

PRIVACY AND DATA PROCESSING NOTICE

Effective date: 9 September 2026.

1. Controller and scope of this Notice

The controller is L.V. Technik Kereskedelmi és Szolgáltató Kft. (registered office: Ceglédi út 70, 6050 Lajosmizse, Hungary; company registration number: 03-09-103303; tax number: 11039165-2-03; email: info@lvt.hu; telephone: +36 76 493 507; website: <https://www.lvt.hu>; hereinafter the Controller or L.V. Technik).

This Notice applies to visitors, registered users, customers purchasing without registration, contact persons, newsletter subscribers and persons requesting quotations through the www.lvt.hu webshop. A purchase does not always require registration: the webshop also allows a customer to place an order as a guest without creating an account.

The Controller has not appointed a data protection officer. Privacy questions and data subject requests may be submitted to info@lvt.hu.

2. Principles and legal bases of processing

The Controller processes personal data lawfully, fairly and transparently, for specified purposes, only to the extent and for the period necessary, and protects the data with appropriate technical and organisational measures.

Depending on the processing activity, the legal basis is:

- performance of a contract or steps taken at the data subject's request before entering into a contract under Article 6(1)(b) GDPR;
- compliance with a legal obligation under Article 6(1)(c) GDPR, in particular accounting, tax and invoice-reporting obligations;
- legitimate interests under Article 6(1)(f) GDPR, in particular IT security, enforcement of claims, prevention of abuse and payment fraud, and provision of technical services necessary for operation;
- freely given consent under Article 6(1)(a) GDPR, for example for a newsletter, an optional functionality cookie or statistical measurement using Google Analytics.

Withdrawal of consent does not affect the lawfulness of processing before withdrawal. Processing necessary for a contract or legal obligation is not based on consent, so withdrawing consent cannot cause data subject to a mandatory retention period to be erased immediately.

3. Data, purposes and retention

3.1. Account and registration

During registration, the Controller processes the person's or company's name, contact person's name, billing and delivery address, country, VAT number, email address, telephone number, secure password hash, language and other account settings. The purposes are account creation, sign-in, access to the cart and past orders, customer relations and contract performance. The legal basis is Article 6(1)(b) GDPR.

Account data is retained while the account exists. Following a deletion request, it is retained only to the extent and for the time required by a legal obligation, enforcement of claims or security. Deleting an account does not erase invoice data and completed-order data that must be retained by law.

3.2. Guest and registered purchases

For both guest and registered purchases, we process the customer's and contact person's name, company name, email address, telephone number, billing and delivery address, country, VAT number, cart and order items, amounts, currency, payment and delivery method, order status, evidence of acceptance of the Terms and other required declarations, and order-related communications. The purposes are receiving, confirming, performing, paying, delivering and supporting the order and handling claims. The main legal basis is Article 6(1)(b) GDPR.

Contract and claim-related data is generally retained for five years after performance, in line with the applicable civil-law limitation period. Invoices, accounting documents and their supporting data must be retained for at least eight years under accounting rules. If a dispute or authority or court proceeding is pending, related data may be retained until the proceeding is finally closed.

3.3. Invoicing, taxation and VIES

Data processed for invoicing and accounting includes the name or company name, address, country, VAT number, order lines, price, tax content, currency and payment data. Invoicing is performed in L.V. Technik's own Ivtapp business system; the webshop has no Billingo, InnVoice or other external invoicing-software integration.

Invoice data required by law is transmitted to the Hungarian National Tax and Customs Administration's Online Invoice system. The legal basis is Article 6(1)(c) GDPR and applicable tax and accounting law. Retention is at least eight years.

When an EU VAT number is checked, its country code and the VAT number are sent to the European Union VIES service and the competent Member State tax authority. We process the result, time and technical reference of the check to demonstrate correct VAT treatment and comply with tax obligations. The legal basis is Article 6(1)(c) and (f) GDPR.

3.4. Payment and Barion

If Barion payment is selected, data required to start and administer the order and payment, in particular the order identifier, amount, currency, item data and payment status, is sent to Barion Payment Inc. L.V. Technik does not receive or store bank card details; Barion processes them on its own interface. The legal basis for payment-related processing is contract performance and compliance with legal obligations.

Barion is an independent controller for payment services, risk management and fraud prevention. Information on its processing and retention is available at <https://www.barion.com/en/privacy-notice/>.

3.5. Delivery

For courier delivery, the courier actually assigned to the order receives the name, delivery address, email address, telephone number, parcel and order identifier and, for cash on delivery, the amount to be collected. The application's current courier master data contains GLS and RGA services; only the provider selected for the order receives the data. The legal basis is Article 6(1)(b) GDPR.

The courier retains data in accordance with its own privacy notice and its delivery, accounting and legal obligations. L.V. Technik retains delivery data for the retention period applicable to the related order and accounting data.

3.6. Contact, quotation requests and uploaded files

When a person contacts us or requests a parts quotation, we may process the name, email address, telephone number, request text, vehicle or product identifiers and images voluntarily uploaded. The purpose is responding and taking pre-contractual steps. The legal basis is Article 6(1)(b) GDPR or, for other enquiries, the legitimate interests of the Controller and the data subject in communication. Data is retained for no longer than five years after the matter is closed; a simple quotation request that does not lead to a contract is retained only until its purpose ceases.

3.7. Newsletter

We send newsletters to the provided name and email address only on the basis of separate, freely given consent. Consent can be withdrawn at any time in account settings, through the unsubscribe link in a newsletter or at info@lvt.hu. Newsletter data is kept until unsubscribing, while evidence of consent is retained for the time necessary for possible claims.

3.8. Technical and security logs

For operation, troubleshooting, protection against abuse and IT security, the web server and application may record the IP address, timestamp, requested URL, browser and device characteristics, session and error information. The legal basis is the Controller's legitimate interest in secure operation and protection of its rights. Logs are kept for the shortest period necessary for the purpose and, in case of a security event or legal claim, until its investigation and closure.

3.9. Web analytics – Google Analytics 4

Following separate consent to statistical processing, the Controller uses Google Analytics 4 (GA4) to measure webshop traffic, usability and performance, identify navigation problems and analyse the product, cart, checkout and ordering processes in aggregate.

For a visitor who has consented, GA4 may process in particular:

- a randomly generated client and session identifier;
- the title and URL of the page visited, referring page, campaign parameters, timestamp and session characteristics;
- approximate location, language, browser, operating system, device and screen characteristics;
- page-view and basic interaction events;
- for an ecommerce event, the product identifier, product name and category, quantity, currency, value, stage of the purchase process and an internal transaction identifier.

The IP address may be technically processed when establishing the network connection to Google's servers and deriving approximate location. Google states that it does not log or store individual IP addresses of visitors located in the EEA and discards them after deriving geolocation data.

We do not send names, email addresses, telephone numbers, postal addresses, VAT numbers, bank card details, free-text notes or other direct customer identifiers to GA4. We do not use GA4 User-ID, Google signals, a Google Ads link, remarketing or personalised advertising.

The legal basis is freely given consent under Article 6(1)(a) GDPR. The GA4 tag operates in Basic Consent Mode: before the first consent decision and after refusal it does not load, does not set GA cookies and does not send a consent or measurement ping to Google. Refusing analytics consent does not restrict use of the webshop or placing an order. Consent may be withdrawn at any time through the Cookie settings link in the footer.

User-level and event-level retention in the GA4 property is limited to 14 months. This setting does not necessarily apply to standard aggregated Google Analytics reports. GA cookies present in the browser are deleted when consent is withdrawn; data lawfully collected before withdrawal remains subject to the configured retention and deletion rules. Google's information on Analytics data safeguards is available at <https://support.google.com/analytics/answer/6004245> and Google's general Privacy Policy is available at <https://policies.google.com/privacy>.

4. Cookies and other browser-side storage

A cookie is data stored in the browser. A cookie or online identifier may constitute personal data when combined with other information; therefore, we do not claim that cookies can never process personal data.

Merely opening or continuing to use the site does not constitute consent to optional cookies. On the first visit, the TermsFeed Free Cookie Consent 4.2.0 interface is displayed. The visitor may accept or reject the optional categories or make a category-level choice in detailed settings. The functionality and analytics categories are disabled by default. The Cookie settings footer link allows the choice to be changed or

withdrawn at any time. Functionality and GA cookies that are no longer permitted are deleted after withdrawal; withdrawal does not affect the lawfulness of earlier processing.

4.1. Strictly necessary cookies and storage

- `_session_id`: L.V. Technik session identifier for sign-in, cart, currency and checkout; retained until the browser session ends.
- `my_locale`: remembers Hungarian or English; under the current technical setting it is persistent and may remain for up to approximately twenty years.
- `cookie_consent_level` and `cookie_consent_user_accepted`: record the decision made through the TermsFeed interface and the fact that a decision was made; retained for 365 days.
- `lvt.historyBridge.store` and `lvt.historyBridge.currentIndex`: `sessionStorage` data used for the webshop's Back/Forward navigation; retained until the browser tab is closed.

These are necessary for the webshop and consent management to operate. Rejecting optional categories does not disable them.

4.2. Functionality cookie

- `devicePixelRatio`: remembers until the browser session ends whether a normal or high-resolution product image is required. It is created only after the functionality category is accepted and is deleted after rejection or withdrawal.

4.3. TermsFeed

The free version 4.2.0 script loaded from the TermsFeed.com website provides the consent interface. The decision is stored in the first-party cookies listed above. When the script is requested, the TermsFeed CDN receives ordinary technical request data such as IP address, timestamp, browser and device characteristics. The purpose is to provide consent management; the legal basis is the Controller's legitimate interest in lawful and demonstrable cookie management. Consent cookies are retained for 365 days. Details and retention for TermsFeed's own technical processing are available at <https://www.termsfeed.com/legal/privacy-policy/>.

4.4. Google Analytics 4 cookies

After the analytics category is accepted, GA4 may use the following first-party cookies:

- `_ga`: a random client identifier used to distinguish visitors;
- `_ga_<identifier>`: an identifier used to persist session state; the exact suffix is derived from the technical identifier of the GA4 data stream.

The intended maximum lifetime of both cookies is 13 months from the most recent update. They are not created before the analytics category is accepted and are deleted after refusal or withdrawal.

4.5. Base Barion Pixel

The Base Barion Pixel operates on all public pages to prevent Barion payment fraud, regardless of acceptance of optional cookies. The Base Pixel may process basic page-view and technical data, a browser fingerprint, visit timestamps and whether third-party cookies are enabled. We do not send Full Pixel product, cart, checkout or purchase events and do not permit Barion to use the data for marketing.

- `ba_vid` and `ba_vid.<merchant>`: fraud-prevention browser identifier; retained for 1.5 years from the last update.
- `ba_sid` and `ba_sid.<merchant>`: fraud-prevention session identifier; retained for 30 minutes.

The legal basis for fraud prevention is the legitimate interests of L.V. Technik, Barion and customers in preventing payment fraud. Barion is an independent controller for Base Pixel data. A data subject may object to processing based on legitimate interest; Barion's detailed notice and contact details are at <https://www.barion.com/en/privacy-notice/>.

4.6. External technical resources

The public interface requests the jQuery technical library from the Google Hosted Libraries

ajax.googleapis.com CDN with a local fallback. The external request may transmit the IP address, timestamp and browser headers to Google, but L.V. Technik does not use this request for analytics or advertising. Google Maps addresses are ordinary links; Google Maps opens only after a click.

The footer and About page may load a Dun & Bradstreet/Bisnode certificate image from an external server, which may also receive technical request data. The legal basis is the legitimate interest in providing an operating interface and displaying the company certificate. Retention of provider logs is governed by each provider's privacy notice.

5. Processors and recipients

- Amazon Web Services (AWS): hosting, server, database and related infrastructure and Amazon SES email delivery. AWS processes webshop, order and email data as a processor under the Controller's instructions.
- Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) and the subprocessors engaged by Google: provision of the GA4 analytics service in relation to visitors who consent to statistical processing. The Controller does not link GA4 to Google Ads and disables optional data sharing for the development of Google's products.
- The courier assigned to the order: recipient of data necessary for delivery. Current system options are GLS and RGA.
- Barion Payment Inc.: independent controller for payment, risk management and fraud prevention.
- Hungarian National Tax and Customs Administration: recipient of invoice data required by law.
- EU VIES and the competent Member State tax authority: recipients of an EU VAT number check.
- TermsFeed, Google Hosted Libraries and Dun & Bradstreet/Bisnode: recipients of technical metadata from direct browser requests as described in Section 4.

The Controller may also disclose data in response to a lawful request from an authority or court. We do not sell personal data or disclose it to a third party for that party's own direct-marketing purposes.

6. International transfers

AWS, TermsFeed and Google are global providers, and their services may involve processing or access outside the EEA. Where applicable, a transfer relies on an adequacy decision – including the EU–US Data Privacy Framework where applicable –, the European Commission's Standard Contractual Clauses, a data processing agreement and any necessary supplementary safeguards. The AWS GDPR Data Processing Addendum forms part of the AWS Service Terms; the Google Ads Data Processing Terms apply to Google Analytics processing.

Further information on safeguards applicable to a specific transfer may be requested at info@lvt.hu. Barion's, the Hungarian tax authority's and EU VIES's own notices govern their subsequent processing and transfers.

7. Automated decisions and profiling

L.V. Technik does not carry out marketing profiling and does not make a solely automated marketing decision producing legal or similarly significant effects. GA4 is used only for aggregated traffic and process analysis; Google signals, User-ID, remarketing and personalised advertising are not enabled. The VIES check and application of VAT rules are technically supported; human review may be requested for a disputed or failed result.

As an independent controller, Barion may use automated risk analysis to reject suspected fraudulent payments or make them subject to additional conditions. Barion's privacy notice explains the rights to human intervention, to express a view and to challenge such a decision.

8. Data security

The Controller uses access controls, authentication, encrypted HTTPS connections, secure password hashing, logging, backups and need-based permissions. No internet transmission can be guaranteed to be entirely

risk-free, but the Controller maintains technical and organisational measures proportionate to the risk.

9. Data subject rights

The data subject may request access to, rectification or erasure of personal data, restriction of processing and, where its conditions are met, data portability. The data subject may object to processing based on legitimate interests and may withdraw consent at any time. Where the GDPR conditions apply, the data subject may request not to be subject to a solely automated decision.

A request may be sent to info@lvt.hu or the Controller's postal address. The Controller normally replies within one month; this may be extended by two further months under the GDPR. Proportionate information necessary to verify identity may be requested.

Rights to erasure and objection are not absolute: data may continue to be processed where required by law, for legal claims or for compelling legitimate grounds. Rights concerning Barion's own processing may also be exercised directly with Barion.

10. Complaints and remedies

The data subject may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH; address: Falk Miksa utca 9-11, 1055 Budapest, Hungary; postal address: Pf. 9, 1363 Budapest, Hungary; email: ugyfelszolgalat@naih.hu; telephone: +36 1 391 1400; website: <https://www.naih.hu>) and may bring proceedings before a court. Proceedings may also be brought before the court competent for the data subject's habitual residence or place of stay.

11. Amendments to this Notice

The Controller updates this Notice when actual processing or the legal environment changes and gives appropriate notice of material changes. New consent is requested only if consent is the legal basis for the new processing; continued use of the website does not in itself constitute new consent.

12. Principal legal sources

This Notice is based in particular on Regulation (EU) 2016/679 (GDPR), Hungarian Act CXII of 2011, Act C of 2000, Act CL of 2017, Act CXXVII of 2007, Act V of 2013 and the rules on electronic communications, commerce and advertising in force from time to time.