



PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF SUPPLIERS

PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 (GDPR) AND APPLICABLE ITALIAN DATA PROTECTION LEGISLATION

Regulation (EU) 2016/679 ("GDPR") and the applicable Italian data protection legislation lay down the rules governing the protection of natural persons with regard to the processing of personal data, in accordance with the principles of lawfulness, fairness, transparency and confidentiality.

Pursuant to Article 13 GDPR, this privacy notice provides Data Subjects with the information required to ensure fair and transparent processing of their personal data.

The Data Controller reserves the right to amend this privacy notice at any time, informing Data Subjects through its website or by any other appropriate means.

Where the Supplier is a legal entity, this privacy notice is intended for the natural persons involved in the relevant processing activities, including the Supplier's legal representatives, employees, collaborators, consultants and contact persons whose personal data may be communicated to, accessed by or otherwise processed by the Data Controller in connection with the establishment, execution and management of the contractual relationship with the Supplier.

The Supplier is requested to make this privacy notice available to the relevant Data Subjects.

DEFINITIONS

For the purposes of this privacy notice, **personal data** means any information relating to an identified or identifiable natural person ("Data Subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more elements specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

Special categories of personal data means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

Processing means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction.

DATA CONTROLLER

The Data Controller is **SUITE TIME S.R.L.**, with registered office at Via Giovanni Porzio 4, Centro Direzionale Isola G1, 80143 Naples, Italy, and operational office at Via Provinciale Anacapri 7, 80073 Capri (NA), Italy, Tax Code and VAT No. 08575691210, represented by its legal representative. The Data Controller may be contacted at the following details:

SUITE TIME S.R.L.

Registered Office: Via Giovanni Porzio 4, Centro Direzionale Isola G1, Napoli - CAP 80143 - Italy

Operational Office: Via Provinciale Anacapri 7, Capri (NA) – CAP 80143

Tel.: +39 081 17763078

E-mail: info@suitetime.house

Certified e-mail (PEC): suitetime@legalmail.it

PERSONAL DATA PROCESSED

The personal data processed may include personal data relating to the Supplier, where the Supplier is a natural person, or to the Supplier's legal representatives, employees, collaborators, consultants and contact persons, where the Supplier is a legal entity.

In particular, the Data Controller may process the following categories of personal data:

- identification data, such as first name, surname, place and date of birth, tax code, VAT number, company role or professional position;
- contact details, such as telephone number, e-mail address, certified e-mail address and business address;
- contractual and administrative data relating to the establishment, execution and management of the contractual relationship;
- accounting, tax and payment data, including bank details, invoicing data and information necessary for payment management;
- data contained in correspondence, communications, contractual documents, orders, invoices and other records relating to the supplier relationship;
- any additional data required under applicable tax, accounting, anti-money laundering, anti-corruption or counter-terrorism legislation, where applicable.

SEDE OPERATIVA: Via Provinciale Anacapri 7, 80073 Capri (NA)

SEDE LEGALE: Via G. Porzio 4, Centro Direzionale IS G1 80143

Tel: + 39 081 177 63078

Email: info@suitetime.house

P.IVA 08575691210



The Data Controller does not intend to process special categories of personal data within the scope of supplier management. Should such processing become necessary, Data Subjects will be provided with specific information and an appropriate legal basis under Articles 6 and 9 GDPR will be identified.

PURPOSES OF PROCESSING AND LEGAL BASIS

Personal data are processed for the following purposes:

- a) management of pre-contractual communications, negotiations and preliminary activities relating to the possible establishment of a contractual relationship;
- b) execution, performance and management of contracts, purchase orders, supply agreements and related administrative activities;
- c) management of procurement activities relating to goods and services;
- d) administrative, accounting, tax and payment management;
- e) fulfilment of legal, regulatory and tax obligations to which the Data Controller is subject;
- f) compliance with obligations arising from applicable national and/or European legislation, including, where applicable, anti-money laundering, anti-corruption and counter-terrorism legislation;
- g) management of correspondence and communications connected with the supplier relationship;
- h) protection of the Data Controller's rights and interests, including the management of complaints, disputes and legal claims.

The legal bases for the processing are as follows:

For the purposes referred to in points a) and b), where the Data Subject is a party to the contract, processing is necessary for the performance of a contract to which the Data Subject is party or for the implementation of pre-contractual measures taken at the request of the Data Subject, pursuant to Article 6(1)(b) GDPR.

Where the Data Subject acts as legal representative, employee, collaborator, consultant or contact person of the Supplier, the legal basis for the purposes referred to in points a), b), c) and g) is the legitimate interest of the Data Controller in establishing, executing and managing the contractual relationship with the Supplier, pursuant to Article 6(1)(f) GDPR.

For the purposes referred to in points d), e) and f), processing is necessary for compliance with legal obligations to which the Data Controller is subject, pursuant to Article 6(1)(c) GDPR.

For the purpose referred to in point h), the legal basis is the legitimate interest of the Data Controller in protecting its rights and interests, including in judicial or extrajudicial proceedings, pursuant to Article 6(1)(f) GDPR.

NATURE OF THE PROVISION OF PERSONAL DATA

The provision of personal data is optional but necessary for the establishment, execution and management of the contractual relationship with the Supplier.

Failure to provide the data necessary for the purposes indicated above may make it impossible to establish, execute or manage the supplier relationship, to fulfil legal obligations or to process payments and related administrative activities.

PROCESSING METHODS AND DATA RETENTION

Personal data are processed in compliance with EU and Italian data protection legislation, the principles set out in Article 5 GDPR and the confidentiality obligations binding authorised personnel.

Processing is carried out using paper-based, electronic and IT tools, with methods suitable to ensure the security, integrity and confidentiality of personal data.

Personal data are retained for the period necessary to achieve the purposes for which they were collected and, in any case, for the periods required by applicable law. In particular, personal data relating to supplier relationships are retained for the entire duration of the contractual relationship and, after its termination, for a period of 10 years, in accordance with applicable civil, accounting and tax retention obligations.

In the event of complaints, disputes or legal proceedings, personal data may be retained for the time necessary to protect the Data Controller's rights and until the final resolution of the dispute.

Personal data are processed only by personnel who need access to such data by reason of their duties or organisational role within SUITE TIME S.R.L. Roles and responsibilities are clearly allocated, and access levels and processing activities are defined through procedures and operational instructions provided to authorised personnel, who are adequately trained and regularly updated on data protection matters, potential risks and responsibilities connected with the processing of personal data.

The Data Controller adopts appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including measures aimed at preventing unauthorised access, unlawful or incorrect use, loss, alteration or disclosure of personal data.

Personal data are not subject to automated decision-making or profiling within the meaning of Article 22 GDPR. Should such processing activities be introduced in the future, Data Subjects will be provided with specific information and, where required, an appropriate legal basis will be identified.

Where a personal data breach is likely to result in a high risk to the rights and freedoms of Data Subjects, the Data Controller shall notify the Data Subjects without undue delay, pursuant to Article 34 GDPR.

SEDE OPERATIVA: Via Provinciale Anacapri 7, 80073 Capri (NA)

SEDE LEGALE: Via G. Porzio 4, Centro Direzionale IS G1 80143

Tel: + 39 081 177 63078

Email: info@suitetime.house

P.IVA 08575691210



RECIPIENTS OF PERSONAL DATA

Personal data are not disclosed to unidentified recipients.

Personal data may be communicated, where necessary and solely for the purposes indicated in this privacy notice, to the following categories of recipients:

- authorised and trained personnel of SUITE TIME S.R.L.;
- tax, accounting, legal and business consultants;
- banks and payment service providers;
- software providers, IT service providers and system maintenance providers;
- public authorities, supervisory authorities, judicial authorities and other public bodies, where required by law;
- third parties providing services to SUITE TIME S.R.L. in connection with the management of the supplier relationship.

Where necessary, third parties processing personal data on behalf of the Data Controller are appointed as Data Processors pursuant to Article 28 GDPR.

TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Personal data are not transferred outside the European Economic Area.

Should such transfer become necessary, it will take place only in compliance with the conditions set out in Chapter V of the GDPR and subject to the adoption of appropriate safeguards, where required.

RIGHTS OF THE DATA SUBJECT

Data Subjects may exercise the rights provided for under Articles 15 to 22 GDPR by contacting SUITE TIME S.R.L. at one of the Data Controller's contact details indicated above.

In particular, Data Subjects have the right to:

- obtain access to their personal data;
- request the rectification of inaccurate personal data;
- request the erasure of personal data, where the conditions provided for by law are met;
- request the restriction of processing;
- receive the personal data concerning them in a structured, commonly used and machine-readable format, where applicable;
- object to the processing of their personal data, where the processing is based on legitimate interest;
- withdraw consent at any time, where processing is based on consent, without affecting the lawfulness of processing based on consent before its withdrawal;
- not be subject to a decision based solely on automated processing, including profiling, where applicable.

SUITE TIME S.R.L. is required by law to respond to such requests within one month of receipt, unless an extension is permitted under Article 12 GDPR.

The exercise of these rights is, in principle, free of charge. The Data Controller may request the information necessary to verify the identity of the applicant.

This is without prejudice to the Data Subject's right to lodge a complaint with the competent supervisory authority pursuant to Article 77 GDPR, or to bring proceedings before the competent judicial authority pursuant to Article 140-bis of Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018.

NAPLES, MAY 2026

THE DATA CONTROLLER

SEDE OPERATIVA: Via Provinciale Anacapri 7, 80073 Capri (NA)

SEDE LEGALE: Via G. Porzio 4, Centro Direzionale IS G1 80143

Tel: + 39 081 177 63078

Email: info@suitetime.house

P.IVA 08575691210