

# PRIVACY POLICY

## 1. The purpose of the policy

The purpose of this policy is to tackle the principles of the data processing used by the L.V. Technik Lft and the privacy policy of the company. The L.V. Technik Ltd regards these principles and rules binding on itself.

The L.V. Technik Ltd. respects every person's rights and freedom, especially the right to privacy and informational self-determination.

## 2. Definitions

Personal data: any data relating to the data subject. Data subject means a natural person identified or identifiable based on any information. Identifiable natural person: a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. As long as the connection between the data and the natural person can be reestablished, the data remains personal data.

Dataset: all data processed in a single registry.

Processing: any operation or set of operations that is performed on data, regardless of the procedure applied; in particular collecting, recording, registering, organising, storing, modifying, using, retrieving, transferring, disclosing, synchronising or connecting, blocking, erasing and destroying the data, as well as preventing their further use; taking photos and making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples and iris scans).

Processor: the L.V. Technik Commercial and Provider Ltd. (Headquarter: 6050 Lajosmizse, Ceglédi út 70. Hungary)

Technical processing: the totality of data processing operations performed by the processor acting on behalf of, or instructed by, the controller.

Data destruction: the complete physical destruction of the data medium that contains the data.

Data transfer: providing access to the data for a designated third party.

Disclosure: making the data accessible to anyone.

Controller: the natural or legal person, or organisation having no legal personality, which, within the framework laid down in an Act or in a binding legal act of the European Union, alone or jointly with others, determines the purposes of data processing, makes decisions concerning data processing (including the means used) and implements such decisions or has them implemented by a processor.

Data erasure: making the data unrecognisable in such a way that its restoration is no longer possible.

Automated data file: data processed in an automatic way.

Automatic processing: any form of automated or part automated processing of personal data: storing, logical or arithmetical operations, modifying, erasing, retrieving and forwarding.

User: any natural person who creates an account in the shop on the www.lvt.hu website.

## 3. Scope of the Policy

This Policy is enure after publishing on the lvt.hu website and stays in effect until withdrawal. Updated: 2020.01.01.

The Policy is applicable both inland and foreign lands in regard to the shop is accessible worldwide. The language of the Policy is English.

## **4. Collected and processed personal data**

### **4.1. Given by the User during the registration:**

- the name of the person/company, address and the VAT number of the company
- the name and phone number of the contact person
- email address and the imprint of the password

### **4.2. Collected data through the operation of the system:**

Those data generated by the User's computer during using the service provided by the website. The Controller's system collect these data automatically. These data are automatically logged without explicit statement of the User after every signing in and out of the website. These data cannot be connected with other personal data of the User unless otherwise provided by an Act. These data are accessible only by the Processor.

### **4.3. Cookies**

The Operator uses cookies to recognise the Customer's browser or device and could be able to enhance the browsing experience. Cookies do not keep or collect personal data.

By using the site, the Customer or Visitor agrees the using of cookies.

## **5. The legal basis, purpose and method of the processing**

The data processing is based on the voluntary, explicit consent of the User on the ground of appropriate information given by the Controller.

The legal basis of the data processing is the voluntary consent of the User based on Section 5. Articles 1 Point a) part of the Act CXII of 2011 on the right to informational self-determination and on the freedom of information.

The purpose of the personal data processing is to provide services through the [www.lvt.hu](http://www.lvt.hu) webshop.

The range of data varies depending on the certain service is being used by the User.

The purposes of the automatically recorded data are to improve the website, to offer personalised advertisements and newsletters, to make statistics and to protect the rights of the Users.

The Controller could use the data provided by the User to form user's groups and to visualize personalized ads to these groups on the website.

The Controller could not use the personal data other purposes than those written above. Personal data can be transferred to designated third parties or authorities - unless otherwise provided by an Act and making it obligatory – by the expressed, preliminary consent of the User.

The Controller monitors the given personal data only if it is necessary, especially if their's true nature are questionable. The person who has given the data is exclusively responsible for the veracity of those data. By giving an email address the giver takes full responsibility to the exclusive usage of and any other activity through said email address.

## **6. Principles relating to processing of personal data**

Personal data shall be collected and processed fairly and lawfully. Personal data may be processed only to the extent and for the period of time necessary to achieve its purpose. The storing method of the personal data shall be limited to those which make the identification of the User only during the time of the purpose of the data processing.

The Processor and the Controller shall implement appropriate technical and organisational measures, such as pseudonymisation, where appropriate to avoid accidental or unlawful deletion, destruction, loss, processing,

accessing, modifying or spreading of personal data. Those measures shall be reviewed regularly and updated appropriately where necessary.

## **7. Policies relating to the protection of personal data**

The Controller uses only those personal data unnecessary to the usage of the webshop and given voluntarily by the recipients.

The L.V. Technik Ltd, as the Controller takes responsibility for handling the personal data according to the Act CXII of 2011 and this policy and not handing over them to third parties, except the parcel service company who can handle the following personal data:

- company name, if the User gives a contact person name, the name of this person
- shipping address
- phone number
- email address

but only to be able to fulfil the shipping of the parcel.

The Controller could transfer those statistical data from which the identity of the User cannot be definable.

The L.V. Technik Ltd. could collect data about the activity of the Users, however those data shall not be connected with the identity, personal data or any other data of the Users.

The Controller shall make an explicit, unambiguous statement about the method, purpose and the principles of the processing before it registers, records or handles any personal data.

In case of an obligatory provision of data, the Controller shall mark the enacting act. The statement shall specify the controllers and the processors or refer to the exact part of the act.

In every case when the registering, recording and handling of the data are not obligatory, the Controller shall emphasize the voluntariness of the provision of data.

In every case when the given personal data are used beside the original purpose, the Controller shall inform the User and needs its prior, explicit permission to be able to act like that or shall provide an opportunity to forbid the usage.

Every information is given through the email address given by the User. No sanction is used against those who are not willing to give the voluntary provision of data.

If the personal data do not suit to reality and the correct data is available for the Controller, the Controller rectifies it.

The Controller shall block the personal data if the User asks it or it is presumable that the deleting could harm the rights of the User.

The Controller shall inform the User about the rectifying, blocking and deleting of the personal data. Those shall be informed as well to whom the data were forwarded.

## **8. The duration of the processing**

The processing of the data given by the User remains until the User unsubscribe of the service. The data of the deletion is the eighth day from the arrival of the deletion demand. In case of using unlawful or deceptive personal data or committing crime by the User, or attacking the system, the Controller is authorized to delete the registration of the User. In case of suspicion of a crime offence or civil law responsibility the Controller could keep the data during the legal procedure.

The User is entitled to ask the Controller in writing to cancel the processing of the data without unsubscribe of the service. This kind of cancellation does not affect the User's right to use the services provided by the Controller, however some services are bound to personal data, therefore those are not able to be used by the User without those data. The cancellation shall take place in 8 days from the arrival of the request.

The automatically generated data are stored as long as they are useful for the operating of the system.

## **9. Determination of personal data**

Any modification or deletion of personal data shall be notified explicitly in writing by the User through the email address of the Controller or on the profile site of the User. After the modification or deletion of the personal data the modified or deleted data could not be restored.

The User can unsubscribe the newsletter on its profile site or clicking on the button in the downbar of the newsletter.

## **10. Processing**

The L.V. Technik Ltd. does not use third party processor. It process every personal data by itself.

## **11. Transmitting of data**

The L.V. Technik Ltd. shall transmit every data according to legal obligation based on acts or authority's decisions.

Amennyiben az L.V. Technik Kft. az [lv.hu](http://lv.hu) oldalon található tartalomszolgáltatás üzemeltetését vagy hasznosítását részben vagy egészben harmadik személy számára átadja, úgy az általa kezelt személyes adatokat, ezen harmadik személy számára külön hozzájárulás kérése nélkül hiánytalanul átadhatja további kezelésre. Ezen Adattovábbítás kizárólag a már regisztrált Felhasználók regisztrációjának folyamatos voltát szolgálhatja, azonban a jelen Adatkezelési Szabályzat mindenkor hatályos szövegében megjelölt adatkezelési és adatbiztonsági szabályoknál hátrányosabb helyzetbe a Felhasználót nem hozhatja.

Az L.V. Technik Kft. az Adattovábbítás jogszerűségének ellenőrzése, valamint az érintett tájékoztatása céljából adattovábbítási nyilvántartást vezet, amely tartalmazza az általa kezelt személyes adatok továbbításának időpontját, az Adattovábbítás jogalapját és címzettjét, a továbbított személyes adatok körének meghatározását, valamint az Adatkezelést előíró jogszabályban meghatározott egyéb adatokat.

## **12. Modifying this Privacy Policy**

The L.V. Technik Ltd. has the right to modify this privacy policy anytime unilaterally. The Controller informs every user about this modification either in newsletter or in a pop-up window. The User by continue to use the site after this information, accepts the modification. Separate acceptance is not needed.

## **13. The User's rights with its personal data**

The User can ask for information about the personal data processed by the L.V. Technik Ltd. anytime in writing (either through post or email). If the User asks information in email it is only valid if the email address is the same as the one registered by the User.

The Processor has 30 days to give the information. In case of an email, the deadline starts at the first workday after receiving the email.

## **14. Right enforcement possibilities of the User**

The right enforcement possibilities of the User could be found in the Act CXII of 2011. The User could turn to the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest Szilágyi Erzsébet fasor 22/C; postacím: 1530 Budapest, Pf. 5.). Beside this the Controller is willing to answer any question or observation of the User ([info@lvtechnik.hu](mailto:info@lvtechnik.hu)).

## **15. Applicable law:**

- a) Act CXII of 2011 on the right to informational self-determination and on the freedom of information
- b) Act V of 2013 on the Civil Code
- c) az 1995. évi CXIX. törvény a kutatás és közvetlen üzletszerzés célját szolgáló név- és lakcímadatok kezeléséről,

- d) az 1998. évi VI. törvény az egyének védelméről a személyes adatok gépi feldolgozása során, Strasbourgban, 1981. január 28. napján kelt Egyezmény kihirdetéséről,
- e) a 2008. évi XLVIII. törvény a gazdasági reklámtevékenység alapvető feltételeiről és egyes korlátairól.

**16. Data of the web service provider of the lvt.hu website:**

Name of web service provider: Amazon Com.Inc

Headquarter: 410 Terry Ave. North, Seattle, WA 98109-5210

Phone: 00 1 206-266-2992

Website: [www.aws.amazon.com](http://www.aws.amazon.com)