

Policy for the Exercise of Data Subject Rights

Regulation (EU) 2016/679 (the GDPR) recognises a series of rights in favour of individuals in relation to the processing of their personal data and provides for specific protection measures to be implemented in certain circumstances.

This policy explains which rights can be exercised by data subjects. In addition, the Data Controller INDUPHARMA SRL explains the internal procedure for responding to requests to exercise these rights.

Under certain conditions, and subject to the limitations set out in Article 23 of the GDPR, data subjects have the right to:

§ **right of access (Article 15 of the GDPR):** to request confirmation that personal data is being processed and to receive a copy of the data being processed;

§ **right to rectification (Article 16 of the GDPR):** to request the modification or integration of the data provided;

§ **right to erasure (Article 17 of the GDPR):** to request the erasure of personal data;

§ **right to restriction of processing (Art. 18 GDPR):** the request that the data be marked in such a way as to restrict its processing in the future;

§ **right to data portability (Art. 20 GDPR):** to request that the data provided be transmitted, without hindrance, to the data subject or to another data controller indicated, using a structured, commonly used and machine-readable format;

§ **right to object (Art. 21 GDPR):** to object at any time to the processing of data, unless there are legitimate and prevailing reasons for proceeding with the processing.

How data subjects can exercise their rights

Data subjects can exercise their rights through the following communication channels:
privacy@indupharma.eu

The data subject can submit a request to the data controller without any particular formalities, by sending a simple communication by email or registered mail, taking care to indicate in the subject line that it concerns the 'Exercise of GDPR rights'.

The request may refer, depending on the requirements of the data subject, to specific personal data, categories of data or a particular processing operation, or to all personal data concerning the data subject, however processed.

Requests may also be submitted by data subjects through a third party with a specific, duly signed authorisation.

If the Data Controller has reasonable doubts about the identity of the natural person submitting the request to exercise their rights, they may request further information necessary to confirm the identity of the data subject (including a copy of a valid identity document).

The identity is considered certain or, in any case, proven if the data subject has provided a copy of their valid identity document or if they have indicated in the request a sufficient amount of information that can reasonably be assumed to be available exclusively to the data subject (e.g. email from an email address matching that indicated by the data subject elsewhere in their dealings with the Company).

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MANAGEMENT OF REQUESTS

Persons responsible for receiving requests

The persons responsible for receiving requests from data subjects and managing them will be those expressly designated and authorised by the Data Controller to manage the request.

Operating procedure

The management of requests to exercise the rights of data subjects involves the following steps:

a) Receipt of the request by the data subject

Upon receipt of a request, the persons in charge of receiving the request will immediately involve the internal privacy contact person, who will assign the assessment of the request to the persons authorised to process the relevant area.

b) Assessment and processing of the request

The Data Controller, in consultation with the DPO if necessary, will assess the validity of the request and take all necessary steps to respond to it.

The Data Controller may refuse the request:

§ if it proves that it cannot identify the Data Subject;

§ if the request is manifestly unfounded;

§ if the request is manifestly excessive or repetitive, in the sense that a reasonable period of time has not elapsed between similar requests, after assessing, in accordance with the EDPB guidelines: (i) the frequency with which the personal data of the data subject are processed and altered; (ii) the type of personal data; (iii) the purposes of the processing; and (iv) whether the different requests always concern the same personal data or processing operations.

If the request is unfounded, the Data Controller shall inform the applicant, within one month of receiving the request, of the rejection and the reasons for the refusal, as well as of the possibility of lodging a complaint with a supervisory authority and of seeking judicial remedy.

If, on the contrary, the request is legitimate, the necessary steps will be taken to comply with the request, as provided for in Articles 15 to 22 of the GDPR (e.g. rectification, integration, erasure, etc.).

c) Response to the data subject

The Data Controller will respond to requests from the data subject without undue delay and, in any case, **within one month**.

This period may be extended by two months, if necessary, due to the complexity and number of requests made by the data subject, or to obtain further clarification in order to identify the data subject.

In this case, the Data Controller will inform the data subject of the need for an extension and the reasons for it.

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The data subject will be notified using the same means of communication used to submit the request (e.g. email), unless otherwise specified by the data subject in the request or otherwise inferable.

The response will be concise, clear, transparent and intelligible.

6. Register of requests for the exercise of data subjects' rights

The documentation relating to requests submitted by data subjects will be kept in a specific register.

7. Costs for handling requests

Requests will be handled at no cost to the data subject.

However, if the requests are manifestly unfounded or excessive, the data controller may charge a reasonable fee.