



INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA OF EMPLOYEES AND VARIOUS COLLABORATORS PURSUANT TO ART. 13 EU REGULATION 679/2016 (GDPR) AND RELEVANT ITALIAN LEGISLATION

The EU Regulation 679/2016 ("GDPR") and the relevant Italian legislation govern the protection of natural persons regarding the processing of personal data, in compliance with the principles of fairness, lawfulness, and transparency. They impose a series of obligations on those who process information relating to other individuals.

In compliance with Article 13 of the GDPR, which requires data subjects to be informed and provided with the necessary information to ensure fair and transparent data processing, this notice is provided. The Data Controller reserves the right to make changes at any time and will inform Data Subjects via its website.

DEFINITIONS

- ☐ **"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, ID number, location data, online identifier, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.
- ☐ **"Special categories of personal data"** include data revealing health status, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning genetics, biometrics, sex life or sexual orientation, or judicial data.
- ☐ **"Processing"** means any operation or set of operations, performed with or without automated means, upon personal data, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, alignment, restriction, erasure, or destruction.

DATA CONTROLLER

The Data Controller is SUITE TIME S.R.L., located at Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples, CAP 80143, VAT and Tax Code 08575691210, represented by its legal representative pro tempore.

Contact details:

SUITE TIME S.R.L.

Registered Office: Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples – CAP 80143

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

Tel.: +39 081 17763078

Email: info@suitetime.house

PEC: suitetime@legalmail.it

TYPES OF DATA COLLECTED

The processing concerns personal, identification, and contact data necessary for executing and managing employment and/or other types of contractual relationships between the Data Controller and the Data Subjects (employees, consultants, and other professionals). The processing may also involve special categories of data (e.g., tax, judicial, health-related, union membership) as required by law or for company oversight needs.

PURPOSES AND LEGAL BASIS FOR PROCESSING

The Data Controller will process data for the management and execution of employment contracts or other collaborative relationships, in compliance with legal obligations and for purposes related to institutional activities.

Specifically, personal data will be processed for:

- Administrative, managerial, and accounting activities tied to employment;

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- Verification of requirements for specific roles or termination conditions;
- Legal obligations for payroll and compensation;
- Obligations toward social security and welfare institutions;
- Contract execution and related financial management;
- Insurance obligations for workplace safety and liability;
- Anti-corruption and transparency obligations (Law 190/2012, Legislative Decree 33/2013);
- Health surveillance under Legislative Decree 81/2008;
- Audits and inspections, including conflict-of-interest assessments;
- Legal protection in civil, criminal, and administrative proceedings.

The legal bases for data processing are:

- Contract performance (Art. 6(1)(b) GDPR);
- Legal obligation (Art. 6(1)(c) GDPR);
- Public interest (Art. 6(1)(e) GDPR);
- Employment law obligations (Art. 9(2)(b) GDPR);
- Public interest (Art. 9(2)(g) GDPR);
- Occupational health and fitness assessment (Art. 9(2)(h) GDPR).

Additional processing purposes will be communicated through a separate notice, and specific consent will be requested where necessary.

METHODS OF PROCESSING AND DATA RETENTION

Data will be processed only for the stated purposes, in accordance with applicable EU and national regulations, and respecting confidentiality. Processing may be manual or electronic, ensuring security and confidentiality. Data will be retained for the time necessary to fulfill processing purposes, and at least 10 years after the end of the working relationship.

Only authorized personnel will have access to data, based on roles and responsibilities, and all staff are trained and updated on privacy practices.

Technical safeguards are in place to protect data during maintenance or IT operations, preventing data loss, unauthorized access, and misuse. There will be no automated profiling (Art. 22 GDPR) unless specifically consented to.

In the event of a data breach with high risk to individual rights, the Data Controller will inform the Data Subjects without undue delay (Art. 34 GDPR).

DATA DISCLOSURE AND DISSEMINATION

Personal data will not be disclosed to unspecified parties, except as required by law. It may be shared with public authorities or external data processors acting on behalf of the Data Controller.

Possible recipients include:

- Public institutions (e.g., INPS, INAIL);
- Private entities with contracts with SUITE TIME S.R.L.;
- Banks and insurance companies;
- Third parties indicated by the Data Subject (e.g., pension funds);
- IT service providers;
- Judicial authorities;
- Supervisory bodies;
- Training and certification entities;
- Trade unions the Data Subject has joined;
- Occupational health physicians;
- External consultants.

Data will not be transferred outside the European Economic Area unless specifically required, with proper safeguards and consent.

DATA SUBJECT RIGHTS

Data Subjects can exercise their rights under Articles 15–22 of the GDPR by contacting SUITE TIME S.R.L. through the provided contacts. These rights include access, rectification, deletion, restriction of processing, data portability, and objection to processing, with a one-month response time.

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Exercising rights is generally free, subject to potential reproduction costs. The Data Controller may require proof of identity. Data Subjects may also lodge complaints with the Data Protection Authority (Art. 77 GDPR) or pursue judicial remedies (Art. 140-bis of the Italian Privacy Code).

NAPLES, MAY 2025

THE DATA CONTROLLER

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