

Barclays PLC
Registered Shareholder's
Privacy Policy



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Introduction

We are committed to protecting the information we hold about you. This Privacy Policy describes how, when and why we, Barclays PLC (“Barclays” or “we”), may use your information, as well as your rights in relation to this information.

This Privacy Policy extends to the share registry services which are carried out by Equiniti Group plc (Equiniti) on behalf of Barclays. Under the rules of the Companies Act, we have appointed Equiniti to manage our register of ordinary shares. Equiniti’s role as Registrar includes keeping an up-to-date record of shares held by shareholders, administration of shareholder payments managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Equiniti processes personal information about you as a shareholder on our behalf.

This Privacy Policy gives you details about:

- what personal information we use in relation to registered shareholders, what we use this information for and the legal basis for doing so;
- how we collect, use and share personal information within Barclays and with our business partners;
- your rights in relation to any personal information we hold about you; and
- how to contact us.

If you are also a Barclays customer, you should refer to the separate privacy policies which govern the personal information which we collect from you in relation to the Barclays products or services you take as a customer.

If you use any of the engagement tools that we make available to shareholders (for example the Equiniti Investor Centre, Share Dealing Site, Proxy Voting Site and Employee Share Plans Site) (“Online Services”), you should be aware of the additional privacy notices that relate to the relevant Online Service. This Privacy Policy supplements, but does not override, those notices.

We will amend this Privacy Policy from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this Privacy Policy.

What personal information we collect when you become a registered shareholder

Barclays will collect and use personal information when you supply details either directly or through your agent, stockbroker or share plan administrator. We also collect your personal information when you register or use any of our Online Services or our website. Personal information includes the following:

- personal details (e.g. name, passport information or other identification information);
- contact details (e.g. phone number, email address, postal address or mobile number);
- details of categories and classes of shares you hold;
- details about any disability you may have if you have told us about it in order to deliver services to you (for example if you opt to receive your shareholder documents in alternative/ accessible formats);
- information about votes you cast and the Reference Number given to you by us as a Barclays shareholder;
- any personal details that you provide to us through your communications with us;
- your bank or building society account details where you have provided these for the purpose of receipt of dividend payments; and
- a record of your attendance at our general meetings.

We may use cookies and similar technologies on our websites. Cookies are text files that gather small amounts of information, which your computer or mobile devices stores when you visit a website. When you return to the website, or visit websites that use the same cookies, they recognise these cookies and so your device.

We use cookies and similar technologies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your online experience. They can also help to make sure that the ads you see online are more relevant to you and your interests.

The terms and conditions of our websites give you more information on cookies, how and where we use them, and how you can control them.

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. The table below sets out what we use your personal data for and our legal basis for doing so.

What we use your information for	The legal basis for doing so
To manage your shareholder interest in Barclays	<ul style="list-style-type: none"> ▪ Where necessary to comply with the law ▪ Where necessary to manage your shareholder rights and our obligations to you as a shareholder in accordance with our Articles of Association and applicable laws ▪ It is in our legitimate interests to make sure that the services provided to you as a shareholder are well managed in accordance with applicable laws and regulations
To check your identity and the validity of documents in order to keep the shareholder register up-to-date	<ul style="list-style-type: none"> ▪ Where necessary to manage your shareholder rights and our obligations to you as a shareholder in accordance with our Articles of Association and applicable laws ▪ Where necessary to comply with the law ▪ It is in our legitimate interests to check your identity and the validity of your documents so we can protect our business and keep to laws that apply to us
To allow you to exercise your rights as a shareholder in accordance with our Articles of Association and applicable laws	<ul style="list-style-type: none"> ▪ Where necessary to comply with the law ▪ Where necessary to manage your shareholder rights and our obligations to you as a shareholder in accordance with our Articles of Association and applicable laws
To communicate with you about shareholder related information for legal, regulatory and servicing purposes. This includes information on shareholder payments, shareholder resolutions, the annual report and accounts, Notice of our AGM and any other relevant information that relates to your Barclays shareholding	<ul style="list-style-type: none"> ▪ Where necessary to manage your shareholder rights and our obligations to you as a shareholder in accordance with our Articles of Association and applicable laws ▪ Where necessary to comply with the law
To address any queries or complaints you raise with us as a shareholder	<ul style="list-style-type: none"> ▪ It is in our legitimate interests to make sure that your queries or complaints are investigated (for example, so that our shareholders receive a high standard of service and we can prevent complaints from arising in the future)
To meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities	<ul style="list-style-type: none"> ▪ Where necessary to comply with the law

Who we will share your personal 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) who work with us to help deliver our services, in order to fulfil our legal obligations or at your request, under the following circumstances:

- third parties who act as our Registrar and who manage our share register, such as Equiniti;
- other members of Barclays Group as necessary to operate our business (for example, to provide you with services, for internal reporting and where those companies provide services to us);
- other financial institutions who you ask us to deal with;
- our service providers and agents (including their sub-contractors);
- your advisers (such as 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 on your behalf (such as under a power of attorney);
- UK and overseas regulators, law enforcement agencies and authorities in connection with their duties;
- Any third party after a restructure, sale or acquisition of any Barclays company, as long as that person uses your information for the same purposes you originally provided it for;
- Anyone we transfer or delegate our rights or obligations to, as allows under terms and conditions of any agreement you have with us (e.g. if we transfer the management of our share register to another service provider).

Retention of your data

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data as set out above, or as required by any laws that apply.

We do keep certain records – which may include personal information – for more extended periods e.g. after you have sold your shareholding, if we need to do this to meet legal, regulatory, tax or accounting requirements. We are required to retain an accurate record of your dealings with us, so we can respond to any complaints or challenges from you or others which might be raised later. We will also retain files if we reasonably believe there is a prospect of litigation.

We will then either securely delete it or anonymise it so that it cannot be linked back to you. We review our retention periods for personal data on a regular basis.

International data transfer

When we share information with organisations in another jurisdiction, we will ensure they agree to apply equivalent levels of protection for personal data as we do. If this is not possible – for example because we are required by law to disclose information – we will ensure the sharing of that information is lawful. Also, if they are not in a jurisdiction that the European Commission regards as having adequate levels of protections for personal data, we will put in place appropriate safeguards (such as contractual commitments), in accordance with applicable legal requirements, to ensure that your data is adequately protected.

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 your 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 in the following ways:

- to correct your personal data, please contact the Registrar (Equiniti) in the first instance if any personal data relating to your shareholding (including name, address or dividend mandate details) is incorrect;
- to change your voting preferences or mailing preferences, please contact the Registrar (Equiniti) in the first instance;
- in all other circumstances, see the 'How to contact us' section.

You have legal rights under data protection laws in relation to your personal information. We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

How to contact us

If you would like to contact the Registrar (Equiniti) you can telephone 0371 384 2055 (in the UK) or +44 121 415 7004 (from overseas) or write to:

Equiniti
Aspect House
Spencer Road
Lancing
West Sussex
BN99 6DA

If you have any questions about our Privacy Policy or if you would like more information on your rights, or want to exercise them, you can send an email to DPO@Barclays.com or write to:

The Data Protection Officer
Barclays PLC
Leicester
LE87 2BB

Barclays PLC is the 'data controller' for your personal data. This means it is responsible for deciding how we can use your personal data.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the United Kingdom using their website – <https://ico.org.uk>.

