

# Privacy Policy

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## Introduction

The personal data of users accessing the portal are processed in full compliance with Italian and European privacy regulations.

Pursuant to Article 13 of European Regulation No. 679/2016, P.T.C. Porto Turistico di Capri S.p.A., as the "Data Controller," is required to provide you with information regarding the use of the personal data you have provided.

P.T.C. Porto Turistico di Capri S.p.A. ensures that your personal data is processed in accordance with fundamental rights and freedoms and your dignity, particularly with regard to confidentiality, personal identity, and the right to personal data protection.

## Identity and Contact Details of the Data Controller

The Data Controller is P.T.C. Porto Turistico di Capri S.p.A., represented by Dr. Fabrizio De Maddi as legal representative.

Address: Piazza Umberto I - 80073 Capri (NA) Italy

VAT/Tax Code: 06118920633

PEC (certified email): portoturistodicapri@pec.it

Phone: +39 081 8377602

## Data Protection Officer (DPO)

P.T.C. Porto Turistico di Capri S.p.A. has appointed Attorney Marisa Del Vecchio as Data Protection Officer.

Address: Via Francesco Netti, 6 – Naples, Italy

Email: marisa@studiolegaledelvecchio.com

PEC: legalnet@pec.it

## Purpose of Data Processing

Your personal data will be processed solely for the execution of contracts for the provision of services and professional activities, and for the fulfillment of administrative, accounting, and tax obligations, as well as for compliance with laws, regulations, EU rules, and orders from authorized authorities and supervisory bodies.

The legal basis for the processing depends on:

If the Client is a natural person:

- The necessity to execute the contract, under Article 6(1)(b) GDPR;
- Legal obligations, under Article 6(1)(c) GDPR;

If the Client is a legal entity:

- The legitimate interest of the Data Controller in processing personal data of employees, representatives, or directors to fulfill the contract, under Article 6(1)(f) GDPR;
- Legal obligations, under Article 6(1)(c) GDPR.

Therefore, your personal data will only be processed to the extent necessary to manage the relationship between the Data Controller and the company you represent.

## **Methods of Data Processing**

P.T.C. Porto Turistico di Capri S.p.A. processes personal data using electronic and/or paper tools, including automated systems for storing, managing, and transmitting data, in compliance with security and confidentiality measures, and adhering to the principles of data minimization and fairness.

## **Authorized Personnel**

For the purposes outlined above, your data may be processed by employees, collaborators, and similar personnel of the Data Controller, who are specifically authorized and trained according to Article 29 of GDPR and Article 2-quaterdecies of Legislative Decree 196/2003 (as amended by Legislative Decree 101/2018).

Data may also be communicated to:

- a) Service providers (technical, logistical, operational);
- b) IT and telecommunication service providers, including those responsible for system maintenance;
- c) Legal, tax, accounting, or privacy consultants;
- d) Administrative, judicial, and regulatory authorities, as required by law.

These entities may act as:

- Data Processors, under Article 28 of GDPR;
- Independent Data Controllers.

A complete list of third parties is available upon request via email: [direttore@portoturistodicapri.com](mailto:direttore@portoturistodicapri.com).

### **Data Processors**

The organization may rely on third parties to carry out tasks involving personal data. These parties must demonstrate adequate experience, capacity, and reliability in ensuring data protection, including data security. They are formally appointed as "Data Processors."

### **Disclosure and Distribution**

Your personal data may be communicated to individuals or entities (public/private) when necessary for the activities of P.T.C. Porto Turistico di Capri S.p.A., as allowed by laws or regulations. Your data will not be publicly disclosed, except as required by law.

### **Data Retention**

Your data will be stored no longer than necessary for the purposes described. Regular checks will ensure that only relevant and necessary data are retained. Excess or irrelevant data will not be used, except for lawful retention of related documents. After the procedure or service is complete, data will be kept according to administrative document retention laws.

### **Data Transfer Outside the EU**

Your personal data is not transferred outside the European Union.

### **Provision of Data**

Providing your data is optional but necessary to achieve the purposes mentioned. Failure to provide data will compromise the proper handling of the procedure or provision of the service.

### **Your Rights**

As a data subject, you have the right to:

- Request more information regarding this policy;
- Access your personal data;
- Request rectification or deletion, or restriction of processing;
- Object to processing;

- Request data portability, if applicable;
- File a complaint with the Data Protection Authority.

You can exercise your rights under Articles 15–22 of the GDPR by writing to:

P.T.C. Porto Turistico di Capri S.p.A.

Piazza Umberto I - 80073 Capri (NA), Italy

Email: [portoturistodicapri@pec.it](mailto:portoturistodicapri@pec.it)

Data Protection Authority

Piazza Venezia, 11 – IT-00187, Rome