

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.-6/21/4 Preceptor of the Data Protection Inspector Raiko Kaur Date and place of issue of the precept 23.02.2021, Tallinn Addressee of the precept and responsible person Vladislav Krivorutško (ik 38909223728) xxx xxx xxx xxx RESOLUTION: § 56 (1), (2) (8), § 58 (1) of the Personal Data Protection Act and § 58 In accordance with Article 58 (1) (d) and (2) (f) and (g) of the General Regulation on the Protection of Human Rights and Fundamental Freedoms, and subject to Articles 5, 6, 12 and 13 of the ICCAT, com collection of personal data (including eliminating the possibility of entering personal data); 2. Stop disclosing personal information on the website www.44finance.com; 3. Delete all personal data collected through the website www.44finance.com; 4. Terminate the collection of personal data on the website www.intral.ee (incl. Eliminate opportunities to enter personal data); 5. Stop disclosing personal data on the website www.intral.ee; 6. Delete all personal data collected through the website www.intral.ee; 7. Check all the domains registered in your name (incl. German-auto.ee, dvaa.ee, kloostriait.ee, lepk.ee, voimalused.ee, wiris.ee, karuvald.ee, kiisatamme.ee, tantsufestival.ee, quick loan offers .ee, graniidist.ee, e-laen.ee, superchat.ee, merkotartu.ee, kiatalinn.ee, vaa.ee, gryyne.ee, hausma.ee, marble.ee, kivikasukas.ee, 1kiirlaen.ee, Russians .ee, rabota-v-estonii.ee, genomics.ee, illukavv.ee, esec.ee, revalcredit.ee, kreditikassa.ee, monetti.ee) and to stop the illegal processing of personal data on these websites (incl. to eliminate opportunities personal data and delete all personal data collected). Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 8. Terminate the activity (practice) where you register a domain name, use the content of the previous registrant's website and collect personal data through it illegally. We set the deadline for compliance with the precept as 10.03.2021. 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 WARNING: If the precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 1000 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 (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:** The Data Protection Inspectorate (Inspectorate) received a complaint from a person on 28.09.2020, which stated, inter alia, the following: The disclosed personal data can be found here: <https://44finance.com/en/laenud/kiirlaen/> In view of the above, the Supervision Authority initiated supervision proceedings on the basis of clause 56 (3) 8) of the APA. At <https://44finance.com/en/> a window (Consultant) will automatically open with two questions: "Hello. Do you want a loan? "And" How can I help? ". The Inspectorate wrote in the window that opened, which was answered "I will answer you by e-mail" and "Leave your contact details and we will answer your questions". The Inspectorate entered its e-mail address there, after which the Inspectorate started receiving loan offers from various companies from the e-mail address [info@intral.ee](mailto:info@intral.ee). After that, the Inspectorate also checked the website [www.intral.ee](http://www.intral.ee) and established that personal data has also been disclosed on this website: <https://intral.ee/laenud/kiirlaen/>. Personal data is also collected through this website, for example, it is mandatory to enter an e-mail address in order to receive loan offers, and it is also possible to enter a name, age and telephone number. Then the Inspectorate sent an inquiry to the Estonian Internet Foundation, in which we wanted to know Tatari tn 39/10134 Tallinn / 627 4135 / [info@aki.ee](mailto:info@aki.ee) / [www.aki.ee](http://www.aki.ee) Registry code 70004235 the following: 1. To forward the data submitted upon registration of the domain [intral.ee](http://intral.ee) (especially name, personal / commercial registry code, e-mail address, residence / seat). 2. Please also provide any views, explanations and justifications you consider necessary. The Estonian Internet Foundation replied that the registrant of the domain name [intral.ee](http://intral.ee) is Vladislav Krivorutško (ik 38909223728). The reply also stated the following: In other respects, we note that this person uses a certain pattern where the person registers the deleted domain names and uploads the same content to the websites as was the case with the deleted domain name. **EXPLANATION OF THE PROCESSOR OF PERSONAL DATA** Pursuant to § 40 (3) 1) of the Administrative Procedure Act, administrative proceedings may be conducted without hearing the opinion and objections of a participant in the proceedings if immediate action is necessary to prevent damage resulting from delay or to protect public interests. The Supervision Authority is of the opinion that a situation where a data processor registers a deleted domain name and uploads

the same content to the website as it did on the website related to the deleted domain name, regardless of the processing of personal data (incl. should be stopped as soon as possible. In doing so, the Inspectorate took into account what has been published on the website <https://44finance.com/en/laenud/kiirlaen/> with the name of the person, for example: "I am in tears because no one gives me 200 euros. We escaped the violence with the children, but now we saw. We have nowhere to ask for help "and" The bubble was my last income 3 months ago (currently only lats 60 euros. Given that the above information is public (including through the Google search engine) and that the complaint material also shows that In addition, the Inspectorate also takes into account the fact that it is not possible for people to contact the data controller themselves due to the lack of effective contact details on the web pages. a person is a person who receives, directly or indirectly t, in particular on the basis of its identification, such as name, personal identification number, contact details (see Article 4 (1) of the CISA).

There are several places on the website [www.44finance.com](http://www.44finance.com) where personal information is collected, such as first name, last name, personal identification number, telephone number and e-mail address. Thus, the processing of personal data takes place via the above-mentioned website. When the Inspectorate entered its e-mail address on the website [www.44finance.com](http://www.44finance.com), loan offers were sent to the Inspectorate from the e-mail address [info@intral.ee](mailto:info@intral.ee). Based on this, it can be seen that the data collected through the website [www.44finance.com](http://www.44finance.com) is transferred to the administrator of the [intral.ee](http://intral.ee) domain. Vladislav Krivorutško is the registrar of the [intral.ee](http://intral.ee) domain name. Thus, Vladislav Krivoruchko processes personal data through the website [www.44finance.com](http://www.44finance.com). When checking the website [www.intral.ee](http://www.intral.ee) during the supervision procedure, Tatari tn 39/10134 Tallinn / 627 4135 / [info@aki.ee](mailto:info@aki.ee) / [www.aki.ee](http://www.aki.ee) Registry code 70004235 website also mentions several places where personal data is collected, including name, age, e-mail address, telephone number. Thus, personal data is also processed on this website. Considering that the domain name [intral.ee](http://intral.ee) has been registered by Vladislav Krivorutško, Vladislav Krivorutško also processes personal data through the website [www.intral.ee](http://www.intral.ee). In view of the above, Vladislav Krivorutško is obliged to follow the requirements set out in the IKÜM when processing personal data. In doing so, the processing of personal data must ensure that it complies with the principles set out in Article 5 of the CISA, including paragraph 1 (a), (b) and (f): - the processing is lawful, fair and transparent to the individual; - personal data are collected for specified, explicit and legitimate purposes; - Personal data are processed in a way that ensures appropriate security of personal data, including protection against unauthorized or illegal processing. If the processing of personal data does not comply with the principles set out in Article 5 of the CISA, the processing of personal data is prohibited. Compliance with these principles is the responsibility of the data

controller itself (see Article 5 (2) of the CISA). According to Article 5 (1) (a) of the CISA, the processing of personal data must be lawful, fair and transparent to the individual. However, the principle of transparency presupposes that all information and messages related to the processing of personal data are easily accessible, comprehensible and clearly worded. In other words, data protection conditions must be in place. The content of the data protection conditions is governed by Articles 12 to 14 of the CISA. It must also be borne in mind that the information provided for in Article 13 (On the basis of Article 6 (1) of the CISA) and (precisely and clearly defined) personal data are processed on the website. When viewing the websites [www.44finance.com](http://www.44finance.com) and [www.intral.ee](http://www.intral.ee), the above information is not available on these websites. In addition, in accordance with Article 5 (1) (f) of the CISA, personal data must be processed in a way which ensures appropriate security for the personal data, including protection against unauthorized or unlawful processing. Looking at the websites [www.44finance.com](http://www.44finance.com) and [www.intral.ee \(https://intral.ee/laenud/kiirlaen/\)](https://intral.ee/laenud/kiirlaen/), the names of people and the contents of their address are published on both pages. For example, the following link has been published at <https://44finance.com/en/laenud/kiirlaen/>: "The bubble was my last income 3 months ago (currently only lats 60 euros. but not officially "; -" I'm in tears because no one is giving me € 200. The content of his letter published by Com has been (re) published (used) by a third party (the new company on its website). (even if we escaped violence with children) in which the disclosure of the data is excessively harmful to the person (including children). I write to the data controller at the time and request the removal of your data. In a specific case, however, the websites [www.44finance.com](http://www.44finance.com) and [www.intral.ee](http://www.intral.ee) do not contain any information as to who is the controller and to whom their contact should be forwarded (incl. There are no valid contact details). Based on the above, the processing of personal data (incl. Collection, disclosure) on the websites [www.44finance.com](http://www.44finance.com) and [www.intral.ee](http://www.intral.ee) is prohibited and all collected data must be deleted immediately. In addition, the Estonian Internet Foundation has indicated to the Inspectorate that Vladislav Krivorutško registers deleted domain names on Tatari tn 39/10134 Tallinn / 627 4135 / [info@aki.ee](mailto:info@aki.ee) / [www.aki.ee](http://www.aki.ee) Registry code 70004235 and uploads the same content to the website as on the deleted website. . It is therefore doubtful that other websites related to domain names registered by Vladislav Krivoruchko also meet the requirements set out in the ICCM. Therefore, Vladislav Krivorutško must check all the domains registered in his name (incl. [German-auto.ee](http://German-auto.ee), [dvaa.ee](http://dvaa.ee), [kloostriait.ee](http://kloostriait.ee), [lepk.ee](http://lepk.ee), [voimalused.ee](http://voimalused.ee), [wiris.ee](http://wiris.ee), [karuvald.ee](http://karuvald.ee), [kiisatamme.ee](http://kiisatamme.ee), [dance festival .ee](http://dance festival .ee), [kiirlaenupakkumised.ee](http://kiirlaenupakkumised.ee), [graniidist.ee](http://graniidist.ee), [e-laen.ee](http://e-laen.ee), [superchat.ee](http://superchat.ee), [merkotartu.ee](http://merkotartu.ee), [kiatallinn.ee](http://kiatallinn.ee), [vaa.ee](http://vaa.ee), [gryyne.ee](http://gryyne.ee), [hausma.ee](http://hausma.ee), [marble.ee](http://marble.ee), [kivikasukas.ee](http://kivikasukas.ee), [1kiirlaen .ee](http://1kiirlaen .ee), [venelased.ee](http://venelased.ee), [rabota-v-estonii.ee](http://rabota-v-estonii.ee), [genomics.ee](http://genomics.ee), [illukavv.ee](http://illukavv.ee), [esec.ee](http://esec.ee), [revalcredit.ee](http://revalcredit.ee), [kreditikassa.ee](http://kreditikassa.ee), [monetti.ee](http://monetti.ee)) and to stop

illegal personal data on the websites related to these domains. processing (including eliminating the possibility of entering personal data and deleting all personal data collected). Further practices (activities) where the domain name is registered, the content of the previous registrant's website is used and personal data is collected through it must also be stopped. - Pursuant to § 58 (1) of the Personal Data Protection Act and Article 58 (2) (f) and (g) of the General Data Protection Regulation, the Supervision Authority has the right to impose a temporary or permanent restriction on the processing of personal data, including a ban on processing. Taking into account the factual circumstances and the fact that personal data are processed (incl. Collected, disclosed) illegally in a specific case (data processing does not meet the requirements set out in Articles 5, 6, 12 and 13 of the CISA), the Inspectorate considers it necessary to terminate offense as soon as possible. / digitally signed / Raiko Kaur, lawyer, authorized by the Director General