

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.-6/19/11 Preceptor

Senior Inspector of the Data Protection Inspectorate Sirgo Saar Time and place of precept 27.09.2019, Tallinn Addressee of

the precept - processor of personal data Euro Wealth OÜ registry code 14183116 Address: Roosikrantsi tn 2-6, 10119 e-mail

address: K006 @ 000.ee; agent@000.ee; allprotech.oy@eesti.ee; nostro.technology.oy@eesti.ee; 14183116@eesti.ee

Person in charge of the personal data processor Member of the Management Board Personal identification code

1-651120-5137 (Hungary) RESOLUTION: § 56 (1), (2) (8), § 58 (1) of the Personal Data Protection Act and Article 58 (1) of

the General Data Protection Regulation a) and taking into account e) of the same paragraph, the Supervision Authority shall

issue a mandatory precept for compliance with: 1. To respond to a repeated inquiry sent to the Data Protection Inspectorate

No. 2.1.-1/19/2592 by a member of the Management Board of Euro Wealth OÜ The Supervision Authority shall set the

deadline for compliance with the precept at 11.10.2019. 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 13.08.2019, the Data Protection Inspectorate sent an inquiry to Zoltan Korcsog, a member

of the Management Board of Euro Wealth OÜ, to which the addressee was obliged to respond on 23.08.2019. A member of

the Management Board did not reply within the deadline. On 27.08.2019, the Inspectorate sent a repeated inquiry with a deadline of 06.09.2019. The board member did not answer 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 Inspectorate sent inquiries to the e-mail addresses allprotech.oy@eesti.ee provided in the Commercial Register; nostro.technology.oy@eesti.ee; 14183116@eesti.ee to KRM Agent OÜ indicated in the name and contact of Zoltan Korcsog, Member of the Management Board, at K006@000.ee agent@000.ee and explained that pursuant to § 25 (1) of the Administrative Procedure Act (HMS), an administrative act, summons, notice or other document served on a party to the proceedings by post, by the administrative authority which issued the document 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 Euro Wealth OÜ has not responded to the inquiry of the Inspectorate and has not contacted the administrative body regarding the response to the inquiry. The precept has been sent by registered mail to Roosikrantsi tn 2-6, 10119. According to the Commercial Register, the contact address has been KRM Agent OÜ.

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 Euro Wealth 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