

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.-6/20/16 Preceptor

Senior Inspector of the Data Protection Inspectorate Sirgo Saar Time and place of precept 23.04.2020, Tallinn Recipient of the

precept - processor of personal data Bolt Technology OÜ registry code 12417834; Tallinn, Vana-Lõuna tn 15, 10134. e-mail:

notices@bolt.eu; privacy@bolt.eu Person in charge of the personal data controller Member of the Management Board

RESOLUTION: Subject to § 56 (1), (2) (8), § 58 (1) and Article 58 (1) (a) of the General Data Protection Regulation the

Inspectorate shall comply with the mandatory precept: 1. To respond to the inquiry sent by Bolt Technology OÜ to the Data

Protection Inspectorate No. 2.1.-1/19/3956 of 08.04.2020. The Inspectorate shall set the term for compliance with the precept

as 04.05.2020. 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. PROHIBITION OF PROHIBITION OF ECONOMIC ACTIVITIES:

Pursuant to § 7 (4) and § 36 (1) of the General Part of the Code of Economic Activities Act, an economic administration

authority may prohibit an economic activity from an undertaking or a person related to an undertaking due to a material

violation. FACTUAL CIRCUMSTANCES: On 08.04.2020, the Data Protection Inspectorate sent an inquiry to Bolt Technology

OÜ, to which the addressee was obliged to respond on 20.04.2020. Bolt has not responded to the inspection in time. As part of

the inquiry, 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 an inquiry to the e-mail addresses notices@bolt.eu and privacy@bolt.eu provided in the Commercial Register and explained that pursuant to § 25 (1) of the Administrative Procedure Act (HMS), 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, Bolt Technology OÜ has not responded to the inspection's inquiry or requested an extension of time to respond. EXPLANATION OF THE PERSONAL DATA PROCESSOR: The Supervision Authority asked Bolt Technology OÜ to respond to an inquiry to which Bolt has not responded in a timely manner. The Inspectorate gave Bolt a reasonable time to respond. The Inspectorate has thereby fulfilled its obligation under § 40 (1) of the Administrative Procedure Act to give the participant in the proceedings an opportunity to submit an opinion and objections on the matter before issuing the administrative act. 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. Pursuant to § 25 (1) of the Administrative Procedure Act (HMS), an administrative act, summons, notice or other document is served on a participant in the proceedings by post, by the administrative authority which issued the document or electronically. Taking into account that answering an inquiry made within the supervision procedure of an administrative authority is mandatory, but Bolt Technology OÜ has not responded to the inquiries of the Inspectorate, the Inspectorate finds that issuing a mandatory precept is necessary to find out the essential circumstances of the supervision. Yours sincerely, / digitally signed / Sirgo Saar Senior Inspector Authorized by the Director General