

Privacy Notice

WHO WE ARE

The Rag – Army & Navy Club is a prestigious private club that welcomes members from around the globe, from all walks of life and from both military and non-military backgrounds.

References in this Privacy Notice to “The Rag”, “Army & Navy Club”, “the Club” “we”, “us” or “our” mean the The Rag – Army & Navy Club, a ‘Private company limited by guarantee’ registration no: 08499108 and a charity registered in England and Wales (No: 206646). Our registered office is Army & Navy Club, 36-39 Pall Mall, London, SW1Y 5JN.

We are the “data controller” for the purposes of the Data Protection Act 2018 and the UK GDPR and we are registered with the Information Commissioner’s Office, registration number: ZA033854. The Club has a designated Data Protection Manager who can be contacted via: club@therag.co.uk.

We collect and process personal data relating to our members and those interested in membership, to effectively provide membership-related services. We are committed to meeting the requirements of data protection legislation, and to respecting and protecting the personal data we hold. Accordingly, this Privacy Notice describes how and why we use personal data and provides information about your data subject rights. It applies to personal data provided to us by you, the data subject, and by others.

We may use the personal data provided to us for the purposes described in this Privacy Notice or as made clear in other ways when we collect your personal data.

WHAT IS PERSONAL DATA?

Personal data

In this Privacy Notice, the term ‘personal data’, means information that allows us to identify you either directly, or in combination with any other information we may hold.

The ‘processing’ of personal data means any operations performed on personal data, including (but not limited to) the collection, recording, organising, storing, erasing, destroying, restricting, altering or disclosing of data.

Special Category Personal Data

The UK GDPR defines special category personal data as information about a person's race and ethnicity, religious or philosophical beliefs, trade union memberships, political opinions, genetic data, biometric and health data, and information concerning a natural person's sex life or sexual orientation.

Criminal Offence data

Criminal offence data is data relating to criminal convictions and allegations of criminal activity. This includes information disclosed by the Disclosure and Barring Service (DBS) under the Government's employment vetting scheme.

PROCESSING YOUR PERSONAL DATA

Information collected by the Club

The personal data we collect is provided either directly from you or from a third-party acting on your behalf. Where we receive your personal data from a third-party, we may make you aware of the details provided and the identity of the third-party that provided your information to us. Where necessary, we will draw your attention to this Privacy Notice.

We also collect personal data from you when you use our services, such as your booking history, any preferences communicated to us, events attendance and CCTV images. Please refer to the **CCTV Policy** below if you have any CCTV queries, or contact us using any of the methods shown in the '[How to contact us](#)' section below.

Children: Club members must be at least 18 years old and consequently the Club does not seek to collect the personal data of children. Should it do so, for example, in relation to a child attending an event, or staying at the Club, it will process that information with the consent of a parent or a person with parental responsibility.

In the course of providing our services to you, we may incidentally collect health information from you from time to time – this will only be collected with your explicit permission and at your direction. For example, you may provide health information to us for accessibility or dietary purposes. As this may qualify as special category data, we will only ever use that health data for the purpose for which it was provided.

Criminal offence data: In the interests of maintaining the values and tradition of the Club, we ask that, where relevant, applicants provide us with their criminal offence data together with their consent to process that data. This data is received by the Membership Team

and is communicated to the Membership Committee and CEO for the sole purpose of considering membership applicants. This data will never be shared with anyone else, inside or outside of the Club, used for any other purpose, or stored in any way which identifies it as criminal offence data.

Guests: Where members invite guests to join them within the Club, we will collect from the guest only that personal data which is directly relevant to their visit.

Third parties: In addition to membership information we also collect and process personal data relating to our suppliers, sub-contractors, and tradespeople. This data is held by us to manage our contractual relationships in regards to providing professional services to our members.

Who processes your information

The administrative, maintenance and support services provided to our members are delivered by either our own staff or by other sub-contractors or contracted tradespeople – these third parties are subject to the same regulatory regime and we regularly assess the compliance of our providers to ensure protection of your data.

How we process your personal data

We process your personal data to provide you with membership-related services, including bookings, events, access to our facilities and website, providing communications and updates, assisting with queries and applications from potential members, as well as for the provision of any other services related to the activities of a private members' club.

We process your personal data based on the following lawful bases as set out in Article 6 of the UK GDPR:

Consent: we collect and process your data with your consent.

Performance of a contract: the processing is necessary for the performance of a contract you have with us, or for the purposes of entering into a contract.

Compliance with legal obligation: the processing is necessary for us to comply with the law for tax, social security, and employment purposes, or for the safeguarding of health and safety of members, guests and employees.

Legitimate interests: the processing is necessary for our legitimate interests of providing membership-related services, or the legitimate interests of a data subject or third-party,

unless there is a good reason to protect an individual's personal data that overrides those legitimate interests.

We encourage our members to use the online Members' Area of the website, as a quick, convenient and easy way to report any problems, concerns or issues they may be experiencing with their membership.

Who we may share your data with

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put arrangements in place (i.e. a data processing contract or a data sharing agreement) to protect the data and to comply with our data protection, confidentiality and security standards.

Your personal data will only be disclosed to data processors to the extent necessary for the data processor to provide the services we require, such as mass distribution email, system administration or document management. Data processing contracts prohibit data processors from doing anything with your personal data that we have not instructed them to do.

We may disclose your personal information to third parties if we are under a duty to do so or share your personal data in order to comply with a legal obligation (e.g. a court order), or use it to enforce or apply any agreements, or protect the rights, property, or safety of the Club, or other individuals.

Occasionally, we may receive requests from third parties with authority to obtain the disclosure of personal data, for instance, to check that we are complying with applicable laws and regulations, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for the disclosure of personal data where we are permitted to do so in accordance with applicable laws or regulations. This includes exchanging information with other companies and organisations for safeguarding purposes and sharing your personal data under reciprocal agreements with organisations that provide education or professional development services.

International data processing

The Club processes your personal data within the UK. In some cases, your personal data may be transferred out of the UK (for example, when sharing your personal information with a club in our global reciprocal network), and should that become necessary, we will comply with relevant legislative requirements and take all reasonable steps to ensure the safety and security of your personal data.

These steps include only transferring personal data to countries with an adequate level of protection as deemed by the UK GDPR adequacy regulations, minimising the data we share, and/or seeking your consent prior to sharing any of your personal data internationally.

DATA RETENTION

The Club retains membership information in a live environment for the duration of your membership and in an inactive environment post-membership, for limited and specific purposes only, including those required by applicable laws or regulations. For example, we are required to keep details of financial transactions for seven years to meet accountancy and HMRC requirements. Retaining your personal data also enables us to provide you with an efficient re-joining process, should you wish to re-join the Club after resigning as a member.

For potential members who do not proceed to membership, visiting guests, associated membership guests and reciprocal members, as well as members who leave the membership, personal data is securely archived and appropriate safeguards are applied, with access restricted.

Updating or deleting your data

You may choose to correct, update, or delete your personal data by contacting us using any of the methods shown below in the '[How to contact us](#)' section. Should you wish to delete your personal data, this may result in you being unable to continue your membership or membership application, as we may be unable to provide you with our membership services in the absence of consent to process your data.

Your request to delete your data will be balanced against our Record Retention Schedule, based on our purpose and operational needs as well as applicable laws and regulations which require us to retain certain data. We will of course do our best to irretrievably and permanently delete as much of your personal data as possible and will otherwise store this with appropriate restrictions and safeguards.

If you have opted-in to receiving communications from us, your preferences will remain in effect until you tell us that you want to opt-out of receiving further communications. You can opt-out at any time using the Members Area of the website, or by contacting us using any of the methods shown below in the '[How to contact us?](#)' section.

DATA PROCESSED VIA OUR WEBSITE AND OUR COMMUNICATIONS

We use cookies and other tracking technologies to optimise our website and help us deliver relevant and interesting content in our communications. We also collect information for security and fraud detection purposes.

Cookies: by placing a 'cookie' on your computer, we collect standard log information, including your IP address, user behaviour details, search criteria entered, web pages visited on our website, type of internet browser and computer operating system you are using, domain name of the website from which you linked to our site, and technical information that helps us to identify the pages you found useful and thereby improve our website. This is standard practice for all websites.

You can modify your settings to erase cookies from your computer's hard drive, block all Cookies or receive a warning before a Cookie is stored. However, if you do this you may not be able to use the full functionality of our website.

Pixel tags: pixel tags are tiny graphic images with unique identifiers, similar to cookies, that are used to recognise when someone has visited our site or opened an email that we have sent to them. They are embedded invisibly in web pages. We do not tie information gathered by pixel tags to our users' personal information. Among other uses, pixel tags enable us to compile statistics about usage of our sites, so that we can manage our content more effectively.

Embedded script: we use a type of programming code to collect information about your interactions with our website, such as the links you click on. The code is temporarily downloaded onto your device from our server or a third-party service provider and is deactivated or deleted when you disconnect from our website.

Google Analytics: we use Google Analytics, a web analytics service provided by Google, Inc. ("Google") to analyse the information we gather via our website. The information is transmitted to and stored by Google on servers in the USA. Google uses this information to evaluate your use of our website and compile reports on website activity and internet usage. Google will not associate your IP address with any other data held by Google.

The information shared with Google is used solely for web server monitoring and to optimise the website visitor experience. However, Google may transfer this information to a third-party where required to do so by law, or where such third parties process the information on Google's behalf. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Profiling

We may use the information we collect, including information about your previous visits, to profile your website use. For example, we may use the information to display interesting content to you on our website, based on the pages you visited previously.

Third-Party Cookies

You may notice that on some of our web pages, cookies have been set that are not related to the Club. For example, when you visit a page with content embedded from third parties, these service providers may set their own cookies on your device. These cookies are likely to be analytical/performance cookies or targeting cookies.

We do not control the use of these third-party cookies and cannot access them. Please check the information provided on third-party websites for more information about their use of cookies and similar technologies.

Links to third-party websites

Our website connects you to the websites of our partner networks and affiliates. Please note that if you follow any of these links, you have left our website and you should read the privacy policies of our partner networks and affiliates before submitting any personal data to these websites. We do not accept any responsibility or liability to assist you to understand what they do with your information.

Communications

We may send you news and information about the Club by post or by email if you have consented to receiving such communications. However, you can opt-out of receiving email communications at any time by clicking the 'unsubscribe link' at the bottom of any email you may receive from us.

SECURITY OF YOUR PERSONAL DATA

We take the security of your personal data very seriously. Accordingly, we have implemented appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include clear internal policies and procedures for the ongoing processing of data and maintaining the physical security of our premises and IT security technologies to prevent the unauthorised access, damage, and loss of your data.

WHAT ARE MY DATA SUBJECT RIGHTS?

We support your data subject rights in relation to the processing of your personal data under the Data Protection Act 2018 and the UK GDPR, including your:

- right to be informed (which is provided chiefly via this Privacy Notice);
- right of access;
- right to rectification;
- right to erasure of your personal data, where our Record Retention Schedule does not restrict such erasure;
- right to restrict processing;
- right to data portability, or receiving your personal data which you have provided to us, in a portable format;
- right to object to processing; and
- rights related to automated decision-making, including profiling.

You can exercise any of these rights, including your right to request a copy of the information that the Army & Navy Club holds about you, by contacting us using any of the methods shown below in the '[How to contact us](#)' section. We will of course respond to your request within a reasonable timeframe.

WITHDRAWING MY CONSENT

Where we process information based on your consent, you may withdraw your consent at any time. You can do this by contacting us using any of the methods shown below in the '[How to contact us?](#)' section. This may result in you being unable to continue with your membership or membership application, as we may be unable to provide you with our membership services in the absence of consent to process your data.

MAKING A COMPLAINT TO US

We hope you'll never have the need to do so, but if you do want to complain about our use of your personal data, or our facilitation of your data subject rights, you can contact us using any of the methods shown in the '[How to contact us](#)' section. Your complaint will be investigated and an appropriate response provided within a reasonable timeframe.

MAKING A COMPLAINT TO THE INFORMATION COMMISSIONER

You can lodge a complaint with the Information Commissioner at any time if you are unhappy with the way in which we are processing your information, or if we have failed to

facilitate your data subject rights. The Information Commissioner can be contacted as follows:

By post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By phone: 0303 123 1113

Further information can be found here: [ICO Make a Complaint](#)

HOW TO CONTACT US

You may contact us using any of the following methods:

By post: Company Secretary
Army & Navy Club
36-39 Pall Mall
London
SW1Y 5JN

By email: club@therag.co.uk

CHANGES TO THIS PRIVACY NOTICE

We routinely review our Privacy Notices to ensure they accurately reflect what we do with your personal information. This Privacy Notice was last updated in June 2025.

CCTV Policy

This CCTV Policy ('The Policy') sets out how the data controller, the Army and Navy Club ('The Club') controls, manages, operates and secures the Closed-Circuit Television System (CCTV). It also communicates to data subjects their rights in relation to the personal data that is captured and recorded by the system.

The Club records and stores personal data on the CCTV system for the following purposes:

- For security and personal safety of members, staff, visitors and members of the public
- For security in the protection and monitoring of buildings, equipment and personal property of members, staff, visitors and members of the public
- For security in supporting the police and other related government agencies in preventing and detecting crime
- For security in supporting the police and other related government agencies in identifying individuals who are victim, perpetrators or affected by crime or other related incidents
- For disciplinary reasons in monitoring and upholding the rules of the Club

CCTV will not be used for monitoring employees work and personal life patterns.

Location and positioning of cameras:

- Internal and external locations have been selected to achieve the purposes set out above. Locations and positions are appropriate to the purposes of image capture and are not located in areas that require heightened levels of privacy
- Signage has been placed in visible locations in close proximity to cameras notifying all Club users that CCTV is in use
- Signage is clearly visible and identifies:
 - that the Club is the controller;
 - the purpose of the CCTV; and
 - the contact for any queries (being the Club's CEO)
- Locations and positions of cameras may change from time to time in response to tactics required to meet the purposes set out above, but will always remain visible and signed

- With the limited exception of cameras at the Club's public facing entrances, cameras are not public facing. Public facing entrance cameras are positioned to limit the capturing of the general public. Images of the general public outside of the Club will only be shared when requested to do so by an appropriate authority such as the police, for the purposes of maintaining public safety and crime prevention
- Cameras are not used in bedrooms or meeting rooms at any time

The location of the Club's CCTV cameras can be obtained from the CEO by request.

System operation and management

- Only authorised staff may observe the operation of the system, and may do so 24 hours a day, 365 days a year
- Viewing of captured images is restricted to authorised individuals and only authorised on the written instruction of the CEO
- Authorised personnel will receive training on the CCTV system
- Viewing of captured images will only be authorised in association with one of the purposes as above
- Where viewing of captured images is authorised, the purpose, time, date and images viewed will be documented and logged
- Authorised users may not disclose, access, transfer, copy, delete or modify any CCTV data without authorisation from the CEO. Unauthorised access may lead to disciplinary action and/or dismissal
- Unless otherwise required as evidence in pursuit of one of the stated purposes, images are recorded continuously 365 days of the year and stored for approximately 30-60 days before being overwritten. CCTV is stored locally and not in a cloud-based storage platform
- The Club takes proportionate organisational and technical measures to ensure the security of processing in accordance with Article 32 of the GDPR
- Regular maintenance of the cameras and the system will take place to ensure the continuity of recording and good health of the system
- The CCTV system is maintained by an external provider who only have access to the system when expressly permitted by The Army and Navy Club
- The CCTV system is internet connected. The Club has stringent firewall systems for all of its IT infrastructure including CCTV
- Where cameras have audio capability this will not be activated. Audio will not be recorded

Information Rights

- Individuals may request to view CCTV footage after providing date, time and location of the footage required wherever possible, subject to authorisation from the CEO
- Individuals may view the recording in the server room and will not be provided with footage to be removed from the server room
- Other individuals' images will be obscured prior to the data being provided

Image transfer and disclosure

- A log is maintained of all image transfers and disclosures. The log will document reasons for transfer or disclosure, the lawful basis for the transfer / disclosure, the individuals to whom the data has been transferred / disclosed, and the date, time and protections in place when the transfer / disclosure took place.

Any questions relating to this policy should be directed to: CEO@therag.co.uk.