

Notice on the Processing of Personal Data through Video Surveillance Systems

Pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR"), Hotel Royal Superga informs data subjects that certain areas of the property are subject to video surveillance.

This notice describes how and for what purposes personal data collected through the video surveillance system are processed.

1. Data Controller

Data Controller:

Hotel Royal Superga

ROYAL SUPERGA SRL

Via Pascal 3

12100 Cuneo (CN), Italy

VAT No. 02949260042

amministrazione@hotelroyalsuperga.com

hotelroyalsuperga@multipec.it

2. Areas Subject to Video Surveillance

The video surveillance system is installed to monitor certain areas of the property, including:

- reception;
- terrace;
- corridors;
- any other areas indicated by the relevant signage.

Cameras are positioned and used in compliance with the principles of necessity, relevance and data minimization, limiting recording to the areas necessary to pursue the purposes set out in this notice.

3. Purposes of Processing

Images are collected and recorded exclusively for purposes related to:

- protecting the safety of guests, visitors and other persons present on the property;
- preventing and detecting unauthorized access, theft, damage and other unlawful acts;
- protecting the Hotel's assets and property;
- any investigation of unlawful acts and protection of the Controller's rights.

Images are not used for commercial or marketing purposes, nor to monitor guests' habits.

4. Processing Methods

Images are recorded through the video surveillance system and stored on an internal hard drive located at the Hotel's premises.

Processing is carried out using electronic tools and in a manner suitable to ensure the security and confidentiality of personal data.

Access to the images is granted exclusively to persons authorized by the Controller, within the limits of their respective duties.

5. Legal Basis

The legal basis for the processing is Article 6(1)(f) GDPR, concerning the pursuit of the Controller's legitimate interest, represented by the protection of the safety of individuals and of the Controller's property, as well as the prevention and investigation of any unlawful acts.

Processing is carried out in compliance with the principles of necessity, proportionality, minimization and storage limitation.

6. Retention Period

Images are retained for a maximum period of 24 hours, unless further retention is necessary due to:

- specific requests from judicial authorities or law enforcement;
- the investigation or prosecution of an unlawful act;
- the exercise or defense of a right in legal proceedings.

In such cases, images may be retained for the time strictly necessary for the purposes requiring such retention.

The retention period has been determined in application of the principles of minimization and storage limitation set out in the GDPR. The Italian Data Protection Authority (Garante) notes that images must not be kept for longer than necessary in relation to the purposes pursued.

7. Parties Who May Access the Images

Images are accessible exclusively to personnel specifically authorized by the Data Controller and trained in data protection matters.

Images are stored on an internal hard drive located at the Hotel's premises and are not entrusted to external providers or third-party cloud services.

Images may be made available to judicial authorities or law enforcement exclusively in the cases and manners provided for by law.

8. Disclosure and Dissemination

Images are not disseminated and are not disclosed to third parties, except as provided by law or as necessary to comply with specific requests from the competent authorities.

9. Transfer of Data Outside the European Union

Images collected through the video surveillance system are stored exclusively on an internal hard drive located at the Hotel's premises, in Italy.

10. Rights of Data Subjects

In the cases provided for by Articles 15 et seq. of the GDPR, data subjects may exercise the rights recognized by data protection law, including the right to:

- obtain confirmation of whether personal data concerning them exists;
- request erasure of data in the cases provided for by law;
- request restriction of processing in the cases provided for by the GDPR;
- object to processing, in the cases provided for by Article 21 GDPR;

- lodge a complaint with the Data Protection Authority if they believe their data has been processed in violation of applicable law.

Given the nature of processing through video surveillance and the limited retention periods, requests concerning the exercise of rights over the images must be made promptly and in any event in time to allow the Controller to identify the relevant images before their deletion.

Requests may be sent to the Data Controller at the following contacts:

- amministrazione@hotelroyalsuperga.com
- hotelroyalsuperga@multipec.it
- ROYAL SUPERGA SRL, Via Pascal 3, 12100 Cuneo (CN), Italy

11. Right to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, any data subject who believes that the processing of their personal data violates the GDPR has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), in accordance with applicable law.

12. Updates to This Notice

This notice may be periodically updated in relation to regulatory, organizational or technical changes to the video surveillance system.

Last updated: October 1, 2026