

Privacy Statement

Who are We?

We respect Your privacy and will never process personal data for purposes other than those specified in this statement. Personal data will only be processed at any time if You visit the website, creates an account or otherwise uses one of Our services, if the processing is necessary for the legitimate our interests or in the event You have given Your express consent. Personal data is processed by:

Entrepreneur: Digilex Limited

Based in: Flat 1 103 Leggatts Wood Avenue, WD24 6RL, Watford, United Kingdom

Chamber of Commerce Registration: 13117449

Email address: info@topblass.com

Telephone number:

Website: topblass.com

We are bound by applicable privacy laws and regulations, including the General Data Protection Regulation (GDPR). We are responsible for maintaining Your records and data management for analytics and marketing purposes. We have the duty to carry out our responsibilities under the GDPR. We are responsible for all data processing performed by or on our behalf, including topblass.com.

We collect and process personal data for the user administration, the general contract execution, the payment collection, the website, direct marketing and to comply with legal obligations.

The personal data collected by Us mainly serves to fulfil the agreement regarding the provision of a service by Us. If this data is not provided, We will not be able to fulfil Our contractual obligations.

Data processing, purposes and terms

Personal data is never kept longer than is strictly necessary and can be viewed, changed and deleted by You at any time. Viewing, changing and removing (including the right to be permanent removal), and withdrawing Your consent can be done by means of a clear statement addressed to info@topblass.com. If You believe that Your personal data has been incorrectly used, gained, stored and or obtained, and You are not satisfied with the outcome of the request to Us, You may always file a complaint with the supervisory authority in Your country.

We store the following types of Your personal data:

- I. to subscribe to Our services, Your
- name;
 - address;
 - postal code;
 - city;
 - email address;
 - login details;
 - payment details;
 - account name or profile name and information relating to the technical and hardware environment (eg. device information, operating system).

We will remove Your personal data in relation to the subscription to Our services 3 years after You unsubscribed from the services, unless You have explicitly given permission to store the personal data for a longer period or if the data must be kept for a longer period due to legal regulation or provision.

- II. to create an account, Your:
- name;
 - address;
 - postal code;
 - city;
 - email address;
 - login details;
 - IP address;
 - information about access and usage of the services, settings and preferences.

We will remove Your personal data in relation to his created account 3 years after You unsubscribed from the services, unless You have explicitly given permission to store the personal data for a longer period or if the data must be kept for a longer period due to legal regulation or provision.

- III. to send You Our newsletter, Your:
- name;
 - e-mail address.

We will remove Your personal data in relation to sending Our newsletter, until You unsubscribe from the newsletter. Under each commercial mailing You find an unsubscribe link.

- IV. to handle complaints and questions, Your:
- name;
 - telephone number;
 - email address;
 - account number;
 - any information You provide as content of his message.

We will remove Your personal data in relation to handling complaints and questions 6 months after satisfactory resolution of the complaint.

Processing data with external parties

In order to fulfil the agreement, We may engage a number of third parties who may also have access to Your data. In any case these parties will only keep Your data for the time necessary to perform their work. Under no circumstances will these personal data be used for purposes other than the activities performed on Our behalf, unless explicit permission has been requested from the data subjects. All external transfers of personal data are subject to data processing agreements if required by law.

It is possible that We process personal data to parties outside the European Economic Area (EEA) for providing the services. We ensure that the external parties engaged by Us outside the EEA have clear privacy statements, security policies and measures. It is very important to Us that Your personal data processing by those external parties outside of the EEA is handled correctly.

We use a webhosting party, a web designer, other IT suppliers and service providers for the hosting of the website. Those external parties have access to the database and therefor have access to Your personal data.

We use, in addition, an external email service provider and other marketing companies to send commercial emails and other direct marketing purposes. These external parties have access to specific (email) databases.

Furthermore We use support service providers such as legal service providers and customer support providers. Those parties only have access to specific personal data from people who have a complaint or question.

We use Payment Service Providers for the processing of payments. Personal data, insofar as necessary for processing the payments, are collected by the Payment Service Providers themselves. The privacy policy of that specific payment provider applies to the collection of personal data necessary to provide their services.

In case You wish to receive more information about which data is used by the external parties, You can send an email to info@topblass.com.

Data breaches

Your personal data will be handled by Us with utmost care. We do everything reasonably possible to process the personal data in a secure manner. If and to the extent required, potential data breaches will be reported to both the Data Protection Authority (DPA) in the country where We have Our registered office, and those whose personal data may have been compromised. In case of a data breach, We will always take appropriate measures to ensure the integrity of the website.

Cookies

We may use cookies and similar techniques (hereinafter: Cookies) on the website. With this (personal) data is collected, stored, shared and/or otherwise processed via Your browser to remember Your preferences and to recognize You on a future visit. Furthermore, the cookies are used to enable Us to collect information about the use of Our services. This information is used to optimize the use of the services for and to tailor them to Your wishes.

Although most browsers are set by default to automatically accept cookies, it is possible for You to set the browser so that cookies are no longer received. However, the consequence of this may be that it becomes (partially) impossible for You to use certain of Our services.

Also placed via Our platforms are cookies from third parties. The third-party cookie statement applies in this case to the use of these cookies.

The functional cookies We use on the website are called session cookies and session storage. Session cookies are intended to make the website function properly. Before using session cookies, it is unnecessary to ask for permission to You, because each time You visit the website, these session cookies contain a different temporary number. After closing the browser by You, the session cookies are removed. We ensure that the website works properly with the help of functional Cookies.

We also may use cookies for which You must first give permission. You can set Your browser in such a way that cookies are handled specifically. You can, as an example, completely not accept cookies or only accept cookies from the website You have visited and not from other domains. This may have consequences for Your options or experience of the website. Please contact Us if there are any questions about this cookie statement or the cookies used by Us.

It is possible that there are marketing cookies from Us and external parties placed on Our website. It is even possible that Our marketing cookies are placed on the websites of external parties. Combining the information from the marketing cookies allows Us to track You, to see who often You have viewed which advertisement and prevent You from seeing advertisements which are not relevant, based on Your online, surf and buying behaviour or seeing the same advertisement over and over again

Analytical cookies will be used by Us. With the help of external parties the analytical cookies will be used to research and optimize the use of Our website. We have been concluded a data processing agreement with Google Inc. to use Google Analytics. Besides, We use settings to make sure that IP addresses are only processed anonymized (of which the last byte has masked). Google has not given permission by Us to use any data for own purposes. Furthermore, Google analytical cookies are not used in combination with other services of Google. Finally, You can disable these cookies if You want to by using the Google Analytics Opt-Out Browser Add-on.

Blacklist

Personal data of people who have committed a serious infringement of the trust invested in them by Us can be blacklisted. Only a very limited group of employees will be given access to the blacklist. Personal data on the blacklist will be retained indefinitely. The blacklist will be used for Our current and future deals. People, who will be included on the blacklist are, for example, people who fail to meet payments, after multiple requests.