

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.-6/19/10 Preceptor Senior Inspector of the Data Protection Inspectorate Sirgo Saar Time and place of precept 24.09.2019, Tallinn Addressee of the precept - processor of personal data New Horizons OÜ registry code 14413102 e-mail address: clobexprooy@gmail.com member personal identification number 38101200289 RESOLUTION: Pursuant to § 56 (1), (2) (8), § 58 (1) and Article 58 (1) (a) of the General Data Protection Regulation and subject to the same paragraph (e), the Inspectorate shall issue a mandatory precept: To a repeated inquiry sent to the Data Protection Inspectorate No. 2.1.-4/19/2649 by a member of the Management Board of New Horizons OÜ on 23.08.2019. The Inspectorate shall set the deadline for compliance with the precept on 07.09.2019. 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 an 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. 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 § 60 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 (2) of the General Data Protection Regulation may result in misdemeanor proceedings under § 69 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 is the extra-judicial body conducting misdemeanor proceedings. FACTUAL CIRCUMSTANCES: On 07.08.2019, the Data Protection Inspectorate sent an inquiry to Sergei Kastehein (Kastehein), a member of the Management Board of New Horizons OÜ, to which the addressee was obliged to answer on 19.08.2019. A member of the Management Board did not reply within the deadline. On 23.08.2019, the Inspectorate sent a repeated inquiry with the deadline for replying on 02.09.2019. The board member has not answered this either. In the framework of both inquiries, the Inspectorate drew attention to the imposition of a

precept and a penalty payment if the Inspectorate's inquiry is not answered in time. The Supervision Authority sent inquiries to the e-mail address clobexprooy@gmail.com in the name of Sergei Kastehein, Member of the Management Board, and explained that pursuant to § 25 (1) of the Administrative Procedure Act, an administrative act, summons, notice or other document is served on the party or electronically. A document made available or transmitted electronically pursuant to § 27 (2) of the HMS shall be deemed to have been served in the following cases: 3) the document or notice of making the document available has been forwarded to the company's e-mail address entered in the commercial register. To date, the representative of New Horizons OÜ has not responded to the inquiry of the Inspectorate and has not contacted the administrative body regarding the response to the inquiry. GROUNDS FOR THE DATA PROTECTION INSPECTORATE: Pursuant to § 58 (1) of the Personal Data Protection Act and Article 58 (1) (a) of the General Data Protection Regulation, the Inspectorate has the right to request explanations and other information, including documents necessary for supervision. Taking into account the factual circumstances and the fact that answering the inquiry made within the supervision procedure of the administrative body is mandatory, but New Horizons OÜ has not answered the inquiries of the Inspectorate, the Inspectorate considers that issuing a mandatory precept is necessary to find out Yours sincerely, / digitally signed / Sirgo Saar Senior Inspector Authorized by the Director General