list)
<b>Description of processing &amp; lawful basis</b>	Marketing and Prospecting Complaint/Query Management Event and sponsorship management Data aggregation & customer profiling
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	Personal data retained in accordance with the Barclays Records Retention Schedules.

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Management information and reporting
<b>Categories of Data Subjects</b>	Management Information and Reporting may be produced about any category of data subject described in this Record of Processing. Individual data subjects are unlikely to be identified within final reports, though it remains possible.
<b>Data processed</b>	Management Information and Reporting may be produced using any categories of data processed that is described within this Record of Processing.
<b>Categories of Recipients</b>	Employees of the controller Other Barclays companies Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List Regulatory and statutory bodies (where local law permits)
<b>Description of processing &amp; lawful basis</b>	Statistical Reports and Analytics Quality Control and Process Monitoring Project Management Facilities Management
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	Personal data retained in accordance with the Barclays Records Retention Schedules.

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Legal & regulatory compliance
<b>Categories of Data Subjects</b>	Permanent and temporary employees Professional advisers and consultants Individual customers and clients
<b>Data processed</b>	Name and contact information Employee relatives / friends Policy breach information Criminal records
<b>Categories of Recipients</b>	Other companies within the Barclays Group Not generally disclosed outside Barclays Group Disclosed to competent authorities to meet regulatory requirements.
<b>Description of processing &amp; lawful basis</b>	Financial Crime Conflict of Interests Monitoring Whistleblowing Audit, Monitoring, Assurance Checks and Testing Employment details Licencing/registration details Complaint information Gifts and Entertainment Details
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies. Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used. The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	Personal data is retained in accordance with the Barclays Records Retention Schedules & statutory requirements

<b>Reasons/purposes for processing and our lawful basis for processing</b>	Purpose: Directories administration & management
<b>Categories of Data Subjects</b>	Barclays employees (permanent, temporary and contract staff)
<b>Data processed</b>	Name and internal contact information (office/desk location, telephone numbers and Barclays email address) Job title and reporting line Photograph Personal email address and telephone numbers (for Business Continuity Management/ Disaster Recovery purposes)
<b>Categories of Recipients</b>	All Barclays' employees globally that have access to the intranet (the personal/out of hours contact information is not published, and is only available to Business Continuity Management team) Our service providers and agents – details of our key suppliers are available on the Global Managed Supplier List
<b>Description of processing &amp; lawful basis</b>	Phone book
<b>Transfers outside of South Africa</b>	For South African resident clients, their personal data will be hosted in the UK and its Crown Dependencies.  Global transfers of data are possible where there is a business requirement to do so, and where globally accessible systems are used, and / or where internal data processors are used.  The key Barclays locations outside of the UK and South Africa for centralised services and internal data processors are India, Ireland, Singapore and the USA.
<b>Applicable retention period</b>	For the life of the employee relationship – when an employee leaves Barclays his or her data is removed from the Phone Book.