



INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA REGARDING THE USE OF VIDEO SURVEILLANCE SYSTEMS PURSUANT TO ART. 13 OF EU REGULATION 2016/679 (GDPR) AND RELEVANT ITALIAN LEGISLATION

EU Regulation 679/2016 ("GDPR") and the applicable Italian laws regulate the protection of natural persons with regard to the processing of personal data, ensuring principles of fairness, lawfulness, and transparency. They impose a series of obligations on those who process information referring to other individuals.

In compliance with the obligations under Article 13 of the GDPR to inform data subjects and provide the necessary information to ensure a fair and transparent processing of personal data, this notice is provided. The Data Controller reserves the right to amend this information at any time, informing data subjects via its website.

This extended notice supplements the simplified information provided through signs placed before the cameras' field of view within the premises of the Data Controller.

DEFINITIONS

According to the GDPR:

- **"Personal data"** means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable 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 characteristics of their physical, physiological, genetic, mental, economic, cultural, or social identity.
- **"Special categories of personal data"** include data revealing health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, sexual life or orientation, or judicial data.
- **"Processing"** refers to any operation or set of operations carried out on personal data, whether or not by automated means, including collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, 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, Naples, 80143, and operating office at Via Provinciale Anacapri 7, Capri (NA), 80143, Italy. Tax/VAT Code: 08575691210, represented by the legal representative pro tempore.

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



Contact Information:

- **Registered Office:** Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples – 80143
 - **Operating Office:** Via Provinciale Anacapri 7, Capri (NA) – 80143
 - **Tel:** +39 081 17763078
 - **Email:** info@suitetime.house
 - **PEC:** suitetime@legalmail.it
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TYPES OF DATA COLLECTED

The personal data processed through the video surveillance systems at the operational premises are images that may depict the Data Subject when entering the cameras' field of view.

PURPOSES AND LEGAL BASIS OF PROCESSING

Personal data are processed for the following purposes, in accordance with the GDPR, the Italian Data Protection Authority's Decision on Video Surveillance (April 8, 2010), and the EDPB Guidelines 3/2019 (July 10, 2019):

- Protecting the property and assets of SUITE TIME S.R.L. via video surveillance systems that record images;
- Ensuring the safety of clients, employees, visitors, and anyone legally allowed access to the premises.

Data processing is not intended for remote employee monitoring, and recorded images will not be used for disciplinary actions.

The legal basis for such processing is the **Data Controller's legitimate interest** (Article 6(1)(f) GDPR) and the **performance of a task in the public interest** (Article 6(1)(e) GDPR).

METHODS AND STORAGE OF PROCESSING

Images recorded by surveillance cameras, stored on servers and recording devices located in secure areas of the Data Controller's premises, are processed using electronic/IT tools, strictly adhering to legal standards and principles of lawfulness, necessity, purpose, relevance, and non-excessiveness.

Images are securely deleted and processed using safety measures to ensure confidentiality and prevent unauthorized access, in accordance with the Data Protection Authority's guidelines (April 8, 2010).

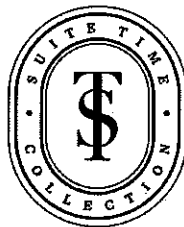
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Images are retained **for no more than 48 hours**, unless circumstances legally justify a longer period. Security protocols also apply during maintenance and technical servicing.

Access to personal data is limited to authorized personnel based on their role or hierarchical position. Responsibilities and activity levels are defined by operational procedures, and personnel receive ongoing privacy training.

If a personal data breach poses a high risk to the rights and freedoms of individuals, the Data Controller will inform the Data Subject without undue delay (Art. 34 GDPR).

DATA RECIPIENTS

Images may be communicated to parties legally authorized to access such data (e.g., law enforcement or judicial authorities), but will not otherwise be disclosed or shared with third parties.

DATA SUBJECT RIGHTS

To exercise the rights under Articles 15–22 of the GDPR, the Data Subject may contact SUITE TIME S.R.L. via the contact details provided.

Data Subjects have the right to access their data at any time. They may request rectification, erasure, restriction of processing, withdraw consent, data portability, or object to processing by providing justification.

SUITE TIME S.R.L. must respond within **one month**. Requests are generally free of charge, except for costs of reproduction.

The Data Controller may request additional information for identification purposes.

Data Subjects also have the right to file a complaint with the supervisory authority (Art. 77 GDPR) or pursue legal action (Art. 140-bis of the Italian Data Protection Code, amended by Legislative Decree 101/2018).

NAPLES, JUNE 2025

THE DATA CONTROLLER

Suite Time S.r.l.
L'Amministratore Unico
Francesco Giosuè Gifuni

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