

## Policy for the Exercise of Rights of Data Subjects

Regulation (EU) 2016/679 (so-called GDPR) recognizes in favor of individuals a number of rights related to the processing of their personal data and provides specific means of protection, to be operated in certain ways. Through this policy statement, it is possible to know what rights can be exercised by data subjects. In addition, the Data Controller ROBERT HOLLMANN FOUNDATION explains the modalities of the internal procedure for responding to the exercise of such rights.

Under certain conditions, and subject to the limitations set forth in Article 23 of the GDPR, the data subject has the right to:

- **right of access (Art. 15 GDPR):** allows to request confirmation that a processing is taking place of personal data and allows to receive a copy of the data being processed;
- **right to rectification (Art. 16 GDPR):** to request amendment or supplementation of the data provided;
- **right to erasure (Art. 17 GDPR):** to request the deletion of personal data;
- **right to restriction of processing (art. 18 GDPR):** to request that data be marked so as to limit their processing in the future;
- **right to data portability (Art. 20 GDPR):** to request that the data provided be transmitted, without hindered, to the data subject or to another named data controller, using a format that is 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 overriding reasons for processing.

### Modalities for the exercise of rights by data subjects

Data Subjects may exercise their rights through the following communication channels:

The Data Subject may submit a request to the Data Controller, without special formalities, by sending a simple communication by e-mail or registered letter, with the sole care to indicate in the subject line that it is “Exercise of GDPR rights”.

The petition may refer, depending on the needs of the Data Subject, to specific personal data, categories of data or to a particular processing, or to all personal data concerning him/her, however processed.

Requests may also be submitted by the Interested Parties through a third party with an appropriate proxy duly signed.

If the Data Controller has reasonable doubts about the identity of the individual submitting the request to exercise his/her rights, he/she may request additional information necessary to confirm the identity of the data subject (including a copy of a valid identity document).

Identity shall be considered certain or, in any event, proven if the Data Subject has produced a copy of his/her own valid identity or if he or she has indicated in the request a sufficient amount of information that can be reasonably assumed to be exclusively available to the Interested Party (e.g., e-mail from an address e-mail that coincides with the one indicated by the Data Subject elsewhere in dealings with the Company)

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[www.fondazionerobertollman.it](http://www.fondazionerobertollman.it)

**Sede di Padova**

Via Siena, 1 - 35143 Padova (PD)  
 Tel: +39 049 680629

Email: [padova@fondazionerobertollman.it](mailto:padova@fondazionerobertollman.it)

**Sede di Cannero Riviera**

Via Oddone Clerici, 6 - 28821 Cannero Riviera (VCO)  
 Tel: +39 0323 788485

Email: [cannero@fondazionerobertollman.it](mailto:cannero@fondazionerobertollman.it)

## MANAGEMENT OF APPLICATIONS

### Subjects in charge of receiving requests

The individuals appointed to receive requests from data subjects and to manage them will be the individuals expressly designated and authorized by the Data Controller to handle the request, with possible involvement of the DPO.

### Operational Procedure

The handling of requests for the exercise of data subjects' rights involves the following steps:

#### (a) Receipt of the request from the data subject.

In case of receipt of a request, the officers receiving the request will closely involve the contact person internal privacy officer who will assign the evaluation of the instance to the authorized persons of the processing of the relevant area.

#### (b) Evaluation and processing of the request

The data controller, with possible consultation with the DPO, will carry out the assessment of the merits or otherwise of the request, implementing all necessary actions to meet the request.

The Data Controller may refuse the request:

- if it demonstrates 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 interval of time has not elapsed between similar requests, after assessing, in accordance with EDPB guidelines: (i) the periodicity with which the Data Subject's personal data 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.

If the request is unfounded, the Data Controller will inform the requester, no later than one month after receipt of the request, of the rejection and the reasons for the rejection, as well as of the possibility of lodging a complaint with a supervisory authority and filing a judicial appeal.

If, on the contrary, the request is legitimate, the necessary operations will be carried out to acknowledge the request, as provided for in Articles 15 to 22 of the GDPR (e.g., rectification, integration, deletion, etc.).

#### (c) Responding to the data subject.

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

**This deadline may be extended by two months**, if necessary, due to the complexity and number of the requests made by the Data Subject, if necessary to obtain further clarification in order to identify the Data Subject or to request the support of the DPO in evaluating the request. In this case, the Data Controller will inform the Data Subject about the need for extension and the reasons placed basis for the same.

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Email: [padova@fondazionerobertollman.it](mailto:padova@fondazionerobertollman.it)

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Email: [cannero@fondazionerobertollman.it](mailto:cannero@fondazionerobertollman.it)

Acknowledgement will be given to the Data Subject using the same communication channel through which he or she made the request (e.g., e-mail), unless otherwise indicated by the Interested Party itself as expressed in the request or otherwise inferable.

The response will be made in a concise, clear, transparent and intelligible form.

#### **6. Record of requests to exercise the rights of interested parties**

The documentation relating to the requests submitted by the Interested Parties will be kept in a special Register.

#### **7. Costs for the management of the petitions**

The processing of requests will be carried out without charging any costs to the interested party. However, if the requests are manifestly unfounded or excessive, the data controller may charge a reasonable fee.

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