

Tatari 39, Tallinn 10134/627 4135 / info@aki.ee / www.aki.ee / Registry code 70004235 PRECAUTIONS-WARNING in personal data protection matter no. 2.1.-1/20/3787 Preceptor Data Protection Inspectorate Time and place of precept 21.12.2020 , Tallinn Addressee of the precept Personal data processor Responsible person of the addressee Tallinn, Manufaktuuri tn 18 apartment association address: Harju county, Tallinn, North Tallinn district, Manufaktuuri tn e-mail address: info@househaldus.ee Copy to the members of the management board: xxx Member of the management board RESOLUTION pursuant to § 56 (1), (2) (8), § 58 (1) and Article 58 (1) (a) of the General Data Protection Regulation and taking into account a mandatory precept for compliance with the same paragraph: .2020. We set the deadline for compliance with the precept as 08.01.2021. 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 under the Code of Administrative Court Procedure to the Tallinn Administrative Court (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. PENALTY FINANCE WARNING: If a precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 2,000 euros on the addressee of the precept on the basis of subsection 60 (2) of the Personal Data Protection Act. 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: Failure to comply with a precept pursuant to Article 58 (1) of the General Data Protection Regulation may result in misdemeanor proceedings pursuant to § 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:. In a year, the Inspectorate received a complaint from XXX, according to which the association had not issued him with an excerpt from the video recording and had not responded to his request. The person also adds that the camera has been installed without a legal basis and without a previous decision of the general meeting, incl. He has not received explanations about the conditions of using the camera and there are no corresponding information signs. 10/10/2020 a the Inspectorate sent a proposal to the processor to the address provided in the commercial register info@househaldus.ee no later than 24.11.2020: 1. Fulfill the

person's request for access to his or her personal data and forward the person an extract from the requested recording; 2.

Discontinue use of the camera by disassembling and deleting existing recordings or providing a copy of the general meeting resolution to install the cameras, photographs of the notice labels installed, and procedures for using the cameras. GROUNDS FOR THE DATA PROTECTION INSPECTORATE: The proposal has been sent to the e-mail address provided in the commercial register of the processor. With regard to documents sent by e-mail, we note that pursuant to clause 27 (2) 3) of the Administrative Procedure Act, a document made available or transmitted electronically is deemed to have been served if the document or notice is delivered to an e-mail address entered in the commercial register. Pursuant to § 58 (1) of the Personal Data Protection Act and Article 58 (1) (a) of the General Regulation on the Protection of Personal Data, and subject to point (e) of the same paragraph, the Supervision Authority has the right to request explanations and other information, including documents necessary for supervision. Taking into account the factual circumstances and the fact that it is mandatory to respond to the request made by the administrative authority in the supervision procedure, but the processor has not responded to the Inspectorate's proposal, the Inspectorate considers that issuing a mandatory precept in the matter . If the processor has problems in responding to the inspection within the set deadline, he or she will be able to explain to the supervisory authority which objective circumstances were the obstacle. However, simply not answering is not acceptable. / digitally signed / Kadri Levand, lawyer, authorized by the Director General