

Victory Services Club — Privacy Notice

Who we are

The Victory Services Club is a private members' club in London, originally founded for former and serving members of the British Armed Forces, offering accommodation, dining, and social facilities.

This notice explains how we collect, use, disclose, retain and protect personal information about members, guests, visitors, event organisers/speakers, suppliers, job applicants, and website users. It also tells you about your data protection rights and how to contact us or escalate concerns.

Registered address:

63–79 Seymour Street
London
W2 2HF
United Kingdom

Contact (general): secretary@vsc.co.uk

Data Protection Lead: john.wilson@vsc.co.uk

1) What personal information we collect

Depending on your interactions with us, we may collect:

- **Identity and contact:** name, rank/affiliation (where provided), postal address, email, phone.
- **Membership:** membership number, join/renewal history, military service details, verification of eligibility, communications preferences.
- **Booking and stay:** room/event bookings, check-in/out dates, party details, special requests (e.g., accessibility), payment information (processed via secure payment providers), incident records.
- **Special category data (only when necessary):** Respite and Welfare Breaks, health or accessibility needs, dietary requirements (which may infer religion), safeguarding/incident reports.
- **CCTV and site security:** footage in and around our premises for safety, crime prevention and safeguarding (see section 7).

- **Recruitment:** CV/application details, references, right-to-work documentation.
- **Website and cookies:** analytics and preference cookies (see section 9).

We collect information directly from you, from your use of our services/website, and in limited cases from third parties (e.g., booking portals, event organisers, referees, security partners). Where we obtain data from other sources, we tell you the categories and the source where required by law.

2) Why we use your information and our lawful bases

We must identify a lawful basis for each purpose and explain it clearly. The table links our purposes to the lawful basis we rely on.

Purpose	Examples	Lawful basis
Membership administration	Assess/verify eligibility, set up and manage accounts, renewals, member services	Contract (to provide membership);
Accommodation & events	Process room/event bookings, manage stays and functions, handle payments, allocate rooms	Contract (to provide the service)
Safety & safeguarding	Incident reporting, responding to medical needs or welfare concerns	Legal obligation (H&S); Vital interests ; Special category under Article 9 (e.g., vital interests/substantial public interest where applicable)
Security & crime prevention	CCTV monitoring, access controls, fraud prevention	Recognised legitimate interests (crime prevention/safeguarding); or Legitimate interests (site security) see section 3
Direct communications & service messages	Booking confirmations, operational notices, membership updates	Contract or Legitimate interests (service communications)

Marketing (members & supporters)	Club news, events, fundraising appeals	Legitimate interests (B2B/most member contexts) or Consent for emails and newsletters
Recruitment	Process applications, interviews, offers	Legitimate interests (recruitment); Legal obligation (right to work)
Analytics & website performance	Understand usage to improve services	Consent for non-essential cookies/technologies
Legal/regulatory compliance	Record keeping, responding to lawful requests	Legal obligation; Public interest where applicable

3) Using Recognised Legitimate Interests (DUAA 2025)

The Data Use and Access Act 2025 (DUAA) introduced recognised legitimate interests (RLI) as a seventh lawful basis for certain pre-approved public interest purposes (e.g., crime prevention, safeguarding, emergencies, public/national security). Where our processing is necessary for one of these conditions, we may rely on RLI without a balancing test; we still remain transparent and proportionate. Commercial activities (e.g., marketing) are not RLI and continue to rely on other bases (typically legitimate interests or consent).

4) Special category information

We only collect special category data (e.g., health, religion inferred from dietary needs) when necessary, apply additional safeguards, and rely on an appropriate UK GDPR Article 9 condition (e.g., vital interests, substantial public interest such as safeguarding).

5) Where we get data from

- Directly from you (forms, bookings, membership sign-up, correspondence).
- From third parties acting on your instructions or on our behalf (e.g., booking engines, payment providers, event organisers), in which case we will identify the categories and sources where required.

6) Who we share data with

We share information only where necessary with:

- **Service providers (processors):** membership/booking systems, payment services, IT, email/SMS and postal services, security/CCTV maintenance.
- **Event partners** (where you attend a third party event at VSC) — we will tell you when this applies.
- **Professional advisers** and regulators/law enforcement where legally required or justified (e.g., safeguarding, crime prevention).
- **Other organisations** in limited scenarios covered by recognised legitimate interests (e.g., sharing to assist a public authority's official task), where conditions are met.

If you have signed a Gift Aid Declaration the relevant personal data, in relation to your declaration, will be shared with HMRC. HMRC dictates how Gift Aid Declarations are processed and become joint data controllers in relation to your Gift Aid Donation.

Where we use processors, we have contracts in place to ensure your data is only used on our instructions and protected appropriately.

7) CCTV and premises security

We operate CCTV inside and around VSC for safety, security and crime prevention. Signs are displayed where CCTV is in use. The ICO's video surveillance guidance applies; no specific statutory minimum or maximum retention applies to CCTV — retention must be necessary and proportionate to the purpose. We typically keep footage for a short period (e.g., around 30 days) unless required longer for an investigation or legal claim, but we will set and review retention based on purpose, risk and storage constraints.

8) Cookies, similar technologies and marketing

Our website uses cookies and similar storage/access technologies. Under Privacy and Electronic Communications Regulations (PECR), you must be told about cookies and (for non-essential cookies) we must obtain your consent. There are exemptions for strictly necessary cookies; following the DUAA, certain additional purposes may be exempted (e.g., some security or service enhancing uses), but users should retain the ability to opt out of these where applicable. We will keep our cookie banner and notice aligned with ICO.

For direct marketing by email/SMS, PECR rules apply in addition to data protection law. We rely on consent or soft opt-in where permitted (e.g., to market similar VSC services to existing members/customers. You can opt out at any time.

9) International transfers

If we transfer personal information outside the UK, we will follow the ICO's updated guidance, using the three step test to determine whether a transfer is "restricted" and then applying an appropriate mechanism (e.g., UK adequacy regulations, IDTA or relevant safeguards), and completing a transfer risk assessment where required. We will document transfers and safeguards clearly in our records and, where relevant, in this notice.

10) How long we keep your information

We apply the storage limitation principle: keep data only for as long as needed for stated purposes, legal obligations or limitation periods. Summary examples appear below (subject to operational/legal requirements); detailed schedules are available on request.

Category	Typical retention (illustrative)	Rationale
Membership records	Life of membership + 6 years	Contract records / limitation period
Booking records (rooms/events)	6 years from stay/event	Accounting/contractual claims
CCTV footage	30 days (longer if required for an incident)	Necessary & proportionate to purpose; no fixed legal period
Incident/safeguarding reports	As required by law and risk (case-by-case)	Safety/legal obligations
Marketing preferences/suppression lists	Until opt-out + ongoing suppression	Demonstrate compliance with PECR

Job applicant records	6-12 months (unless hired)	Recruitment administration / defence of claims
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11) Storage and Security

Your information is stored on our computers and backed up on servers in UK and access to personal data is restricted according to the user's needs, some information is restricted to key personnel only. We place a great importance on the security of the data we hold on our members and we have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control.

We use appropriate technical and organisational measures to protect data (e.g., access controls, encryption at rest/in transit where applicable, staff training, supplier due diligence, secure disposal). We operate an incident response process and will notify the ICO/affected individuals where legally required.

12) Your rights

Under UK data protection law you have rights, subject to conditions and exemptions: to be informed, access, rectification, erasure, restriction, data portability, objection, and rights relating to automated decision making and profiling. You may submit requests free of charge and we aim to respond within one month (we may extend by up to two further months for complex requests and will explain why).

We do not routinely make decisions solely by automated means that produce legal or similarly significant effects. If we ever do, we will tell you and explain your rights (including to request human review).

How to exercise your rights: Contact our DPO (details above). For security, we may ask for identification and clarification to locate data efficiently.

You have the right to withdraw consent to receiving marketing information at any time. If you would like to withdraw consent, you can do so by e-mailing mem@vsc.co.uk or by logging in our Members Area and updating your preferences in our Consent Dashboard.

13) Complaints - our process and your right to contact the ICO

We aim to resolve concerns directly. Please contact our DPO first. We will acknowledge your complaint, investigate, keep you informed and provide a written outcome. If you remain dissatisfied, you can raise your concern with the ICO.

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 0303 123 1113 (Mon–Fri 9am–5pm)

ico.org.uk

14) Children's information

VSC is primarily an adult member organisation, but children may attend family events or visit our premises. We apply heightened protection to children's data. If any online services we offer are likely to be accessed by children, we will align with the ICO's Children's Code (e.g., high privacy by default, minimisation, no unnecessary profiling, clear child friendly notices) and conduct a Data Protection Impact assessment (DPIA) as needed.

15) Changes to this notice

We will review and update this notice to reflect changes in law or how we process personal information.

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