


	GDI-00	Pag. 1/7	
	Procedure for requesting data access by the interested party		Rev. 0 30/09/2018

Summary

1. APPLICATION, PURPOSE AND ADDRESSEES	2
2. REFERENCE DOCUMENTS	2
3. REQUEST FOR DATA ACCESS BY THE INTERESTED PARTY	2
4. RIGHTS OF THE INTERESTED PARTIES	3
5. REQUIREMENTS FOR A REQUEST FOR DATA ACCESS	3
6. PROCESS OF REQUEST FOR DATA ACCESS	4
6.2 REQUEST	4
6.3 VERIFICATION OF IDENTITY.....	4
6.4 INFORMATION FOR THE REQUEST FOR DATA ACCESS FROM AN INTERESTED PARTY	4
6.5 INFORMATION REVIEW	4
6.6 ANSWER TO THE REQUEST FOR ACCESS	4
6.7 FILING.....	5
7. EXCEPTIONS	5
8. REFUSED REQUESTS FOR DATA ACCESS.....	5
9. LIABILITY	6
10. MANAGEMENT OF RECORDINGS ON THE BASIS OF THIS DOCUMENT.....	6
11. VALIDITY AND MANAGEMENT OF THE DOCUMENT	6
12. ATTACHMENTS	6

Index of Figures

Figure 1-Flow chart of the Data Access Request by the interested party.....	7
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	GDI-00	Pag. 2/7	
	Procedure for requesting data access by the interested party	Rev. 0	30/09/2018

1. APPLICATION, PURPOSE AND ADDRESSEES

This procedure defines the key characteristics for managing or responding to requests for access to personal data-by-data subjects, their representatives or other interested parties. This procedure will allow the Alma Mater Foundation (from now on: "FAM") to fulfil legal obligations, provide better customer service, improve transparency, allow people to verify that information about them is accurate and increase the level of trust, being open to people about the information that is stored on them.

This procedure generally applies to all affiliated entities or companies owned or managed by the Company, but does not affect any state or local law or regulation that might otherwise be applicable.

This procedure applies to employees who handle requests for data access such as the Data Protection Officer and the Head of the Administration, Budget and Contracts Area.

2. REFERENCE DOCUMENTS

- The 2016/679 EU GDPR (Regulation (EU) 2016/679 of the European Parliament and of the European Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, as well as on the free movement of such data and repealing Directive 95/46 / EC)
- The Policy on Protection of Personal Data

3. REQUEST FOR DATA ACCESS BY THE INTERESTED PARTY

The Data Access Request by the Data Subject is a request formulated by an individual or a person's legal representative for information held by the Company regarding that person. The Data Access Request by the Data Subject entitles interested parties to view or view their personal data and request copies of the data.

A request for data access by the interested party must be submitted in writing. In general, verbal requests for information relating to an individual are not Requests for Data Access by the valid data subject. In the event that a formal request for data access by the interested party to access personal data is made verbally to a member of the staff of FAM, it is necessary to request further information from the Data Protection Officer and / or the person in charge of Area Administration, Budget and Contracts, which will examine and approve all requests for data access.

A Data Access Request by the Data Subject may be made by one of the following methods: email, fax, mail, company website or any other method. Requests sent online must be treated like any other request for access to personal data at the time of receipt, although the Company does not provide personal information through social media channels.

	GDI-00	Pag. 3/7	
	Procedure for requesting data access by the interested party		Rev. 0 30/09/2018

4. RIGHTS OF THE INTERESTED PARTIES

Access rights by data subjects include the following:

- Know if a data controller holds personal data about them.
- Receive a description of the data held on them and, if permitted and practical, a copy of the data.
- Be informed about the purpose (s) for which data is processed and where these data were received.
- Be informed if the information is disclosed to anyone, apart from the original recipient of the data; and if so, the identity of these recipients.
- The right to data portability. Interested parties may request that their personal data be transferred to them or to third parties in readable form by devices (Word, PDF, etc.). However, such requests can only be satisfied if the data in question are: 1) provided by the person concerned to the Company, 2) are processed by automated means and 3) are processed on the basis of consent or fulfillment of a contract.
- The existence of an automated decision-making process for which the data are used, to know what is the logic used by the system to make such decisions and to be able to request human intervention.

FAM must provide an answer to those who request access to their data within 30 calendar days of receipt of the Data Access Request by the Data Subject, unless the local legislation imposes otherwise.

5. REQUIREMENTS FOR A REQUEST FOR DATA ACCESS

In order to respond promptly to requests for data access, the data subject should:

- Send your request using a data access request form GDI-05 Form for **requesting data access by the interested party**
- Provide sufficient information to the FAM to validate your identity (to ensure that the person requesting the information is the person concerned or a person authorized by him).

Subject to the exceptions set out in this document, the Company will provide information to interested parties whose requests are made in writing (or other methods expressly permitted by local law) and will be received by a person whose identity can be validated by the Company.

However, FAM will not provide data where the activities necessary to identify and retrieve it are overly difficult or take too long. Requests are more likely to succeed where they are specific and targeted to particular information.

Factors that can help narrow down the scope of a search include identifying the probable information holder (for example by referring to a specific department), the length of time the information was generated or treated (narrower it is the period of time, most likely that a request is successful) and be specific about the nature of the searched data (for example a copy of a particular form or an e-mail from a particular department).

	GDI-00	Pag. 4/7	
	Procedure for requesting data access by the interested party	Rev. 0	30/09/2018

6. PROCESS OF REQUEST FOR DATA ACCESS

6.2 REQUEST

Upon receipt of a Data Access Request by the interested party, the Head of the Administration, Budget and Contracts Area will confirm the request. The applicant may be invited to complete a Data Access Request Form to enable the company to identify relevant information.

6.3 VERIFICATION OF IDENTITY

The Head of the Administration, Budget and Contracts Area must verify the identity of anyone making a Data Access Request to ensure that the information is provided only to the person entitled to it. If the identity of an applicant has not already been provided, the person who receives the request will ask the applicant to provide two forms of identification, one of which must be a photo on an identification document and the other the confirmation of the address .

If the applicant is not the person concerned, written confirmation is required that the applicant is authorized to act on behalf of the data subject.

6.4 INFORMATION FOR THE REQUEST FOR DATA ACCESS FROM AN INTERESTED PARTY

Upon receipt of the required documents, the person receiving the request will provide the Data Protection Officer with all relevant information to support the request. Where the Data Protection Officer is reasonably satisfied with the information presented by the person who received the request, he will inform the applicant that his request will be answered within 30 calendar days. The 30-day period starts from the date of receipt of the requested documents. The Data Protection Manager will inform the applicant in writing if there is any deviation from the time of 30 days due to other intermediate events.

6.5 INFORMATION REVIEW

The Data Protection Officer will contact and request the competent service (s) the information required in accordance with the Data Access Request. This may also involve an initial meeting with the relevant department to evaluate the request, if necessary. The department that maintains the information must return the requested information within the time limit set by the Data Protection Officer and / or an additional meeting with the department is organized to review the information. The Data Protection Officer will determine if there is any information that could be subject to an exception and / or if the consent of third parties is required.

The Data Protection Officer must ensure that the information is reviewed / received within the prescribed time limit and that the 30-calendar period is respected. The Data Protection Officer will ask the competent department to complete a "Data Communication Form to the Data Subject" to document compliance with the 30-day requirement.

6.6 ANSWER TO THE REQUEST FOR ACCESS

The Data Protection Officer will provide the definitive answer together with the information retrieved from the department (s) and / or a statement stating that the Company does not hold the requested information or that an exception is applied. The Data Protection Officer will ensure that a written reply is sent to the

	GDI-00 Procedure for requesting data access by the interested party	Rev. 0	Pag. 5/7 30/09/2018

applicant. This will be done by e-mail, unless the applicant has specified another method by which he wishes to receive the reply (eg by post). The company will provide information only through secure channels. When paper copies of information are sent by post, they will be securely sealed and sent by registered mail.

6.7 FILING

After the response has been sent to the applicant, the Data Access Request by the Data Subject will be considered closed and archived by the Data Protection Officer.

The procedure is presented as a flowchart attached to this document.

7. EXCEPTIONS

An individual has no right to access information registered on someone else, unless he is an authorized representative or has parental responsibility.

FAM is not required to respond to requests for information unless sufficient details are provided to allow the location of the information to be identified and that it is not satisfied with the identity of the person making the request.

In principle, the FAM will not normally disclose the following types of information in response to a request for data access.

- Information about other people: a Data Access Request may relate to information relating to a person or persons other than the person concerned. Access to such data will not be granted, unless the persons involved do not allow the disclosure of their data.
- Repeated requests - If a similar or identical request in relation to the same interested party has been previously satisfied within a reasonable period of time, and where there is no significant change in the personal data held in relation to that individual, any further requests made within a period of six months from the original request will be considered a repeated request and the Company will not normally provide a further copy of the same data
- Publicly available information - The Company is not required to provide copies of documents that are already in the public domain.
- Opinions provided confidentially or protected by copyright law - The Company is not required to disclose personal data held in connection with a data subject in the form of an opinion expressed confidentially or protected by copyright law.
- Privileged documents - Any privileged information held by the Company must not be disclosed in response to a Data Access Request. In general, inside information includes any document that is confidential (for example, direct communication between a client and his lawyer) and was created for the purpose of obtaining or providing legal advice.

8. REFUSED REQUESTS FOR DATA ACCESS

There are situations in which people do not have the right to see information about them. For example:

Procedure for requesting data access by the interested party

Rev. 0

30/09/2018

- If the information is stored for statistical or research purposes only, and if the results of the statistical or research work are not made available in a form that identifies any of the persons involved.
- Requests made for other non-data protection purposes may be rejected.

If the responsible person rejects a Data Access Request on behalf of the Company, the grounds for refusal must be clearly stated in writing. Any individual dissatisfied with the outcome of their request for data access has the right to send a request to the Data Protection Officer to have the result reviewed.

9. LIABILITY

The general responsibility for ensuring compliance with a Data Access Request by the Data Subject is the responsibility of the Data Protection Officer.

If the Company acts as a data controller against the person making the request, the request will be managed according to the provisions of this procedure.

If the Company acts as a data processor, the Data Protection Officer will forward the request to the competent controller on behalf of whom the Company processes the personal data of the person making the request.

10. MANAGEMENT OF RECORDINGS ON THE BASIS OF THIS DOCUMENT

Nome del documento	Luogo di archiviazione	Persona responsabile dell'archiviazione	Controlli per la protezione del documento	Tempo di archiviazione
Form for the request of data access by the interested party	Shared server	The Data Protection Manager	Only authorized persons can have access to the folder	10 years
Data Communication Form to the Interested Party	Shared server	The Data Protection Manager	Only authorized persons can have access to the folder	10 years

11. VALIDITY AND MANAGEMENT OF THE DOCUMENT

This document is effective as of 09/30/2018.

The person responsible for this document is the Data Protection Officer, who must check and, if necessary, update the document at least once a year.

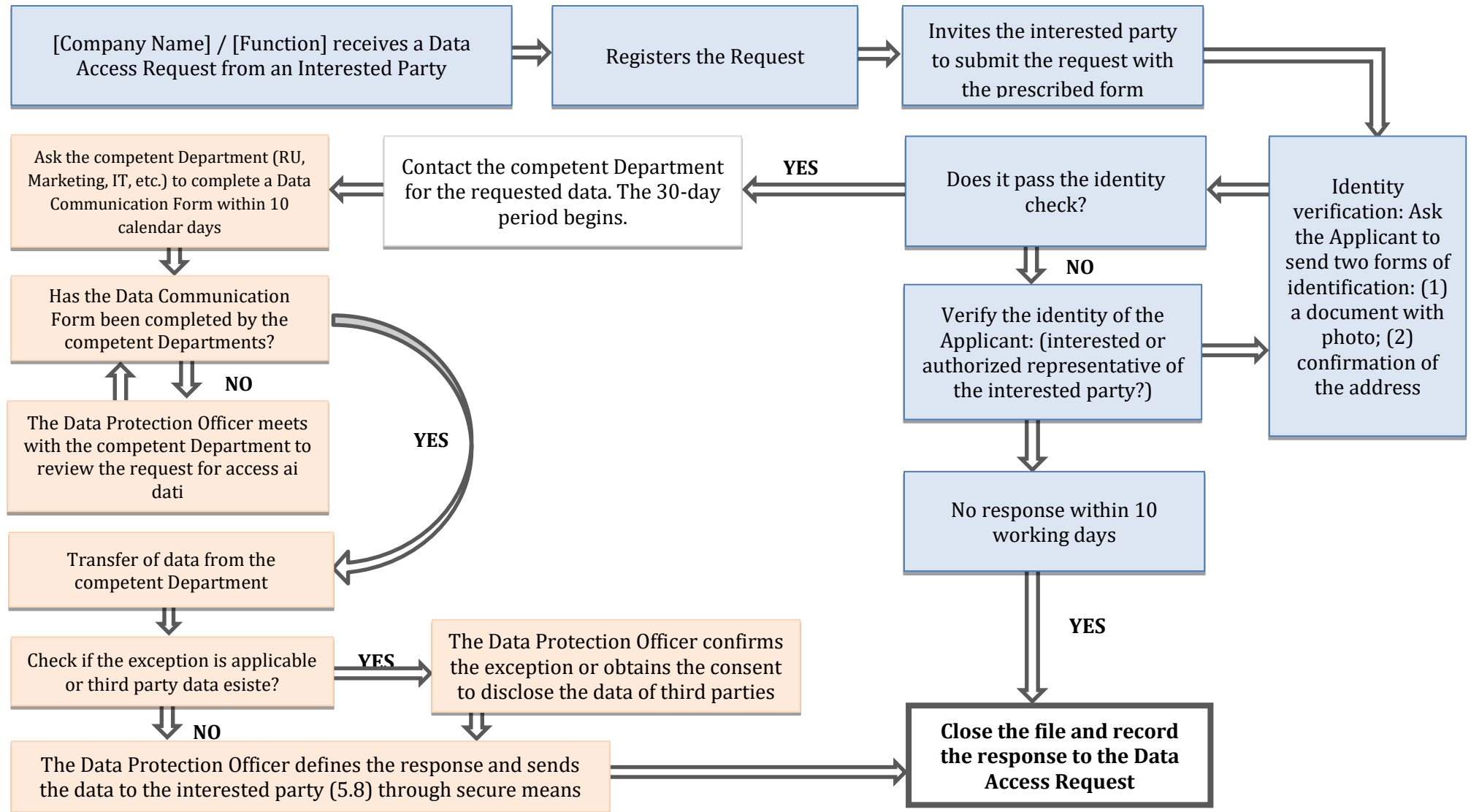
12. ATTACHMENTS

- GDI-05 Form for Requesting Data Access by the Interested Party
- GDI-06 Data Communication Form to the Interested Party

Procedure for requesting data access by the interested party

Rev. 0

30/09/2018



GDI-00 Rev.0 del 30/09/2018

Pagina 7 a 7

Figure 1-Flow chart of the Data Access Request by the interested party