

PROCEDURE RIGHTS OF THE DATA SUBJECT

PURSUANT TO ARTICLES 15 TO 23 OF REGULATION (EU) 2016/679

Regulation (EU) 2016/679 on the protection of personal data counts, among its cornerstones, the protection of the rights of the data subject in the processing of personal data.

These rights give the data subject control over the types of data used and over the processing methods, and the ability to restrict that use, to object to it and, in certain circumstances, to have the personal data erased.

A corollary of these rights is the right to lodge a complaint and to judicial protection in the event of breaches involving unauthorised or unlawful processing.

This procedure first identifies those rights and then sets out the response times and the ways in which they can be exercised. Finally, this document identifies the person responsible for responding to requesters.

The purpose of this procedure is to facilitate the exercise of the data subject's rights, pursuant to Article 12, paragraph 2.

THE RIGHTS OF THE DATA SUBJECT

Article 15

Right of access by the data subject

1. The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22, paragraphs 1 and 4, and, at least in those cases, meaningful information about the

logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject has the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller provides a copy of the personal data undergoing processing.

For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information is provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 must not adversely affect the rights and freedoms of others.

Rectification and erasure

Article 16

Right to rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Article 17

Right to erasure ('right to be forgotten')

1. The data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller has the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21, paragraph 1, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21, paragraph 2;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1.

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase them, the controller, taking account of available technology and the cost of implementation, takes reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 do not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with Article 9, paragraph 2, letters h) and i), as well as Article 9, paragraph 3;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89, paragraph 1, in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

Article 18

Right to restriction of processing

1. The data subject has the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pursuant to Article 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data are, with the exception of storage, only processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 is informed by the controller before the restriction of processing is lifted.

Article 19

Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller communicates any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17, paragraph 1, and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller informs the data subject about those recipients if the data subject requests it.

Article 20

Right to data portability

1. The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent pursuant to Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), or on a contract pursuant to Article 6, paragraph 1, letter b); and
- b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right referred to in paragraph 1 of this Article is without prejudice to Article 17. That right does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 must not adversely affect the rights and freedoms of others.

Right to object and automated individual decision-making

Article 21

Right to object

1. The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on Article 6, paragraph 1, letter e) or f), including profiling based on those provisions.

The controller no longer processes the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data are no longer processed for such purposes.

4. The right referred to in paragraphs 1 and 2 is explicitly brought to the attention of the data subject and presented clearly and separately from any other information, at the latest at the time of the first communication with the data subject.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89, paragraph 1, the data subject, on grounds relating to his or her particular situation, has the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Article 22

Automated individual decision-making, including profiling

1. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

2. Paragraph 1 does not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

3. In the cases referred to in paragraph 2, letters a) and c), the controller implements suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

4. Decisions referred to in paragraph 2 are not based on special categories of personal data referred to in Article 9, paragraph 1, unless Article 9, paragraph 2, letter a) or g) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

Restrictions

Article 23

Restrictions

1. Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12

to 22 and Article 34, as well as Article 5 in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22, when such a restriction respects the essence of the fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard:

- a) national security;
- b) defence;
- c) public security;
- d) the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- e) other important objectives of general public interest of the Union or of a Member State, in particular an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;
- f) the protection of judicial independence and judicial proceedings;
- g) the prevention, investigation, detection and prosecution of breaches of ethics for regulated professions;
- h) a monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in letters a) to e) and g);
- i) the protection of the data subject or the rights and freedoms of others;
- j) the enforcement of civil law claims.

2. In particular, any legislative measure referred to in paragraph 1 contains specific provisions at least, where relevant, as to:

- a) the purposes of the processing or categories of processing;
- b) the categories of personal data;
- c) the scope of the restrictions introduced;
- d) the safeguards to prevent abuse or unlawful access or transfer;
- e) the specification of the controller or categories of controllers;
- f) the storage periods and the applicable safeguards taking into account the nature, scope and purposes of the processing or categories of processing;
- g) the risks to the rights and freedoms of data subjects; and
- h) the right of data subjects to be informed about the restriction, unless that may be prejudicial to the purpose of the restriction.

Judicial protection

Chapter VIII of Regulation (EU) 2016/679 provides for the remedies available to protect the data subject.



In particular, Article 77 (Right to lodge a complaint with a supervisory authority), Article 78 (Right to an effective judicial remedy against a supervisory authority) and Article 79 (Right to an effective judicial remedy against a controller or processor).

HOW TO EXERCISE THE RIGHTS AND HOW WE RESPOND

The data subject's rights may be exercised by e-mail, PEC (certified e-mail) or registered letter with acknowledgement of receipt.

To make it easier to exercise these rights, the data subject may download the request form from the Downloads area of the website www.lanartex.it.

To exercise these rights, the data subject may write to the e-mail address privacy@lanartex.it or to the PEC address lanartex@pec.it.

The person responsible for replying to requests is the Data Controller, Lanartex S.r.l. (e-mail privacy@lanartex.it, PEC lanartex@pec.it).

The controller, directly or through a person authorised to process personal data, provides the data subject with information on the request submitted without undue delay and in any case within one month of receipt of the request.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller informs the data subject of any such extension, together with the reasons for the delay, within one month of receipt of the request. Where the data subject makes the request by electronic means, the information is provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the data subject's request, the controller informs the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The information provided to the data subject and any communications and actions taken are free of charge.

Where requests from the data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:

- a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- b) refuse to act on the request.

The controller bears the burden of demonstrating the manifestly unfounded or excessive character of the request.



Where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

Montemurlo, 1 October 2026

The Data Controller – Lanartex S.r.l.