

Privacy Policy

Last Updated: 30/09/2025

MVM PARTS EXPERT LTD (“we,” “Company,” or “us”) is committed to protecting your privacy and personal data. This privacy policy explains how we collect, use, process, store, and protect Personal Data (the “**Privacy Policy**”) when you visit or use our website <https://www.mvmpartsexpert.com/> (the “**Website**”) and/or interact with us through our Services, including Requests for Parts, Quotes and any other related communications. By using our Website or Services, you acknowledge that you have read, understood, and agreed to this Privacy Policy.

1. Definitions

For the purposes of this Privacy Policy:

"User" or "You" – Refers to any individual or entity accessing or using the Website, submitting Requests for Parts, or otherwise interacting with the Services.

"Services" – Encompasses all services offered by the Company, including but not limited to: submitting Requests for Parts by Users, facilitating communication with Suppliers, providing Quotes to Users, processing accepted Quotes, arranging delivery of Parts, and any other related guidance, updates, or support in connection with the Website.

"Suppliers" – Refers to third-party providers of construction and earthworks machinery spare parts engaged by the Company in order to provide Quotes, availability information, and delivery of Parts.

"Requests" – Refers to forms submitted by Users on the Website specifying the machinery type, model, and required Parts, for the purpose of obtaining Quotes from Suppliers and potentially purchasing such Parts.

"Quotes" – Refers to the official response provided by the Company to a User’s Request, containing pricing, availability, delivery details, and any other relevant information regarding the requested Parts, as supplied by the Company to the User’s designated email address or other contact method, as applicable.

"Parts" – Refers to construction and earthworks machinery spare parts, including components for excavators, loaders, dozers, tractors, cranes, forklifts, and other relevant equipment supplied by Suppliers.

"Personal Data" – Any information that can identify a User, directly or indirectly, including contact details, processed in accordance with applicable data protection laws including GDPR and national legislation.

1. WHO WE ARE

MVM PARTS EXPERT LTD is a limited liability company registered in the Republic of Cyprus, registration number HE 481783, with its registered address at 12 Chatzimichali Street, Kato Polemidia, 4151 Limassol, Cyprus. We operate the Website and provide Services related to Requests for Parts, Quotes, and liaison with Suppliers. For questions regarding this Privacy Policy, please contact us at info@mvmpartsexpert.com.

2. PERSONAL DATA WE COLLECT

2.1 For the purposes of providing the Services, fulfilling Requests, issuing Quotes, arranging delivery of Parts, processing payments, and ensuring compliance with applicable legal and regulatory requirements, the Company may collect, process, store, and use certain categories of Personal Data relating to Users.

The scope of Personal Data collected may vary depending on the nature of the interaction with the Website, the Services requested, and the legal obligations applicable to the Company.

2.2 The categories of Personal Data that may be collected include, without limitation, the following:

- Identity Data: Name, username, or other identifiers.
- Contact Data: Email address, phone number, and postal address.
- Financial Data: Payment information, credit/debit card details, bank details.
- Transaction Data: Order history, Requests submitted, Quotes accepted, and invoices.
- Technical Data: IP address, browser type, operating system, device type, and website usage data.
- Profile Data: Preferences, feedback, and user account information.
- Marketing and Communications Data: Consent and preferences for receiving marketing messages.
- Other Data: Any information you provide when interacting with the Website or Services.

3. DATA COLLECTION METHODS

3.1 The Company may collect Personal Data through multiple channels and methods, both directly and indirectly, depending on the User's interaction with the Website, the Services, and any communications with the Company or its Suppliers. Data may be collected through the following lawful means:

(a) Direct Interactions with Users

Personal Data may be voluntarily provided by Users when:

- submitting Requests for Quotes or placing orders for Parts through the Website or by contacting the Company directly;
- completing forms, including the Request, and any other form may be reasonably requested from time to time;
- communicating with the Company by email, phone, live chat, or other channels;
- participating in surveys, promotional campaigns, or marketing opt-in programs offered by the Company; or
- exercising data protection rights by submitting requests under GDPR or other applicable legislation.

Such data may include Identity Data, Contact Data, Financial Data, and Transaction Data, as well as any information voluntarily disclosed by the User in correspondence with the Company.

(b) Automated Collection via Website and Services

When Users interact with the Website or Services, certain Technical Data and Usage Data may be automatically collected using technologies such as:

- Cookies: small data files stored on the User's device that record preferences, authentication details, and browsing behavior;
- technical logs of activity, including IP addresses, timestamps, page requests, and error reports;
- unique device information that may include hardware models, operating systems, browser plugins, and language preferences;
- software or third-party services (such as web analytics providers) that collect aggregated statistical information about User interaction and navigation patterns.

(c) Third-Party Sources

(d) Legal and Regulatory Authorities

3.2 The Company ensures that all methods of data collection are conducted lawfully, transparently, and fairly in accordance with Article 5 GDPR. Where required by law, explicit User consent will be sought prior to the collection or processing of Personal Data for specific purposes, including marketing communications or the use of non-essential cookies.

3.3 Users are notified, at the time of collection, of the categories of data being collected, the purpose of collection, and the legal basis for such processing, except where such disclosure is not required under applicable data protection laws (for example, where disclosure would seriously impair the achievement of the processing purpose, or where the User already possesses the relevant information).

4. LEGAL BASES FOR PROCESSING

We process Personal Data on the following legal bases:

- Performance of a contract (e.g., processing Requests, Quotes, and payments);
- Compliance with legal obligations;
- Legitimate interests, such as improving Services, website security, fraud prevention, and dispute resolution;
- Consent, for marketing communications or other optional processing.

5. PURPOSES OF DATA PROCESSING

5.1 The Company processes Personal Data only for specified, explicit, and legitimate purposes. Personal Data will not be further processed in a manner incompatible with those purposes, except where permitted or required by law. The primary purposes for which Personal Data may be used include, without limitation:

- Provide and facilitate our Services, including processing Requests, generating Quotes, coordinating with Suppliers, providing access to the Website and Services and ensuring the proper functioning of the Website and Services and arranging delivery of Parts;
- Communicate with Users regarding Requests, Quotes, order status, updates, and support;
- Process payments, invoices, and other financial transactions;
- Ensure compliance with legal, tax, and regulatory obligations;
- Maintain the security, functionality, and proper operation of the Website;
- Detect, prevent, and investigate fraud, unlawful activities, or security breaches;
- Send marketing communications, where consent is provided.

6. MARKETING AND OPT-OUT OPTIONS

6.1 The Company may process certain categories of Personal Data, including Identity Data, Contact Data, Usage Data, and Marketing and Communication Data, for the purpose of sending Users marketing communications, promotional offers, newsletters, service updates, or other information that may be of interest. Such communications may be delivered by email, SMS, telephone, or other electronic means permitted by law.

6.2 Marketing communications will only be sent:

- (a) where the User has provided explicit consent to receive such communications; or
- (b) where the Company has an existing relationship with the User in respect of the Services, and the communication concerns products, services, or offers similar to those previously provided, in accordance with applicable law.

6.3 Users have the right to opt out of receiving marketing communications at any time. Opt-out mechanisms include, but are not limited to:

- (a) following the “unsubscribe” or “opt-out” link provided in any electronic marketing message;
- (b) contacting the Company directly at info@mvmultipartexpert.com with a clear request to withdraw consent or opt out.

6.4 Even where a User opts out of marketing communications, the Company reserves the right to continue sending service-related communications that are strictly necessary for the performance of the Services, including but not limited to communications regarding Quotes, order confirmations, payment receipts, delivery updates, or security notifications.

7. CHANGE OF PURPOSE

The Company will only collect and process Personal Data for the specific purposes for which it was originally obtained, as set out in this Privacy Policy. These purposes include, but are not limited to, the provision of Services, the processing of Requests and Quotes, communication with Users, fulfilment of contractual obligations, compliance with legal or regulatory requirements, and improvement of the Website and Services.

8. DISCLOSURE OF PERSONAL DATA

8.1 The Company may disclose or otherwise make available Personal Data to third parties strictly on a need-to-know basis and only to the extent necessary for the purposes set out in this Privacy Policy and the Terms. Such disclosures are made in accordance with applicable data protection laws and subject to

appropriate contractual and security safeguards.

8.2 Categories of potential recipients of Personal Data include, without limitation:

(a) Suppliers and Service Providers, including but not limited to suppliers of Parts, logistics companies, IT hosting providers, payment processors, and other third parties engaged to assist in fulfilling Requests, processing Quotes, arranging deliveries, or maintaining the proper functioning of the Website and Services.

(b) Employees and Contractors – of the Company who are duly authorised and trained, and who require access to Personal Data in order to perform their duties in relation to the provision of the Services. Such access is restricted to the minimum amount of data necessary and is subject to strict internal confidentiality obligations.

8.3 In each case, the Company ensures that Personal Data is disclosed only for legitimate and lawful purposes, and that appropriate contractual or organisational measures (including data processing agreements where required under the GDPR) are in place to safeguard the confidentiality, integrity, and security of such data.

9. INTERNATIONAL DATA TRANSFERS

Personal Data may be transferred outside the European Economic Area (“EEA”). Transfers are safeguarded through mechanisms such as Standard Contractual Clauses or equivalent legal safeguards to ensure adequate protection.

10. DATA SECURITY

10.1 The Company implements and maintains appropriate technical and organizational measures to ensure a level of security appropriate to the risks associated with the collection, storage, and processing of Personal Data. These measures are designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored, or otherwise processed.

10.2 Security measures may include, but are not limited to: encryption, pseudonymization, secure servers, firewalls, intrusion detection systems, regular vulnerability testing, access controls, multi-factor authentication, secure data backups, and monitoring of data processing systems.

10.3 Access to Personal Data is strictly limited to the Company’s employees, officers, contractors, and authorized third parties who have a legitimate business need to access such data in order to perform their duties in connection with the provision of the Services. All such persons are bound by confidentiality obligations, whether contractual or statutory, and are required to process Personal Data in accordance with the Company’s instructions and applicable data protection laws.

10.4 While the Company takes reasonable steps to safeguard Personal Data, Users acknowledge that no method of transmission over the internet or method of electronic storage is entirely secure. Accordingly, the Company cannot guarantee absolute security and shall not be held liable for any unauthorized access or use that is beyond its reasonable control.

11. DATA RETENTION

11.1 The Company retains Personal Data only for as long as is strictly necessary to fulfil the specific purposes for which it was collected, including but not limited to: processing Requests, generating and executing Quotes, coordinating with Suppliers, delivering Parts, complying with contractual obligations, or providing the Services.

11.2 In determining the appropriate retention period for Personal Data, the Company considers the nature, sensitivity, and volume of the Personal Data, the potential risk of harm from unauthorized use or disclosure, the purposes for which the Personal Data was collected, the necessity of maintaining such data for legitimate business operations, and applicable legal, regulatory, tax, and accounting requirements.

11.3 Personal Data may be retained for longer periods in the event of actual or potential disputes, investigations, audits, or legal proceedings, where the Company has a legitimate interest in retaining the data to establish, exercise, or defend legal claims.

11.4 Once the applicable retention period has expired, the Company shall ensure that the Personal Data is securely deleted, anonymized, or otherwise rendered irreversibly inaccessible in accordance with industry

best practices and applicable law.

12. USER RIGHTS

12.1 In accordance with applicable data protection laws, including but not limited to the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and any relevant national legislation, Users are granted specific rights in relation to their Personal Data. The Company is committed to ensuring that Users can effectively exercise these rights, subject to any limitations or conditions imposed by law.

12.2 The rights of Users include, without limitation, the following:

- (a) Right of Access – Users have the right to obtain confirmation as to whether or not Personal Data concerning them is being processed, and, where that is the case, to access such Personal Data and receive a copy together with information relating to its processing.
- (b) Right to Rectification – Users have the right to request the correction or updating of any inaccurate, incomplete, or outdated Personal Data held by the Company.
- (c) Right to Erasure (“Right to be Forgotten”) – Users have the right to request the deletion of their Personal Data where there is no longer a lawful basis for its retention or processing. This right is subject to limitations, such as where data must be retained to comply with legal obligations, establish, exercise, or defend legal claims, or for legitimate business purposes.
- (d) Right to Restriction of Processing – Users may request that the Company restrict the processing of their Personal Data in certain circumstances, for example, if the accuracy of the data is contested, or the processing is unlawful but the User opposes deletion.
- (e) Right to Data Portability – Users may request to receive their Personal Data in a structured, commonly used, and machine-readable format and have the right to transmit such data to another data controller, provided the processing is based on consent or contract and carried out by automated means.
- (f) Right to Object – Users have the right to object at any time to the processing of their Personal Data where such processing is based on the Company’s legitimate interests, including direct marketing. In such cases, the Company will cease processing unless it demonstrates compelling legitimate grounds that override the interests, rights, and freedoms of the User, or where the processing is necessary for legal claims.
- (g) Right to Withdraw Consent – Where processing is based on the User’s consent, the User may withdraw consent at any time, without affecting the lawfulness of processing carried out prior to such withdrawal.

(h) Right to Lodge a Complaint – Users have the right to lodge a complaint with the relevant data protection supervisory authority if they believe their rights under data protection laws have been violated.

12.3 The Company will respond to any valid request to exercise User rights without undue delay and in any event within the timeframes prescribed by applicable law. The Company reserves the right to request verification of the User’s identity before acting on any request, in order to prevent unauthorized access to Personal Data.

12.4 Requests relating to the exercise of User rights may be submitted to the Company at the contact details specified in Section 15 below, at: info@mvmupartexpert.com

13. COOKIES AND TRACKING TECHNOLOGIES

13.1 The Website may use cookies and similar tracking technologies (collectively, “**Cookies**”) to enhance the User experience, improve the functionality and performance of the Website and Services, and collect statistical information about usage patterns. Cookies are small data files stored on the User’s device when accessing the Website, which allow the Website to recognize the User’s browser, remember preferences, and provide a more personalized experience.

13.2 The categories of Cookies used may include, without limitation:

- (a) Strictly Necessary Cookies – Cookies essential for the operation of the Website and the provision of Services. These enable core functions such as security, authentication, and access to secure areas of the Website. Disabling these Cookies may render certain parts of the Website inoperable.
- (b) Functional Cookies – Cookies that enable the Website to remember choices made by the User (such as language preferences, location, or login details) in order to provide enhanced and more personalized

features.

(c) Performance and Analytics Cookies – Cookies that collect information about how Users interact with the Website, including the most frequently visited pages, time spent on the Website, and error messages received. These Cookies are used to improve the performance and functionality of the Website and Services.

(d) Advertising and Targeting Cookies – Cookies that may be used to deliver relevant advertisements to Users, track the effectiveness of advertising campaigns, and limit the number of times an advertisement is displayed. These Cookies may also be placed by third-party advertising networks with the Company’s authorization.

(e) Social Media Cookies – Cookies that allow Users to share Website content through third-party social networking platforms and enable those platforms to track interactions with such content.

13.4 Users may choose to manage or disable Cookies by adjusting their browser settings. However, please note that disabling or refusing Cookies may limit access to certain features or functionality of the Website, and some Services may not function properly without essential Cookies.

13.5 Where third-party Cookies are used, such as those provided by analytics or advertising service providers, the Company does not control these third parties and shall not be responsible for their privacy practices. Users are encouraged to review the privacy policies of third-party service providers for further information about how their data is collected and processed.

13.6 The Company may also use other tracking technologies, including but not limited to web beacons, pixel tags, and device fingerprinting, for similar purposes as Cookies, such as measuring Website traffic, monitoring engagement with content, and ensuring the proper functioning of the Services.

13.7 By continuing to use the Website without disabling Cookies, the User consents to the placement and use of Cookies and similar technologies in accordance with this Privacy Policy and applicable laws.

14. CHANGES TO THIS PRIVACY POLICY

14.1 The Company reserves the right to modify, amend, or update this Privacy Policy at any time to reflect changes in legal obligations, operational practices, or the functionality of the Website and Services. Any updates or revisions will be effective immediately upon posting on the Website, with the “Last Updated” date amended accordingly.

14.2 The Company encourages Users to review this Privacy Policy periodically to remain informed about how their Personal Data is collected, used, stored, and shared. Continued use of the Website or Services following the posting of any changes constitutes the User’s acknowledgment, acceptance, and agreement to be bound by the revised Privacy Policy.

14.3 In cases where changes materially affect the processing of Personal Data or the rights of Users under applicable data protection laws, the Company may, where legally required, provide additional notice to Users via email, notifications on the Website, or other appropriate communication channels.

15. Contact Information

15.1 For any inquiries, questions, complaints, or requests to exercise your data protection rights, including access, correction, erasure, restriction, objection, data portability, or withdrawal of consent, Users may contact the Company using the details provided below:

MVM PARTS EXPERT LTD

Company Registration Number: HE 481783

Registered Address: 12 Chatzimichali Street, Kato Polemidia, 4151 Limassol, Cyprus

Email: Info@mvmpartsexpert.com