

PROTECTION OF PRIVACY AND TRANSPARENCY OF THE STATE Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 PRECAUTIONS-WARNING in personal data protection matter no. 2.1.-6/19 12 Preceptor Senior Inspector of the Data Protection Inspectorate Raiko Kaur Time and place of precept 02.10.2019, Tallinn Addressee of precept Daxioma Group OÜ (14684999) Laki tn 30, Tallinn 12915 daxioma@mail.ee Contact person: Company in Estonia OÜ Laki tn 30, Tallinn 12915 info@companyinestonia.business Addressee responsible person Member of the Management Board

RESOLUTION: Pursuant to § 56 (1), (2) (8), § 58 (1) of the Personal Data Protection Act and Article 58 (2) (c) of the General Data Protection Regulation, we issue a mandatory precept: Daxioma Group OÜ representative to reply to XXXX 23.04.2019 email sent to support@daxioma.com. We set the deadline for compliance with the precept as 17.10.2019. Notify the Data Protection Inspectorate to the e-mail address info@aki.ee of the fulfillment of the precept by the deadline. CONTEST

REFERENCE: This precept can be challenged within 30 days by submitting either: - a challenge under the Administrative Procedure Act to the Data Protection Inspectorate, or - an appeal to the Tallinn Administrative Court under the Code of Administrative Court Procedure (in which case the challenge can no longer be heard). Contestation of a precept does not suspend the obligation to comply with the precept or the application of the measures necessary for compliance. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 PENALTY FINANCE WARNING: If a precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 2000 euros on the addressee of the precept: The penalty payment may be imposed repeatedly - until the precept is complied with. If the addressee does not pay the penalty payment, it is forwarded to the bailiff to start enforcement proceedings. In this case, the bailiff's fee and other enforcement costs are added to the penalty payment. WARRANTY PENALTY WARNING: Misdemeanor proceedings may be instituted for non-compliance with a precept pursuant to Article 58 (1) of the General Data Protection Regulation on the grounds of § 70 of the Personal Data Protection Act. A natural person may be fined up to EUR 20 000 000 for this act and a legal person may be fined up to EUR 20 000 000 or up to 4% of its total annual worldwide turnover, whichever is greater. The Data Protection Inspectorate conducts extra-judicial proceedings against misdemeanors. FACTUAL

FACTS: A complaint was registered with the Data Protection Inspectorate (Inspectorate) on 01.08.2019 XXXX (the complainant), according to which the complainant sent a letter to Daxioma Group OÜ on 23.04.2019 requesting the deletion of personal data and receiving explanations regarding the processing of his personal data . In addition, the complainant also sent a reminder on 23.05.2019, but Daxioma Group OÜ has not responded to the person's request. Based on the above, we

initiated state supervision proceedings and made a proposal to Daxioma Group OÜ on 15.08.2019 in case no. the deadline for replying was 17.09.2019. In the framework of both proposals, the Inspectorate also drew attention to the possibility of imposing a precept and a penalty payment. On 15.08.2019, the Supervision Authority sent a proposal to the e-mail address daxioma@mail.ee provided in the Commercial Register and to the e-mail address of Company in Estonia OÜ, contact person of Daxioma Group OÜ info@companyinestonia.business, and a repeated proposal sent on 02.09.2019 to Laki tn 30, Tallinn 12915. Regarding inquiries sent by e-mail, it should be noted that a document made available or transmitted electronically pursuant to § 27 (2) 3) of the Administrative Procedure Act is deemed to have been served if the document or notice is entered in the company's commercial register. e-mail address, in this case the e-mail address daxioma@mail.ee. To date, the representative of Daxioma Group OÜ has not responded to the proposal of the Inspectorate and has not contacted the administrative body regarding the response to the proposal.

GROUNDS FOR THE DATA PROTECTION INSPECTORATE: As can be seen from the case file, the complainant sent a letter to Daxioma Group OÜ on 23.04.2019 and a reminder on 23.05.2019 requesting the deletion of personal data and also receiving explanations regarding the processing of his personal data. Pursuant to Article 12 (3) of the General Regulation on the protection of personal data, the controller shall provide the data subject with information on the action taken on a request pursuant to Articles 15 to 22 without undue delay, but no later than one month after receipt of the request. Pursuant to Article 15 of the General Regulation on the Protection of Personal Data, the data subject has the right to request explanations regarding the processing of his or her personal data at Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry Code 70004235 and to request the deletion of personal data. Therefore, the representative of Daxioma Group OÜ should have responded to the complainant's request within one month at the latest. Pursuant to § 58 (1) of the Personal Data Protection Act and Article 58 (2) (c) of the General Data Protection Regulation, the Supervision Authority has the right to order the controller or processor to satisfy the data subject's requests regarding the exercise of his or her rights under this Regulation. Taking into account the factual circumstances and the circumstances that both responding to letters related to the processing of personal data of a data subject and responding to a proposal made within the administrative supervision procedure is mandatory, Daxioma Group OÜ is not having responded to the repeated proposal, the Inspectorate finds that the issuance of a mandatory precept in the matter is necessary to eliminate the disorder. / digitally signed / Raiko Kaur Senior Inspector on behalf of the Director General