



**Data Subject
Rights
Management
Procedure
pursuant
to Regulation
(EU)
No.679/2016
("GDPR")**



GDPR

Indice

1.	History of revisions	3
2.	Introduction	3
3.	Management of Subject Rights	4
4.	Subject Rights	6
5.	Restrictions on Data Subject Requests Under Italian Law	13
	ANNEX A – Request Form	14
	ANNEX B – Data Subject Requests Register Template	16

1. History of revisions

The version history of the document is shown below.
The most recent changes are listed first.

Version	Date	Major changes
1.0	APRIL 2026	First Release

2. Introduction

This procedure governs:

- the processes for receiving, identifying, evaluating, and referencing requests (“**Requests**”, each a “**Request**”) from data subjects (“**Data Subjects**”, each a “Data Subject”) regarding the exercise of their rights under Regulation (EU) No. 679/2016 (“**GDPR**”), as well as subsequent national implementing legislation (collectively, “**Privacy Legislation**”);
- the procedures for responding to data subjects’ requests promptly and correctly in accordance with the GDPR.
- the procedures and methods set forth in this policy apply to Coesia Group companies (hereinafter, the “**Group**” or, individually, the “**Company**”) when they act as data controllers (“**Controller**”).

Privacy Legislation requires that Data Subjects be facilitated in exercising their rights. Requests and related processing activities will be handled in compliance with applicable laws, as well as the principles of necessity, proportionality, and lawfulness of processing.

The recipients of this document are:

- all Companies;
- Companies’ personnel.

To help the Group to comply with the requirements of data protection laws, all employees must read and comply with the requirements set forth in this policy when performing data processing activities on behalf of the Group. Adherence to, compliance with, and implementation of the rules defined below is considered strategic and of fundamental importance to the Group. Violations may result in disciplinary sanctions.

The Group promotes periodic and/or mandatory training activities regarding the proper processing of personal data.

3. Management of Data Subject requests

Data Subjects may submit a Request to exercise the rights set forth in Article 15 of GDPR to the following email address: dpo@coesia.com.

For the purposes of this policy, the categories of Data Subjects are as follows:

- Employees;
- Users of the whistleblowing platform;
- Suppliers;
- Customers.

In response, the Company may recommend that the Data Subject submitting the Request completes the form in **Annex A**, for more efficient management and traceability of Requests. **IN ANY CASE, FAILURE BY THE DATA SUBJECT TO SEND ANNEX A WILL NOT RESULT IN AN EXTENSION OF THE TERMS FOR RESPONSE INDICATED BELOW.**

However, since the GDPR does not establish a specific format for submitting Requests, the **Company is also required to process Requests made through other channels or orally.**

Therefore, in light of the above, anyone within the Company who receives a Request must immediately report it by sending a communication to dpo@coesia.com.

Upon receipt of a Request, the Company must acknowledge receipt and evaluate it.

Data Subjects will receive confirmation of receipt of the Request within **7 days**, regardless of the form.

Example of Acknowledgement of Receipt

*Dear Data Subject,
Thank you for writing to us.*

We will review your request and provide you with a response as soon as possible, and in any case within 30 days.

*[To expedite the processing of your request, please complete the attached form]
Best regards,*

[Company name]

The General Counsel, in coordination with the DPO, is required to assess the legitimacy of the Requests and the amount of information to be provided in response. To this end, the General Counsel takes into account the following:

- restrictions on Requests, provided for by the GDPR (see below);
- restrictions on Requests provided for by local law (see point 4 below).

Requests must be fulfilled within **1 month of receipt**, extendable up to 3 months, taking into account the complexity and number of the Requests.

In the event of a refusal or delay in responding, the Data Subject will be informed of the delay **no later than one month after receiving the Request**, providing the reasons and informing the Data Subject of the possibility of filing a complaint with the competent supervisory authority, namely the Italian Data Protection Authority.

Example of delayed response notification

Dear Data Subject,

We inform you that your request is taking longer than expected due to [its complexity/ the high number of requests].

We confirm that we are analyzing your request and will revert to you within three months of your initial request.

We remind you that you always have the right to lodge a complaint with the Italian Data Protection Authority if you believe your rights have been violated.

The requested information is provided in written or other forms. When the Request is submitted electronically, the information is provided electronically, unless otherwise requested by the Data Subject. The requested information may be provided verbally only if the Data Subject's identity has been verified and a written report signed by the Data Subject is simultaneously drawn up.

All Requests, regardless of their outcome, are documented and stored in a centralized archive accessible only by the **General Counsel and/or Legal Team, DPO, and Local IT Contact**. They are retained for a period **not exceeding 5 years**, unless necessary to defend a right in court. The archive includes:

- date of the Requests;
- name of the Data Subject;
- type of Request;
- status of the Request;
- date of the Request closure (Annex B).

4. Data Subject Rights

Right of access

Data Subject has the right to obtain access to its own personal data, easily and within a reasonable timeframe, in order to understand the processing and assess its lawfulness. This right applies to all Data Subjects, who therefore have the right to obtain knowledge and information regarding the following:

- confirmation of whether or not their personal data is being processed;
- the following information:
 - (i) purposes of the processing,
 - (ii) the categories of personal data concerned;
 - (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;

Required Actions

It is unlikely that all the information requested by a Data Subject will be available in a single location.

Therefore, it is important:

- a. **The General Counsel** contacts the **IT Contact** to conduct a comprehensive search of all information concerning the Data Subject, unless the Data Subject has indicated that it wish to limit the scope of the search if it wish to receive a timely response. If data is stored in databases indexed with different

- (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (v) the existence of the right to request from the Controller rectification or erasure of personal data or the restriction of processing of personal data concerning him or her or the right to object to such processing;
- (vi) where the personal data are not collected from the Data Subject, any available information as to their source;
- (vii) the existence of automated decision-making, including profiling, and significant information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject;
- (viii) the right to lodge a complaint with the competent supervisory authority, namely the Italian Data Protection Authority.

Data Subjects must also obtain a **free copy of their personal data**.

The copy of the data must contain:

- Data provided voluntarily by the Data Subject (e.g., when contacting, or through correspondence or interaction with the Company);
- Observed data (including raw data) collected during use of the app, website, or services (e.g., activity logs such as access data, history of pages visited, location data, click activity, etc.);
- Any special categories of data or judicial data (e.g., health data, criminal record data);
- Data derived from other data, even if not directly provided by the Data Subject (e.g., diagnoses);

factors (e.g., customer number, name, or IP address), the data uniquely referring to the Data Subject must be retrieved from the Company's various departments

The information to be provided may be found in:

- letters;
- emails;
- documents;
- meeting minutes;
- memos and file notes;
- invoices;
- health records.

- b. Identify, with the IT Manager and the support of the Cyber Security Team, secure ways to send data (e.g., encrypted data with a separate key or other measures appropriate to the risk and data category).
- c. Review the information provided in the privacy policy and select the information relevant to the Data Subject (e.g., select recipients).
- d. Send the response to the Data Subject.

- Data inferred from other data not directly provided by the Data Subject;
- Pseudonymized data.

When providing the above information and a copy of the data, the following criteria must be observed:

- If the request is submitted in electronic format, the above information must also be provided in electronic format;
- The data provided must be complete and understandable: instructions on how to read the data should be provided (e.g., a legend of acronyms and symbols);

If the Data Subject requests additional copies, the Controller may charge a reasonable fee based on administrative costs.

The Data Subject's right to obtain a copy must not adversely affect the rights and freedoms of others. If a large amount of data has been processed, the DPO may ask the Data Subject to specify the information or processing activities to which the Request relates.

Right of rectification

Data Subject has the right to obtain the rectification of inaccurate personal data without undue delay. Taking into account the purposes, Data Subject has the right to have incomplete personal data completed, including by means of a supplementary statement.

Required Actions

- The **General Counsel** contacts the **IT Manager** to correct the information on all Company records.
- Communicate the correction to the Data Subjects to whom the data was disclosed (including the Data Processors) to ensure that the information is updated accordingly and inform the Data Subject of these recipients, if requested
- Inform the Data Subject

Right to cancellation

The Data Subjects have the right to request the cancellation of their personal data when:

- the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- the Data Subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the Data Subject objects to the processing (see below) and there are no overriding legitimate grounds for the processing, or the Data Subject objects to marketing processing (see below);
- personal data has been unlawfully processed;
- personal data must be cancelled for compliance with a legal obligation under European Union or Member State law.

The right to cancellation does not apply to the extent that processing is necessary for:

- exercising the right to freedom of expression and information;
- compliance with a legal obligation which requires processing under European Union or Member State law;
- the establishment, exercise or defense of a right in court.

Required Actions

- a. The **General Counsel** contacts the **IT Manager** to implement appropriate technical measures;
- b. Communicate the deletion to the Data Subjects to whom the data was disclosed (including the Data Processors) to ensure that the information is updated accordingly;
- c. Inform the Data Subject;
- d. Inform the Data Subject of these recipients, upon request.

Right to restriction of processing

Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:

- the Data Subject contests the accuracy of personal data, for a period enabling the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the cancellation of the personal data and requests the restriction of their use instead;
- the personal data are no longer necessary for the purposes of the processing, but are required by the Data Subject for the establishment, exercise, or defense of legal claims;
- the Data Subject has objected to the processing (see below), pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.

Required Actions

- a. The **General Counsel** contacts the **IT Manager** to implement technical measures to limit the processing of personal data.
- b. The **IT Manager**, if applicable after consulting the **ICT Director** and the **DPO**, must implement appropriate measures to ensure that personal data can only be processed:
 - with the Data Subject's consent; or
 - for the establishment, exercise, or defense of legal claims; or
 - to protect the rights of another physical or legal person; or
 - for reasons of substantial public interest at the European Union or national level.
- c. Contact the DPO to verify whether any of the measures referred to in points (a) to (d) of the previous point apply.
- d. Inform the Data Subject.

Right to data portability

Data Subject has the right to receive its personal data in a structured, commonly used, and machine-readable format and has the right to transmit such personal data to another organization, where technically feasible, in the following cases:

- the processing is based on consent or a contract; and
- the processing is carried out by automated means.

In any case, the exercise of this right must not adversely affect the rights and freedoms of others (for example, the communication of personal data to other companies involves the processing of third-party data without an appropriate legal basis).

Right of opposition

Data Subject has the right to oppose, at any time:

- for reasons relating to his or her particular situation, to processing of his or her personal data based on public interest or legitimate interest, including profiling; or
- to processing of his or her personal data for direct marketing purposes, including related profiling. In this case, the personal data will no longer be processed for such purposes;
- to processing for scientific or historical research purposes or statistical purposes, unless necessary for the performance of a task carried out in the public interest.

Required Actions

- The **General Counsel**, if necessary consulting the **DPO**, must verify the legal basis for the request in the data processing records and/or privacy policy, is contract or consent;
- Contact the **IT Manager** to assess the technical feasibility of transmitting personal data to another organization.
- The transmission of personal data does not necessarily result in the deletion of such personal data from the Company's systems: if the Data Subject wishes for their deletion, this must be specified in the Request.
- Inform the Data Subject.

Required Actions

- Il **General Counsel** contatta l'**IT Manager** per implementare misure tecniche che consentano l'esercizio del diritto di opposizione.
- Nei casi in cui il diritto di opposizione non sia esercitato con riguardo al marketing diretto, il **General Counsel** contatta il **DPO** per verificare la presenza di motivi

In any of the aforementioned circumstances, the Data Controller shall no longer process the personal data, unless it demonstrates compelling legitimate grounds for the processing that override the interests or fundamental rights and freedoms of the Data Subject, or for the establishment, exercise, or defense of legal claims.

Right not to be subject to a decision based solely on automated processing

This right applies only when the decision:

- produces legal effects concerning the Data Subject; or
- similarly significantly affects the Data Subject (for example, marketing activities directed at vulnerable groups of Data Subjects).

Such processing is considered lawful where the decision:

- is based on the necessity of entering into or performing a contract between the Data Subject and the Data Controller;
- is based on the Data Subject's explicit consent (note that with regard to the processing of employees' personal data, consent is not a valid legal basis);
- is authorized by European Union or national law.

legittimi per il trattamento.

- c. Informare l'Interessato.

Required Actions

The **General Counsel** consults the **DPO** and the relevant **Business Unit** to assess whether these rights are applicable.

5. Restrictions on Data Subject Requests under Italian law

Restrictions may also be applied based on specific national laws. When the **General Counsel** believes that the exercise of a Data Subject's rights may be adversely affected by one of the following circumstances, he or she must consult with the **DPO** to allow for an assessment of such circumstances.

In Italy, restrictions on the exercise of Data Subject rights may arise, depending on the case, in relation to, for example, the following:

- legislation on money laundering and extortion;
- activities carried out by a public entity pursuant to a specific provision for purposes related to monetary and currency regulation, payment systems, intermediary control, credit and financial markets and their stability;
- conducting defensive investigations and exercising rights in court;
- confidentiality obligations relating to employee reports in the context of the adoption of whistleblowing systems.

Required Actions

In such cases, the **General Counsel**, together with the **DPO**, will conduct a balancing exercise and assess whether the **Data Subject's** right should be restricted, providing the Data Subject with a specific communication containing the reasons and information on the right to lodge a complaint with the competent authority.

ANNEX A – Request Form

The Company asks the Data Subject to complete this form if he/she wishes to exercise any of their rights under the GDPR.

1. Please provide the following personal data:

Name _____

Address _____

Phone number _____

Email address _____

2. Which right under the GDPR in relation to your personal data do you wish to exercise?

3. Please describe your relationship with the Company
(for example, whether you are an employee or a customer, and indicate whether this relationship is current or past)

4. Regarding the subject of your Request, in some cases the Company may require verification of the Data Subject's identity in order to properly identify him or her. For example, the Company may request your identity card or any other documentation that allows it to reliably identify you, such as:

- customer or supplier identification number (or another identifier);
- a copy of your driving license.

5. If you wish to access your personal data held by the Company, please answer the following questions in as much detail as possible to allow us to identify the personal data subject to your Request. Please note that the broader the scope of your request, the longer it will take for us to provide you with the personal data:
 - Do you wish to exercise this right to specific categories of personal data?
 - Are you interested in receiving specific information on the processing of personal data?
 - From what date is the Company required to search for your personal data?
6. If you intend to exercise the right to object, restriction, or cancellation, please provide specific information about your request and the reasons therefore so we can process it.

7. If you intend to exercise the right to rectification, please provide details of any errors in the personal data we hold or any data that is no longer up to date.
8. If you wish to exercise your right to data portability with respect to a third party, please provide the details below of any organization to which you would like your personal data transferred.

Organization _____

Address _____

Phone number _____

Email address _____

ANNEX B

Data Subject Requests Register Template

Company	Right	Requester	Status	Date of receipt	Completion Date