

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.-6/20/5 Preceptor Data Protection Inspectorate Time and place of precept 10.03.2020 , Tallinn Addressee of the precept personal data processor Non-profit association Estonian Boxing Association address: Mustamäe tee 29-13, Tallinn 10616 e-mail address: eestibokser@gmail.com Person in charge of the personal data processor Member of the Management Board 8, § 58 (1) and Article 58 (1) (a) of the General Regulation on the Protection of Personal Data and taking into account point (e) of the same paragraph, the Inspectorate shall issue a mandatory precept: by 17.03.2020 at the latest. 2. To publish the data protection conditions of bokser.ee on its website no later than 10.04.2020. Please notify the Data Protection Inspectorate of the fulfillment of the precept by the deadline by info@aki.ee. 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 FUND 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 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. FACTUAL FACTS: . XXX submitted an application to the Inspectorate wishing to terminate the disclosure of his personal data on the website bokser.ee "Boxer of the Year 2018" and "Boxer of the Year 2017" in the competition results. 04.02.2020 The Inspectorate sent a proposal to the processor: To terminate the publication of the applicant's personalized data on the processor's website no later than 18.02.2020. and send a confirmation to the Inspectorate. 2/17/2020 a the processor refused to disclose the personal data. STATEMENT OF THE PERSONAL DATA PROCESSOR: 17.02.2020. The processor sent the following reply: Participation in the competition is voluntary. The rankings are publicly available on the organisation's website. The candidate is aware of this practice and thus the application received can be interpreted as consent to the processing of the data. If a candidate for the title of "Boxer of the Year" finds that his / her data has been treated incorrectly, the candidate may request that the data be removed from the EBU website within a reasonable time after he / she became aware of or should have become aware of the publication of his / her data on the EBU

website. Given the principles of reasonableness, the basis for voluntary participation, the candidate's conscious competition practices, given his previous membership of the EBU Board and the EBU Board, the EBU Board does not consider that XXX's rights to access the data on his dog XXX are violated on EBU's website. Accordingly, the EBU Board does not accept XXX's request to remove information about him and his dog, XXX, from the articles "Boxer 2018" and "Boxer 2017" on the EBU's public website without delay. himself, that is, it cannot be said that he did not consent to the disclosure of this information. The position of the EBU Board is still the same. XX had its own consent to reflect the results and, as mentioned, he posted the results and names on the EBU website and handled the information on it.

GROUNDWORK FOR THE DATA PROTECTION INSPECTORATE: The Inspectorate explains that any processing of personal data requires a basis under Article 6 of the General Data Protection Regulation. later published deleted and in this case the current practice must be followed. Persons submitting their pet to the competition must be prepared for the name of the owner to be processed in this connection in addition to the data of the participating animal (which is not considered personal data). Disclosure of the results of the competition is necessary in the interests of transparency of the competition and control of the accuracy of the results, but even then the processor must proceed on the basis that the data is disclosed to the public to the minimum extent necessary to fulfill the purpose. The Inspectorate reviewed what was published and in both cases identified the sentences attached to the results that are redundant to fulfill the purpose of publishing the competition results: RESULT ANNULLED BY THE DECISION OF THE BOARD 07.01.2020 - Violation of the competition rules by XXX. RESULT ANNOUNCED BY THE DECISION OF THE MANAGEMENT BOARD 07.01.2020 - Violation of the competition rules by XXX. We consider that there is no justification or legal basis for disclosing the reasons for the cancellation of the result to the public. Thus, the results of the competition have been published in the same way without the sentence "Violation of the competition rules by XXX". We explain that the decisions of the management board referred to in the results, in respect of which the association stopped disclosing, need to be notified to the members of the NGO, but the Inspectorate did not establish that the obligation to disclose them arises from law and should be disclosed to the public. Disclosure of the results of the competition and the decisions of the association in this form in an identifiable manner, together with various additional information (eg who has violated the conditions), will unreasonably harm the persons outside the activities of the association. Therefore, we are obliged by a precept to publish the results of the competition and the decisions of the association in such a way that they do not contain personal data, the disclosure of which outside the activities of the association violates the rights of individuals. / digitally signed / on behalf of the

