



Privacy Policy

At Topper, we are committed to protecting and respecting your privacy.

To register you as a member of our email marketing/CRM database to avail of our services communicate with you regarding any news about us and any offers / competitions we believe will be of interest to you, we will need to process personal data.

We also want you to be clear as to what rights you can invoke to help you to protect your privacy.

In this regard, it is important that you read this privacy statement and understand our use of your personal data.

1.1 Company Information

References to 'Topper' refers to our online business

1.2 Legislation

Rest assured that all personal data we gather will be processed in accordance with all applicable data protection laws and principles, the EU General Data Protection Regulation 2018 and the Data Protection Acts 1988 and 2003.

1.3 Queries and Complaints

If you are unhappy with the way we have handled your personal information and wish to complain or if you simply want further information about the way your personal data will be used, please contact us by email info@topper.ie.

You have the right to lodge a complaint with the Office of the Data Protection Commissioner. To contact the Office of the Data Protection Commissioner, please use the following details:

Data Protection Commissioner.

Canal House
Station Road
Portarlinton
County Laois
Telephone: +353 (0)761 104 8000
Telephone: +353 (0)57 868 4800
Email: info@dataprotection.ie
LoCall Number: 1890 252 231
Fax: +353 57 868 4757

Please note that we will take all appropriate steps to keep your personal data safe. In the unlikely event that we have a security breach, we will notify you without undue delay about the circumstances of the incident in accordance with our legal obligations.

1.4 Personal identification information

We may collect personal identification information from users in a variety of ways, including, but not limited to, when users visit our site, register with us or complete a form subscribe to the newsletter and other activities, services, features or resources we make available on our site. Users may be asked for, as appropriate, name, email address, mailing address, phone number, credit card information. Users may, however, visit our site anonymously.

We will collect personal identification information from users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain site related activities.

1.5 Non-personal identification information

We may collect non-personal identification information about users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about users means of connection to our site, such as the operating system and the Internet service providers utilized and other similar information.

1.6 Web browser cookies

Our Site may use "cookies" to enhance user experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the site may not function properly.

2. How do we collect information?

We collect personal data to provide our services to you.

The personal data we collect will be gathered and stored as set out in this privacy statement. This will be done directly by our sales and administration staff. The categories of personal data that we gather are listed in Section 5 'Data Collected' below.

We gather personal data, to market and sell our services to you, our customer.

3. What do we use information for?

We mainly use your personal information so that we can provide you with our online services.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us.

To enable us to support customers with sales and other enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us
2. To provide support for our online service offering

To support us in understanding customers' needs

1. To analyze, evaluate and improve our services so that your visit and use of our website, applications, customer service are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally).

2. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraph above.

Processing necessary for us to promote our business and measure the reach and effectiveness of our campaigns

1. We may send marketing information from time to time after you have used our services or made an enquiry, or requested other information of interest. You have the right to object to us sending you this information at any time.
2. All contact by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing.
3. We may contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object.
4. To identify and record when you have received, opened or engaged with our website or electronic communications;
5. To administer competitions and promotions that you enter with us from time to time and to distribute prizes.

Processing necessary for us to operate the administrative aspects of our business efficiently and effectively

1. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer.
2. For network and information security purposes i.e. for us to take steps to protect your information against loss, damage, theft or unauthorized access.
3. To comply with a request from you regarding the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists to be able to comply with your request).
4. To inform you of updates to our terms and conditions and policies.

Not Providing Information

If you do not provide us with all the information we require, the resulting action may be that we are not able to fully offer you our services.

Furthermore, some services provided by us require certain categories of information, without which, we may not be able to provide you with the service.

4. Who do we share information with?

Third Party Providers

Users may find advertising or other content on our site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our site, is subject to that website's own terms and policies.

We integrate our data with the following systems / applications to run and analyze our business as effectively as possible:

Third Party Provider	Data Shared
Mailchimp	Email address
Stripe	Account and profile information to enable financial transactions

Our representatives:

Our employees and contractors including companies that provide services in relation to data storage, IT and IT security and customer loyalty programmes.

5. How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our site.

6. What are your rights?

As a data subject, you will have the following rights, as outlined in this section. However, restrictions may apply in certain situations.

Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow us to deal with your request efficiently. To answer your request, we may ask you to provide identification for verification purposes.

How long will a request take to complete?

Upon receipt of a request, we will have 30 days to provide a response, with an extension of two further months if required. If we require more time to deal with your request, we will notify you of the delay, and the factors resulting in the delay, within 30 days of the receipt of the request. If we refuse your request, we will notify you within 30 days of the receipt of the request accompanied by the reason for refusal.

You are entitled to contact the Office of the Data Protection Commissioner if we refuse your request.

Right of Access

You have a right to know what personal data we hold on you, why we hold the data, and how we are processing the data. When submitting your request, please provide us with information to help us verify your identity Name, Address, Phone Number and Email address and as much detail as possible to help us identify the information you wish to access (i.e. date range, subject of the request).

Right to Rectification

You have a right to request that the personal data held in relation to you is up to date and accurate. Where information is inaccurate or incomplete, we encourage you to contact us to have this information rectified. Upon receipt of request, we will ensure that the personal data is rectified and as up to date as is reasonably possible.

Right to be Forgotten

You have the right to seek the erasure of personal data relating to you in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained.
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists.
- The personal data is being unlawfully processed.
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing.
- Your personal data requires deletion in line with legal requirements.

However, we will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

Please be aware that in certain circumstances we may need to retain some information to ensure your preferences are respected in the completion of our duties. For example, we cannot erase all information about you where you have also asked us not to send you marketing material. Otherwise, your preference not to receive marketing material would be erased.

Right to Restriction

You have the right to restrict the extent of personal data processed by us in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until we update your information).
- The processing of the personal data is unlawful but you wish to restrict the processing of data rather than erase it.
- Where the personal data is no longer required by us but you require the retention of the data for the establishment, exercise, or defense of a legal claim.
- You have a pending objection to the processing of your personal data.

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of other people; or for reasons important to public interest. We will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after we have informed you that we are doing so.

Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis of a contract.
- Processing is completed based on the provision of your consent.
- Processing is carried out by fully automated means.

You may also request that we send this personal data to another data controller where technically feasible.

Right to Object

You have the right to object to the processing of your personal data. However, the processing must have been undertaken on the basis of legitimate interest by us.

If you wish to object to the processing of data, please contact us with your request. We will then stop the processing of personal data unless it is required for legal proceedings.

Right not to be subject to Automated Decision Making, including Profiling

You have a right not to be subject to a decision based solely on automated processing or profiling, where such decisions would have a legal effect or significant impact on you.

7. Changes to this privacy policy

Topper has the discretion to update this privacy policy at any time. When we do, we revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

8. Your acceptance of these terms

By using this site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our site. Your continued use of the site following the posting of changes to this policy will be deemed your acceptance of those changes.

9. Contact us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us by email: info@topper.ie

10. Latest Policy Revision Date

25.05.2018