



PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA IN RELATION TO THE USE OF VIDEO SURVEILLANCE SYSTEMS

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 govern the protection of natural persons with regard to the processing of personal data, in compliance with the principles of fairness, lawfulness and transparency, and impose a series of obligations on anyone processing information relating to other parties.

In compliance with the obligations set forth under Article 13 GDPR regarding the need to provide Data Subjects with information and the necessary details to ensure fair and transparent processing of personal data, this privacy notice is hereby provided. The Data Controller reserves the right to amend this notice at any time, informing the Data Subjects thereof through its website.

This privacy notice supplements the simplified privacy notice provided to Data Subjects through the signs displayed before the area covered by the video surveillance cameras installed inside the Data Controller's premises.

DEFINITIONS

The GDPR defines "personal data" as 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 to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

The GDPR defines "special categories of personal data" as data capable of revealing: health status, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data relating to genetic data, biometric data, sexual life, sexual orientation or judicial data.

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

DATA CONTROLLER

The Data Controller is **SUITE TIME S.R.L.**, with registered office in Via Giovanni Porzio 4, Centro Direzionale Isola G1, Napoli, CAP 80143, Italy and operational office in Via Provinciale Anacapri 7, Capri (NA), CAP 80143 C.F. e P.I. 08575691210, in the person of its legal representative pro tempore. The Data Controller's contact details are as follows:

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 by the Data Controller through the video surveillance systems installed at its operational headquarters consist of images that may potentially depict the Data Subject, where he/she enters the area covered by the surveillance cameras.

PURPOSES OF PROCESSING AND LEGAL BASIS

The processing of personal data is carried out for the following purposes, pursuant to the GDPR, the Provision of the Italian Data Protection Authority on video surveillance of 8 April 2010, and the European Data Protection Board (EDPB) Guidelines 3/2019 of 10 July 2019:

- Protection of the integrity of the assets of SUITE TIME S.R.L., through video surveillance systems that record images;
- Protection of the safety of customers, employees, visitors and persons authorised, for any reason, to access the premises of SUITE TIME S.R.L., through video surveillance systems that record images.

The processing does not pursue any purpose of remote monitoring of employees and the images collected will not be used in any way within disciplinary proceedings against employees.

For the purposes indicated above, the legal basis is the pursuit of the legitimate interest of the Data Controller pursuant to Article 6(1)(f) GDPR and the performance of a task carried out in the public interest pursuant to Article 6(1)(e) GDPR.

PROCESSING METHODS AND DATA RETENTION

The images recorded by the cameras forming part of the video surveillance system and transmitted to a server and video recording devices located inside the Data Controller's premises, in an area accessible only to authorised personnel, are processed through electronic/IT tools, in full compliance with applicable legislation and according to the principles of lawfulness, necessity, purpose limitation, relevance and proportionality with respect to the purposes for which the images are processed.

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 processing of images, including their deletion, is carried out by applying security measures aimed at ensuring the confidentiality of the Data Subject to whom the data relate and preventing unlawful access by third parties or unauthorised personnel, in compliance with the requirements set forth by the Italian Data Protection Authority in the above-mentioned Provision on video surveillance of 8 April 2010.

Personal data are retained for a period of time not exceeding the purposes for which they are collected and processed and, in any case, for no longer than 48 hours. The data are also protected – through appropriate security procedures – in the event of technical maintenance and assistance activities involving IT equipment and related processing procedures.

All personal data are processed exclusively by personnel who have access to such data due to their duties or hierarchical position within SUITE TIME S.R.L. In this regard, a widespread allocation of responsibilities is provided for, and the levels of access and activities relating to the data are defined through procedures and operating instructions provided to authorised personnel, who are adequately trained and constantly updated on privacy-related matters, potential risks and responsibilities associated with data processing.

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

The images may be communicated to parties which, where strictly provided for by law, may access such data pursuant to legal provisions and within the limits established by applicable legislation (such as, for example, law enforcement authorities and competent authorities in the event of criminal offences). In any case, the images are not disclosed nor, except as indicated above, communicated to third parties.

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 addressed to the legal representative pro tempore at one of the Data Controller's contact details indicated above.

The Data Subject has the right to access, at any time, the personal data concerning him/her. In particular, the Data Subject may request the rectification, erasure, restriction of processing of such data in the cases provided for by law, withdrawal of consent previously given, and portability of the data concerning him/her. The Data Subject may also submit an objection to the processing of personal data, providing the reasons justifying such objection.

SUITE TIME S.R.L. has, by law, a period of one month to respond to such requests.

The exercise of rights is, in principle, free of charge, without prejudice to any costs related to the reproduction of documents.

The Data Controller has the right to request information necessary to verify the identity of the applicant.

The right to lodge a complaint with the supervisory authority pursuant to Article 77 GDPR or to bring proceedings before the competent judicial authority pursuant to Article 140-bis of the Italian Data Protection Code, as amended by Legislative Decree No. 101/2018, remains unaffected

NAPLES, MAY 2026

THE DATA CONTROLLER

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