



INFORMATION NOTICE ON THE PROCESSING OF SUPPLIERS' PERSONAL DATA PURSUANT TO ART. 13 OF EU REGULATION 2016/679 (GDPR) AND APPLICABLE ITALIAN LAW

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

In accordance with Article 13 GDPR and the need to inform data subjects and provide the information necessary to ensure fair and transparent processing, this information notice is provided. The Data Controller reserves the right to make changes to this notice at any time, notifying data subjects via its website.

In the case of relationships between legal entities, as is currently the case between the Controller and the Supplier, this notice is provided to any data subjects (e.g., employees, collaborators, or other representatives) whose personal data may be disclosed to or processed by the Controller during the execution of the main relationship. The Supplier undertakes to ensure that the data subjects are fully informed of the essential elements of this privacy notice.

DEFINITIONS

According to the GDPR:

- **"Personal data"**: any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, by reference to identifiers such as name, ID number, location data, online identifier, or other characteristics of identity.
- **"Special categories of personal data"**: 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"**: any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, storage, consultation, use, disclosure, erasure, or destruction.

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



The Data Controller is **SUITE TIME S.R.L.**, with registered office at Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples, 80143, Italy (VAT/C.F. 08575691210), represented by its legal representative pro tempore.

Contact Details:

- **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

DATA PROCESSED, PURPOSES, AND LEGAL BASIS

The data processed include personal information of the Supplier's legal representative and/or collaborators, employees, or contacts such as name, surname, phone number, email address, and in general contact data necessary to provide services for entering into, executing, and managing the contractual relationship between the Controller and the Supplier. This also includes data required by tax, anti-money laundering, anti-corruption, and anti-terrorism laws.

The data are used in the context of contract negotiation, execution, and management for the sole purpose of SUITE TIME S.R.L.'s institutional activities.

Data are stored in paper and electronic archives relating to past, current, and potential supplier relationships.

More specifically, in accordance with Article 6 GDPR:

- a) Pre-contractual communications and negotiations;
- b) Contract execution and management, including administrative processing of payments;
- c) Procurement management of goods and services;
- d) Administrative, accounting, and tax management of SUITE TIME S.R.L.;
- e) Exercise of the Controller's legal rights (e.g., legal defense);
- f) Compliance with national and EU legal obligations;
- g) Fulfillment of duties toward financial and tax authorities.

Legal bases:

- For a) and b): contract performance or pre-contractual measures (Art. 6(1)(b) GDPR).
- For c), d), and e): legitimate interests of the Controller (Art. 6(1)(f) GDPR).

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- For f) and g): legal obligation to which the Controller is subject (Art. 6(1)(c) GDPR).

Providing personal data is optional, but necessary for the establishment and management of the contractual relationship. Failure to provide data will make it impossible to proceed with business relations.

Additional purposes will be communicated in a separate notice and, if required, specific consent will be obtained, particularly if special categories of data are processed.

METHODS OF PROCESSING AND DATA RETENTION

Data will be processed in full compliance with EU and national legislation.

Processing will be both manual and automated, with appropriate security measures to ensure confidentiality and integrity, including use of IT tools.

Data will be stored only for the time needed to achieve the purposes for which they were collected, and in any case:

- For the **duration of the contract**;
- And for **ten years** following contract termination;
- Longer in the case of legal disputes.

Only authorized personnel of SUITE TIME S.R.L., based on their role or hierarchical position, will process the data. Roles and responsibilities are assigned via internal procedures and operational instructions, and personnel receive ongoing privacy training.

Security measures are also applied during technical support and maintenance of IT systems. The Controller ensures legal data protection standards are met to prevent data loss, unauthorized access, and unlawful processing.

There is **no automated profiling** as per Art. 22(1) and (4) GDPR. Should profiling be adopted in the future, consent will be requested in advance.

If a data breach occurs posing a high risk to rights and freedoms, the Controller will notify the affected data subjects without undue delay (Art. 34 GDPR).

DATA RECIPIENTS

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Personal data will not be disclosed to unspecified parties. They may, however, be shared with institutional authorities where required by law, and with third parties contractually engaged by SUITE TIME S.R.L., who will be designated as external processors.

Data will not be transferred outside the European Economic Area (EEA) unless required, in which case appropriate safeguards and consent will be ensured.

DATA SUBJECT RIGHTS

Data subjects may exercise their rights under Articles 15–22 GDPR by submitting a request to the Controller using the contact details provided.

They have the right to access, rectify, erase, restrict, or object to the processing of their data. They can also withdraw consent and request data portability. SUITE TIME S.R.L. must respond within one month.

Exercise of these rights is generally free. The Controller may request additional information to verify identity.

Complaints may be submitted to the supervisory authority (Art. 77 GDPR) or brought before a court (Art. 140-bis of the Italian Data Protection Code, as 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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