



PRIVACY NOTICE FOR GUESTS OF THE ACCOMODATION ESTABLISHMENT

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 fairness, lawfulness, transparency and confidentiality.

Pursuant to Article 13 GDPR, this privacy notice provides guests of the accommodation establishment 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.

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, Capri (NA), 80073, 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 Data Controller processes the following categories of personal data relating to guests:

- personal details: first name, surname, gender, date and place of birth, nationality;
- identification details: details of identity documents or passports required for guest identification under public security regulations;
- contact details: telephone number and e-mail address;
- booking and stay details: arrival and departure dates, number of guests, preferences and requested services;
- tax and payment details: tax code, invoicing data and payment-related information;
- special categories of personal data, where voluntarily provided by the guest, such as allergies, disabilities or specific needs.

PURPOSES OF PROCESSING AND LEGAL BASIS

Personal data are processed for the following purposes:

- a) management of reservations and hospitality services, including check-in, check-out, invoicing, customer assistance and related services;
- b) compliance with legal obligations in tax, accounting and administrative matters;
- c) identification of guests and transmission of personal data to the Public Security Authorities for public safety purposes, pursuant to Article 109 of Royal Decree No. 773/1931 (IULPS), the Ministerial Decree of 7 January 2013, as amended by the Ministerial Decree of 16 September 2021, through the official "Alloggiati Web" portal;
- d) management of complaints, disputes or legal claims;
- e) technical management and security of Wi-Fi access provided to guests, including access logging, prevention of misuse and cooperation with the competent Authorities;
- f) processing of special categories of personal data voluntarily provided by guests, such as allergies, disabilities or specific needs, in order to accommodate such needs and safeguard guests' health during their stay.

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

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

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The legal basis for the respective purposes are:

- a) performance of a contract to which the Data Subject is party, pursuant to Article 6(1)(b) GDPR;
- b) compliance with legal obligations, pursuant to Article 6(1)(c) GDPR;
- c) compliance with legal obligations relating to public security, pursuant to Article 6(1)(c) GDPR, Article 109 TULPS and the Ministerial Decree of 7 January 2013, as amended by the Ministerial Decree of 16 September 2021;
- d) the legitimate interest of the Data Controller in protecting its rights and interests, pursuant to Article 6(1)(f) GDPR;
- e) the legitimate interest of the Data Controller in ensuring network security and cooperating with the competent authorities, pursuant to Article 6(1)(f) GDPR, the Italian Data Protection Authority Resolution No. 46/2006 and Article 132 of Legislative Decree No. 196/2003;
- f) the explicit consent of the Data Subject, including, in the case of minors, consent given by the person exercising parental responsibility, pursuant to Article 9(2)(a) GDPR.

PROCESSING METHODS AND DATA RETENTION

Personal data are processed exclusively for the purposes indicated above, in compliance with EU and Italian legislation, the principle of data minimisation and the confidentiality obligations binding authorised personnel.

Processing is carried out using electronic and/or manual tools suitable to ensure the security and confidentiality of personal data, in accordance with the GDPR.

Personal data are retained for the period necessary to achieve the purposes for which they were collected and in accordance with applicable legal and administrative retention requirements.

In particular, personal data are retained as follows:

- a) for hospitality services: 24 months following the end of the stay;
- b) for tax, accounting and administrative purposes: 10 years from the relevant accounting record;
- c) for communication to the Public Security Authorities: for the time strictly necessary to comply with the legal obligation. The Data Controller does not retain copies or images of guests' identity documents. Only the receipt confirming successful submission through the institutional portal is retained for 5 years, in order to demonstrate compliance with the legal obligation;
- d) in the event of complaints, disputes or legal proceedings: 10 years from the date on which the judgment becomes final;
- e) for Wi-Fi access logs: 6 months, unless otherwise requested by the competent authorities;
- f) for special categories of personal data voluntarily provided by guests: until the end of the stay, subject to any applicable legal obligations.

The Data Controller does not retain paper or electronic copies, photographs, scans or other images of guests' identity documents submitted or shown during the check-in process, except where strictly necessary for the immediate acquisition of the data required to comply with the legal obligation to transmit guest information to the Public Security Authorities.

Where check-in operations are carried out using electronic devices capable of temporarily capturing an image of the identity document, such images are used exclusively to extract the data required for legal compliance and are deleted immediately after the transmission to the Public Security Authorities has been completed.

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.

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.

RECIPIENTS OF PERSONAL DATA

Personal data are not disclosed to unidentified recipients, except where required by law or regulation.

Personal data may be communicated, in addition to duly authorised internal personnel, to public bodies and institutional entities where required by law and solely for the purposes indicated in this privacy notice.

Personal data may also be communicated to third parties, whether natural or legal persons, acting on behalf of the Data Controller. Where necessary, such parties are appointed as Data Processors pursuant to Article 28 GDPR.

In particular, personal data may be communicated to:

In particular, the data may be disclosed to:

- Public Security Authorities;
- the Italian Revenue Agency and other public bodies;
- tax, legal and IT consultants;
- software providers, Wi-Fi service providers and management system providers;
- providers of digital check-in services;
- authorised and trained personnel.

Personal data are not disseminated and are not transferred outside the European Economic Area, unless adequate safeguards are in place in accordance with the GDPR.

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RIGHTS OF THE DATA SUBJECT

In order to exercise the rights provided for under Articles 15 to 22 GDPR, the Data Subject may contact SUITE TIME S.R.L. by submitting a request to the legal representative at one of the Data Controller's contact details indicated above.

The Data Subject has the right to obtain access to his or her personal data at any time. In particular, the Data Subject may request the rectification or erasure of personal data, the restriction of processing in the cases provided for by law, the withdrawal of consent previously given and the portability of the data concerning him or her. The Data Subject may also object to the processing of his or her personal data, stating the reasons for the objection.

SUITE TIME S.R.L. is required by law to respond to such requests within one month. The exercise of these rights is, in principle, free of charge, without prejudice to any costs connected with the reproduction of documents. 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

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SUMMARY OF THE PRIVACY NOTICE

1. Data Controller: SUITE TIME S.R.L. Registered Office: Via Giovanni Porzio 4, Centro Direzionale Isola G1, Napoli - CAP 80143 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	2. Rights of the Data Subject: ▪ right of access to personal data, pursuant to Art. 15 GDPR; ▪ right to rectification pursuant to Art. 16 GDPR; ▪ right to erasure, pursuant to Art. 17 GDPR; ▪ right to restriction of processing, pursuant to Art. 18 GDPR; ▪ right to data portability, pursuant to Art. 20 GDPR; ▪ right to object, pursuant to Art. 21 GDPR; ▪ right not to be subject to a decision based solely on automated processing, including profiling, pursuant to Art. 22 GDPR.	
CONSENT TO THE PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA	DATA SUBJECT'S CONSENT	
Processing of any special categories of data voluntarily provided (e.g. allergies, disabilities or specific needs) in order to protect guests' health and to provide appropriate services during their stay.	☐ YES	☐ NO
The undersigned (in the case of a minor, the person exercising parental responsibility over the minor) declares that he/she has received full information pursuant to Article 13 of Regulation (EU) 2016/679 and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018, and freely gives consent, as indicated above, to the processing of his/her personal data for the purpose and for the retention period set out in the privacy notice.		

Place

Date

Signature of the Data Subject

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