

Tatari 39, Tallinn 10134/627 4135 / info@aki.ee / www.aki.ee / Registry code 70004235 PRECAUTIONS-WARNING in personal data matter no. 2.1.-6/20/19 Preceptor Data Protection Inspectorate Time and place of precept Addressee of the precept Personal data processor Korokiühistu OUTOKUMPU 19 address: Outokumpu tn 19-47, 30327 Kohtla-Järve e-mail address: outokumpu19@hotmail.ee Person in charge of the personal data processor member of the management board

RESOLUTION § 56 (1) (2) 8) of the Personal Data Protection Act § 58 (1) and Article 58 (1) (a) of the General Regulation on the Protection of Personal Data and taking into account subparagraph (e) of the same paragraph, the Inspectorate shall issue a mandatory precept to: 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 FINANCE WARNING: If a precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 500 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: A member of the association submitted a complaint to the Inspectorate with photographs that the personal data of him and other members of the association had been published in the stairwell of the building without prior consent (apartment number, name, signature).

4/16/2020 The Inspectorate sent a proposal to the processor: 1 Terminate any further disclosure of personal data of the members of the association to third parties, including in public premises (stairwells of the building) and send a confirmation thereof to the address of the Inspectorate info@aki.ee no later than 23.04.2020. a .. 24.04.2020. A member of the cooperative filed a new complaint with new photos (a list of signatures that agree to turn off the heating by apartment number).

EXPLANATION OF THE PROCESSOR OF PERSONAL DATA: The processor has not exercised his right to submit objections and opinions and further discloses personal data in the stairwells of the building. GROUNDS FOR THE DATA PROTECTION INSPECTORATE: The Supervision Authority explains that any processing of personal data requires a basis under Article 6 of the General Data Protection Regulation. In this case, this can only be with the prior consent of the persons. We explain that the

general rule when disclosing the data of the members of an apartment association is that it is allowed in the internal relationship (between the members of the association) and in the external relationship (for third parties) the prior consent of the persons is required. Please note that publishing personal data in the stairwell and other places accessible to third parties or on the Internet is against the law, as the data is also visible to third parties. It is also forbidden to publish only the apartment number, as according to it the names of the owners can be identified either from the land register or from another public register. We also recommend that you read the Inspectorate's instructions for disclosing the data of members of an apartment association. The principles of the guide apply to the disclosure of all personal data, not just debt-related data. Based on the above, the precept obliges the further disclosure of the data of the members at the place where the disclosure is also accessible to third parties. Unless each person gives his or her consent in a form that can be reproduced in writing, that he or she consents to the disclosure of his or her personal data, for example, in the stairwell of the building (incl. It must be agreed what the data is). In addition, it must be borne in mind that any person can withdraw their consent at any time. Consent must be given voluntarily and an alternative must be offered to those who do not consent to the disclosure of personal data in this way. / digitally signed / on behalf of the Director - General