



**PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA
FOR THE MANAGEMENT OF GUEST DATA OF THE FACILITY
PURSUANT TO ART. 13 EU REG. 2016/679 (GDPR) AND APPLICABLE ITALIAN LEGISLATION**

The EU Regulation 679/2016 (“GDPR”) and the applicable Italian legislation regulate 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 those who process information referring to other subjects.

In compliance with the obligations set out in Art. 13 GDPR regarding the need to inform Data Subjects and to provide the necessary information to ensure the fair and transparent processing of personal data, this privacy notice is provided. The Controller reserves the right to make changes to it at any time, notifying Data Subjects via its website.

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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The GDPR defines “special categories of personal data” as data revealing: health status, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as data concerning genetic, biometric data, sex life or sexual orientation, or judicial data.

The GDPR defines “processing” as any operation or set of operations which is performed on personal data or on 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 at Via Giovanni Porzio 4, Centro Direzionale Isola G1, Naples, ZIP 80143, and operational office at Via Provinciale Anacapri 7, Capri (NA), ZIP 80143, Tax Code and VAT No. 08575691210, represented by its legal representative pro tempore.

Controller’s contact details are as follows:

SUITE TIME S.R.L.

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

Operational Office: Via Provinciale Anacapri 7, Capri (NA) – ZIP 80143

Tel.: +39 081 17763078

Email: info@suitetime.house

Certified Email (PEC): suitetime@legalmail.it

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



TYPES OF DATA COLLECTED

The personal data of guests processed by the Controller are the following:

- Personal details: first name, last name, date and place of birth;
- Identification data: details and copy of ID document or passport;
- Contact details: phone number, email address;
- Stay data: check-in and check-out dates, number of guests, preferences, requested services;
- Tax and payment data: tax code, billing information;
- Any special categories of data: e.g., allergies, disabilities or specific needs, only if voluntarily provided.

PURPOSES OF PROCESSING AND LEGAL BASIS

Personal data will be processed for the following purposes:

- a) Management of bookings and accommodation (including check-in/out, invoicing, customer service, requested services);
- b) Compliance with legal obligations in tax, accounting, and administrative matters;
- c) Communication of personal data to Public Security Authorities for public safety purposes (guest registration forms);
- d) Management of any complaints, disputes, or legal claims;
- e) Technical management and security of access to the Wi-Fi network offered to guests (access logs, protection against misuse, possible cooperation with Authorities);
- f) Possible processing of special categories of data voluntarily provided (e.g., allergies, disabilities, specific needs) to safeguard the guests' health and to provide appropriate services during their stay.

The legal basis for each purpose is as follows:

- a) Performance of a contract to which the data subject is party (Art. 6, para. 1, lit. b) GDPR);
- b) Compliance with legal obligations (Art. 6, para. 1, lit. c) GDPR);
- c) Legal obligation to communicate data to Public Security Authorities (Art. 6, para. 1, lit. c) GDPR – Art. 109 R.D. 773/1931 (TULPS), Ministerial Decree 7/1/2013);
- d) Legitimate interest of the Controller in judicial or extrajudicial protection (Art. 6, para. 1, lit. f) GDPR);
- e) Legitimate interest in network security and cooperation with Authorities (Art. 6, para. 1, lit. f) GDPR; Data Protection Authority Resolution no. 46/2006; Art. 132 Italian Privacy Code (Legislative Decree 196/2003));
- f) Explicit consent of the data subject, provided by the person exercising parental responsibility in the case of a minor (Art. 9, para. 2, lit. a) GDPR).

METHODS OF PROCESSING AND DATA RETENTION

Data will be processed exclusively for the purposes indicated above, in full compliance with the European and national legislation and the confidentiality obligations to which all personnel are bound, taking into account the principle of data minimization.

Processing will be carried out using tools that ensure security and confidentiality and may also be carried out using IT tools. Processing will be carried out in an automated and/or manual form, in accordance with the GDPR. Data will be retained for the time necessary to achieve the purposes for which they are collected and processed, also according to management needs and applicable

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regulatory obligations, and in compliance with rules on the retention of administrative documentation.

Specifically, for the purpose referred to in letter:

- a) 24 months after the end of the stay;
- b) 10 years from accounting registration;
- c) For the time necessary to comply with the legal obligation of communication, except for tax and accounting purposes;
- d) In case of litigation, 10 years from the final judgment;
- e) 6 months, unless requested otherwise by the Authorities;
- f) Until the end of the stay, unless legal obligations apply.

All personal data will be processed exclusively by personnel who have access due to their role or hierarchical position within SUITE TIME S.R.L. To this end, responsibilities are widely distributed, and activity levels on data are defined through procedures and operational instructions for the appointed staff, who are adequately trained and constantly updated on privacy matters, potential risks, and responsibilities related to data processing.

If a data breach is likely to present a high risk to your rights and freedoms, the Controller shall communicate the breach to the Data Subjects without undue delay (Art. 34 GDPR).

RECIPIENTS OF PROCESSING

The Controller will not disclose personal data to unspecified parties except in cases provided for by law or regulation, but will communicate them, in addition to previously authorised internal staff, to public bodies by virtue of legal obligations and only for the indicated purposes, to institutional subjects.

In particular, data may be communicated to:

- Public Security Authorities;
- Revenue Agency and other public bodies;
- Tax, legal, and IT consultants;
- Software, Wi-Fi, and management system providers;
- Authorised and instructed personnel.

Data will not be disseminated or transferred outside the European Economic Area unless adequate safeguards are in place.

DATA SUBJECT'S RIGHTS

To exercise the rights provided for by Articles 15 to 22 of the GDPR, the Data Subject may contact SUITE TIME S.R.L. by submitting a request to the legal representative pro tempore at any of the Controller's contacts listed above.

The Data Subject has the right to access their personal data at any time. In particular, they may request rectification, erasure, restriction of processing in cases provided for, withdrawal of consent given, and portability of their data. The Data Subject may also object to the processing of data by submitting a request specifying the reasons justifying the objection. SUITE TIME S.R.L. has, by law, one month to respond to requests.

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The exercise of rights is, in principle, free of charge, except for any costs of reproduction.
The Controller has the right to request information necessary to identify the applicant.

The Data Subject retains the right to lodge a complaint with the Supervisory Authority pursuant to Art. 77 GDPR or to bring proceedings before the Judicial Authority pursuant to Art. 140-bis of the Italian Privacy Code, as amended by Legislative Decree No. 101/2018.

Naples, July 2025

THE DATA CONTROLLER

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INFORMATION SUMMARY**

1. Data controller: SUITE TIME S.R.L. Sede Legale: Via Giovanni Porzio 4, Centro Direzionale Isola G1, Napoli - CAP 80143 Sede Operativa: Via Provinciale Anacapri 7, Capri (NA) – CAP 80143 Tel.: +39 081 17763078 E-mail: info@suitetime.house PEC: suitetime@legalmail.it	2. Rights of the interested party: 3. ☐ right of access to data (ex. Art. 15 GDPR); 4. ☐ right of rectification (ex. Art. 18 and erasure of data (ex. Art. 17); 5. ☐ right to restriction of processing (ex. Art. 18); 6. ☐ right to data portability (ex. Art. 20); 7. ☐ right to object (ex. Art. 21); 8. ☐ right not to be subjected to an automated decision-making process, relating to natural persons, including profiling (ex. Art. 22).	
PURPOSE OF THE PROCESSING	CONSENT OF THE INTERESTED	
Any processing of special data provided voluntarily (e.g. allergies, disabilities or specific needs) to protect the health of guests and provide adequate services during their stay.	☐ YES	☐ NO
The undersigned (in the case of a minor, exercising parental responsibility over the minor) declares to have received complete information pursuant to art. 13 of EU Reg. 2016/679 and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 and expresses consent, as identified here for each specific purpose, to the processing of his/her personal data for the purposes and duration specified in the information.		

Place

Date

Signature of the interested

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