

 COMPUTER NUMERICAL CONTROL	PRIVACY_02	PROCEDURE FOR THE EXERCISE OF DATA SUBJECTS RIGHTS		PUBLIC DOCUMENT
	Prepared by	Privacy Manager	Version	1.0
			Date	31/03/2025
	Approved by	Managing Director	Pages	1 di 13

PROCEDURE FOR THE EXERCISE OF DATA SUBJECTS RIGHTS

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1 PURPOSE

The Company's activities allow for the identification of the data subject through the collection of one or more personal data of either common or special categories, via various processing operations. These operations must be conducted respecting the fundamental rights and freedoms outlined by Regulation (EU) 2016/679 (GDPR).

Supranational legislation grants data subjects numerous rights.

This procedure is intended to facilitate and implement the exercise of the rights granted to data subjects concerning their personal data, clearly distinct from the right of access to administrative documents. A case-by-case balance of the various protected interests is essential. The data subject is required to provide all necessary details regarding the access request to allow the Data Controller to appropriately assess the request.

2 DATA SUBJECT RIGHTS

The full list of rights provided by the regulation includes: the right of access, the right to erasure, the right to rectification, the right to restriction, the right to data portability, and the right to object.


However, these rights cannot be guaranteed to any individual at any time.

The rights that can effectively be exercised regarding the processing carried out by the Company are:

- The right of access (Art. 15 of Regulation (EU) 2016/679)
- The right to rectification in applicable cases (Art. 16)
- The right to erasure in applicable cases (Art. 17)
- The right to restriction in applicable cases (Art. 18)
- The right to data portability in applicable cases (Art. 20)
- The right to object in applicable cases (Art. 21)

3 EXERCISING THE RIGHT OF ACCESS

Pursuant to Art. 15 of the Regulation, the data subject has the right to obtain from the Controller confirmation as to whether or not personal data concerning them are being processed, and if so, access to the following information: the purposes of the processing, the categories of data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, especially if recipients in third countries or international organizations, the envisaged storage period or, if not possible, the criteria used to determine it, the existence of the right to rectification, erasure, restriction, and objection, the right to lodge a complaint with a supervisory authority, information about the source of the data, the existence of automated decision-making including profiling referred to in Article 22(1) and (4), and at least in such cases, meaningful information about the logic involved as well as the significance and envisaged consequences of such processing. Moreover, if personal data are transferred to a third country or an international organization, the safeguards referred to in Article 46 may be requested.

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The Controller provides a copy of the personal data, anonymizing any information that may identify other individuals, and may charge a reasonable fee based on administrative costs for additional copies.

Access may be denied if the request could compromise investigations, inquiries, official or judicial proceedings, the detection, prosecution of crimes, or the enforcement of criminal sanctions, if the request is unfounded or repetitive, concerns data already held or inaccessible, or if the data subject cannot be identified.

Any denial or limitation of access will be explained and communicated to the requester, in accordance with Article 12(3) of the Regulation. Conversely, if the request is deemed valid, the Controller shall inform the requester in writing of the personal data in its possession.

4 EXERCISING THE RIGHT TO RECTIFICATION

Pursuant to Art. 16 of the Regulation, the data subject has the right to obtain from the Controller the rectification of inaccurate personal data concerning them without undue delay.


5 EXERCISING THE RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

Article 17 of Regulation 2016/679 provides that the right to erasure may be exercised when the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if there is no other legal basis for the processing or no overriding legitimate grounds to continue the processing, in the cases referred to in Article 21(2), or if the personal data have been unlawfully processed, if they must be erased in order to comply with a legal obligation under Union law or the law of the Member State to which the Controller is subject, or if they were collected in relation to the offer of information society services referred to in Article 8(1).

This, provided that such data are not necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation which requires processing as provided for by Union or Member State law to which the Controller is subject, for the performance of a task carried out in the public interest, for the exercise of official authority vested in the Controller, for reasons of public interest, or for the establishment and/or exercise or defence of legal claims.

The right to erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information
- for compliance with a legal obligation to which the Controller is subject
- for reasons of public interest in the area of public health
- for archiving purposes in the public interest, scientific or historical research purposes
- for the establishment, exercise or defence of legal claims

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Upon receipt of the request, if deemed compliant, the Controller proceeds with the erasure and provides written notice to the requester. Otherwise, if the erasure of the data cannot be carried out, the requester shall be notified of the refusal and the reasons supporting it.

In the event that a request for erasure concerns data that must be retained under other applicable legal provisions, the Controller may decide not to proceed with the erasure and shall in any case inform the requester.

6 EXERCISING THE RIGHT TO RESTRICTION

Pursuant to Article 18 of Regulation (EU) 2016/679, the data subject has the right to obtain the restriction of the processing of personal data concerning them when:

1. they contest the accuracy of the personal data (within the limits of the storage duration);
2. the processing is unlawful;
3. the data subject needs the data for the establishment, exercise or defence of legal claims, although the Controller no longer needs the data for the purposes of the processing;
4. finally, when the data subject has objected to the processing of their data.

If the conditions for exercising the right to restriction are met, the data subject must submit a request for the exercise of their rights to the Data Protection Officer of the Entity, pursuant to Article 38(4) of the GDPR (the contact details of the DPO are available on the institutional website in the "Privacy" section) or directly to the Controller.

7 EXERCISING THE RIGHT TO DATA PORTABILITY

In cases where the legal basis for the processing is Article 6(1)(e), it is not possible for the data subject to exercise the right to data portability pursuant to Article 20 of Regulation (EU) 2016/679, as the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and is therefore excluded from the scope of this right under paragraph 3 of the same Article 20. In all other cases, the exercise of the right shall be assessed on a case-by-case basis.


The right to data portability may be exercised exclusively when the processing is based on the data subject's consent (Article 6(1)(a) or Article 9(2)(a)) or on a contract (Article 6(1)(b)) and is carried out by automated means.

8 EXERCISING THE RIGHT TO OBJECT

Pursuant to Art. 21, the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them under Article 6(1)(e), including profiling based on those provisions.

The Controller must refrain from further processing unless it demonstrates compelling legitimate grounds that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

If the conditions for exercising this right are met, the data subject must submit the request to the Company's Data Protection Officer under Article 38(4) GDPR (contact details on the website in the "Privacy" section) or directly to the Controller.

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9 PROCEDURE FOR THE EXERCISE OF RIGHTS

The Controller ensures the exercise of the following rights:

- access to personal data held by the Controller;
- objection to data processing;
- request for a copy of the data;
- request for erasure of the data;
- restriction of unlawfully processed data;
- rectification of inaccurate data.

The response to an access request may include data relating to third parties only when data separation or redaction would render the data incomprehensible and where no rights and freedoms of others are infringed.

Data subjects may submit their requests by completing the form (Annex A) made available on the website and sending it via email to the address indicated in the form.


The Controller provides the requested information without undue delay and in any case within one month from receipt. If necessary, this deadline may be extended by two months when the request was submitted without the provided form or due to complexity or volume. The Controller shall inform the data subject of such extension and the reasons within one month.

If the Controller cannot identify the personal data or is not certain that the data belong to the requester, they will be asked to provide additional information. In such cases, the response period starts upon receipt of this additional information.

The data subject may lodge a complaint with the appointed Data Protection Officer and/or with the Supervisory Authority for the protection of personal data.

SUMMARY TABLE - RIGHTS THAT CAN BE EFFECTIVELY EXERCISED

Right	GDPR Article	Exercisability	Note
Right of access	Art. 15	Exercisable	Always exercisable, subject to the limitations set out in Article 15 and Article 12(5) GDPR
Right to data portability	Art. 20	Exercisable	Only if the processing is based on consent or a contract and is carried out by automated means*
Right to rectification	Art. 16	Exercisable	Always exercisable
Right to erasure (right to be forgotten)	Art. 17	Exercisable	Unless there are legal obligations or reasons of public interest

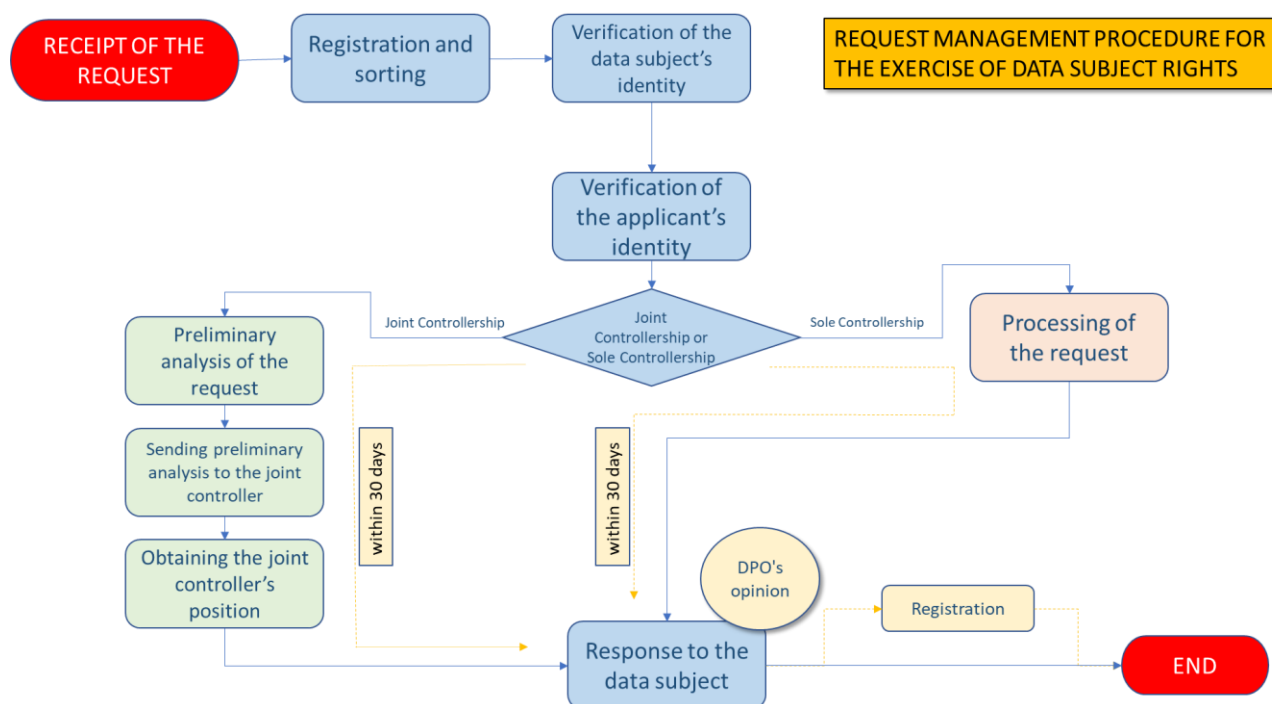
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Right to restriction of processing	Art. 18	Exercisable	Only when the conditions referred to in Article 18 GDPR are met
Right to object	Art. 21	Exercisable	Only for processing based on Article 6(1)(e) or (f), unless there are overriding legitimate grounds

* Not exercisable in cases where the purpose of the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

10 Phases of the Request Management Process for the Exercise of Rights

The workflow for handling a request to exercise rights is represented below:



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ANNEX A


FORM FOR THE EXERCISE OF RIGHTS REGARDING PERSONAL DATA

This form is valid as a self-declaration pursuant to Presidential Decree no. 445/2000 regarding the data and facts reported herein. Anyone who makes false statements or provides false documents shall be subject to the penalties provided for in Article 76 of Presidential Decree 445/2000.

To the attention of					
I, the undersigned:					
Born in:				on (date)	
Resident in		at (address)			
Identified by		Issued by		on (date)	

Note: THE REQUEST MUST BE SENT TO THE FOLLOWING CERTIFIED EMAIL (PEC) ADDRESS: osaicncsrl@pec.osaicncsrl.it or to the mailbox: privacy@osaicnc.com.

as an INTERESTED PARTY, I am requesting: (tick only the boxes that apply to you)
<p>ACCESS TO PERSONAL DATA</p> <p>Pursuant to Article 15 of Regulation (EU) 2016/679</p> <p><input type="checkbox"/> I request confirmation as to whether or not personal data concerning me are being processed;</p> <p><input type="checkbox"/> If so, I request access to said data, a copy thereof, and all information referred to in points a) to h) of Article 15(1) of the Regulation, including in particular:</p> <ul style="list-style-type: none"> - the purposes of the processing; - the categories of personal data concerned; - the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients in third countries or international organisations; - the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; - the origin of the data (i.e., the individual or specific source from which they were obtained); - the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

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- ☐ It is understood that the Data Controller may provide a copy of the personal data only by anonymising any data that may identify other individuals. In the event that multiple copies are requested, the Controller may charge a fee based on administrative costs.

PERSONAL DATA PORTABILITY

Pursuant to Article 20 of Regulation (EU) 2016/679. This request concerns

- ☐ the receipt of personal data concerning the data subject in a structured, commonly used and machine-readable format;
- ☐ the direct transmission to another data controller, if technically feasible.

The right to data portability can be exercised only when

- the processing is based on consent (Art. 6(1)(a) or Art. 9(2)(a));
- or on a contract (Art. 6(1)(b))
- and is carried out by automated means.

Specify which processing the request refers to:

If applicable, specify the destination of the data (another controller):


Company name/Name of the other controller:

PEC or email address of the recipient:

Additional notes (optional):

RECTIFICATION OF DATA

Pursuant to Article 16 of Regulation (EU) 2016/679

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☐ This request concerns the rectification and/or updating of data under Article 16 of Regulation (EU) 2016/679, for the following reasons (please specify):

a)

b)

c)

d)

e)

ERASURE OF PERSONAL DATA

Pursuant to Article 17 of Regulation (EU) 2016/679

☐ This request concerns the erasure of data under Article 17(1) of Regulation (EU) 2016/679, for the following reasons (please specify):

a)

b)

c)

d)

In the cases provided for in Article 17(2) of the Regulation, I also request confirmation that the Controller has informed other controllers of the data subject's erasure request


RESTRICTION OF PROCESSING

Pursuant to Article 18 of Regulation (EU) 2016/679

☐ This request concerns the restriction of processing under Article 18, for the following reasons (check all that apply):

☐ I contest the accuracy of the personal data;

☐ The processing is unlawful;

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☐ he data are required for the establishment, exercise or defence of a legal claim;


☐ I have objected to processing under Article 21(1) of the Regulation.

This request refers to the following personal data, data categories, or processing operations:

OBJECTION TO PROCESSING

Pursuant to Article 21 of Regulation (EU) 2016/679


☐ I object to the processing of my personal data under Article 6(1)(e) or (f), for the following reasons related to my particular situation (please specify);

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ADDITIONAL COMMENTS			
<p>I declare the following (use this space for any relevant clarifications or to list attached documents):</p> <div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <div style="border-bottom: 1px solid black; height: 20px;"></div>			
I request that the response be sent to me			
<input type="checkbox"/> in electronic format to the email/PEC address			
<input type="checkbox"/> in paper format to my home address			
to another address		Street:	
A copy of my identity document is attached.			
Place and date		Firma	

INFORMATION ON PERSONAL DATA PROCESSING

For information on the processing of personal data by OSAlcnc srl following receipt of this form, please note that OSAlcnc srl, as Data Controller (Ivrea via Jervis 11 (TO), Tel (+39) 0125 1906267, Email privacy@osaicnc.com), will process the personal data provided through this form mainly by electronic and digital means, for the purposes established by Regulation (EU) 2016/679 and the Italian Data Protection Code (Legislative Decree no. 196/2003, as amended), specifically to comply with a legal obligation. Providing data is mandatory and failure to do so prevents the assessment of the submitted documentation. Data collected in this procedure will be stored according to rules on administrative documentation retention. The data will be processed exclusively by the Controller's staff and by companies expressly appointed as data processors. Outside of these cases, the data will not be disclosed or shared, unless required by law or necessary to be communicated to other parties involved in the processing. Data subjects have the right to access their data, request rectification or erasure, restrict processing, or object to processing (Articles 15 et seq. of the Regulation). Requests can be sent via PEC to osaicncsrl@pec.osaicncsrl.it or by contacting the Data Protection Officer: privacy@osaicnc.com.

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VERSIONS / REVISIONS

Date	Version	Description	Ref
31/03/2025	1.0	First release	Ref. Privacy