

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 / 20/2 Preceptor Data Protection Inspectorate Time of precept and place 13.02.2020, Tallinn Addressee of the precept - personal data processor Pizzakoju OÜ address: Heki tee 4, Tallinn 12112 e-mail address: info@pizzakoju.ee Person in charge of the personal data processor member of the management board representative of the personal data processor lawyer Ivo Kallas e-mail address: ivo.kallas@kochpartners.ee RESOLUTION: Subject to § 56 (1), (2) (8), § 58 (1) of the Personal Data Protection Act and Article 58 (1) (a) of the General Data Protection Regulation, and subject to the same paragraph (e), we issue a mandatory precept: I Information requested in the additional inquiries sent to the Data Protection Inspectorate on 13.11.2019 No. 2.1.-1/19/1929 and 16.01.2020 No. 2.1.-1/19/1929: 1. E to provide the Inspectorate with the data protection conditions created in accordance with Articles 12 - 14 of IKÜM1, which were available to customers when ordering from the website www.pizzakoju.ee as of 13.05.2019. 1.1. explain whether and how the data protection conditions were communicated to customers; 1.2. in the absence of data protection conditions, confirm this. 2. If the data protection conditions established pursuant to Articles 12 to 14 of the CISA have changed compared to the document referred to in point 1, the most recent document shall also be forwarded to the Supervision Authority. 2.1. clarify whether and how customers can consult the data protection conditions. 2.2. in the absence of data protection conditions, confirm this. 3. Who, on what date and where exactly deleted the data related to the email address XXX? 4. To forward to the Inspectorate all agreements entered into on the basis of Article 28 of the CISA concluded between Pizzakoju OÜ and courier service providers / providers. 5. Explain thoroughly and comprehensibly what (contractual) relationship Pizzakoju OÜ had with XXX between 13.05.2019 and 20.05.2019. 6. Explain thoroughly and comprehensibly why Pizzakoju OÜ responded to the request sent to the e-mail address XXX, XXX (the answer was submitted on 19.05.2019). 7. Submit to the Inspectorate an overview of the processing of personal data established on the basis of Article 30 of the CISA. 1 General Regulation on the Protection of Personal Data Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 8. Describe in the framework of your business activities in which situations (incl. On the basis of which) it is sufficient to document violations and in which cases the inspectorate should also be informed and in which cases the data subject. 9. Provide the Inspectorate with log records of the electronic database showing when the complainant's telephone number (XXX), address (XXX) and e-mail address (XXX) were added to the database. 10. Provide the Inspectorate with log records of the electronic database showing when the complainant's telephone number (XXX), address

(XXX) and / or e-mail address (XXX) were deleted from the database. 11. If Pizzakoju OÜ does not have a logging system when using the electronic database, explain thoroughly and comprehensibly how Pizzakoju OÜ ensures that the data is not misused in the database and that it is possible to determine afterwards who has viewed, changed or deleted the data? 12. Submit a sample of the original accounting document (invoice), which would show all the data that will be added to the private account of Pizzakoju OÜ if the order is made through the website www.pizzakoju.ee. We set the deadline for compliance with the precept as 06.03.2020. 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 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 the precept is not complied with by the specified deadline, the Data Protection Inspectorate shall impose a separate penalty of 500 euros per violated point for each violation of the precept (§ 1 - 12). 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 CIRCUMSTANCES: In the proceedings of the Data Protection Inspectorate (Inspectorate), there is a supervisory matter in the matter of personal data protection. As part of the supervision procedure, the Inspectorate submitted an inquiry to Pizzakoju OÜ in matter no. 2.1.-19/1929 on 13.11.2019, the deadline for replying of which was 27.11.2019. On 14.11.2019, a representative of Pizzakoju OÜ sent a letter to the Inspectorate requesting an extension of the deadline for answering the inquiry until 31.01.2020 due to XXX reasons. On the basis of the mentioned application Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee On the basis of registry code 70004235, the Inspectorate extended the deadline for replying until 31 January 2020. On 16 January 2020, the Inspectorate submitted in case no. 2.1. an additional inquiry requesting additional information in addition to the information

submitted on 13.11.2019. The deadline for replying to this request was also 31.01.2020. In the additional inquiries sent on 13.11.2019 and 16.01.2020, the Data Protection Inspectorate drew attention to the imposition of a precept and a penalty payment if the Inspectorate's inquiry is not answered by the set deadline. As of today, Pizzakoju OÜ has not answered any questions that were submitted in the inquiries sent to the Inspectorate on 13.11.2019 and 16.01.2020. On 31.01.2020, a representative of Pizzakoju OÜ sent a letter to the Inspectorate requesting to extend the deadline for submitting a response until March 6, 2020 due to the need for additional inspection of the materials and clarification of the circumstances. also repeatedly encountered. 04.06.2019 Pizzakoju OÜ wanted to extend the deadline for replying in connection with the holiday period and disciplinary proceedings. On 24.09.2019, the representative of Pizzakoju OÜ requested an extension of the deadline for replying due to the heavy workload. And after the aforementioned applications for extension also the above applications on 14.11.2019 and 31.01.2020 respectively. Pizzakoju OÜ has also failed to respond to previous inquiries in a timely manner during the supervision procedure, which is why the Inspectorate has made repeated inquiries. The inquiry submitted on 30.05.2019 was not answered in time, which is why we made a repeated inquiry in this regard on 10.07.2019. In addition, an application for an extension was missed between the two inquiries, ie Pizzakoju OÜ requested an extension of the deadline for replying, which the Inspectorate did. However, Pizzakoju OÜ also did not reply for an additional period. The inquiry sent to the Inspectorate on 08.08.2019 was also not answered in time, which is why we made a repeated inquiry on 29.08.2019. 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 it is mandatory to respond to inquiries made within the supervision procedure of the administrative body, but Pizzakoju OÜ has not responded to the Inspectorate's inquiries in time, the Inspectorate considers that issuing a mandatory precept in this matter is In the present case, the supervision procedure has also lasted an unreasonably long time, primarily due to the fact that Pizzakoju OÜ has not responded to the inquiries of the Inspectorate in time and has repeatedly requested to extend the deadlines for replying. Pizzakoju OÜ has also failed to respond in a timely manner in a situation where the Inspectorate has given a longer deadline for replying. Nevertheless, the Inspectorate has repeatedly responded to requests for extensions. However, the administrative procedure must be carried out as efficiently as possible, including as quickly as possible, which is why the Inspectorate cannot extend the deadlines for answering indefinitely

and prepare repeated inquiries with the same questions, but with a new deadline. Considering the above, and also the fact that Pizzakoju OÜ wanted to extend the deadline for replying until March 6, 2020, we set the deadline for compliance with the precept as March 6, 2020. / digitally signed / Raiko Kaur Senior Inspector on behalf of the Director General