

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 Issuer Senior Inspector of the Data Protection Inspectorate Maria Muljarova Time and place of precept 16.03.2020, Tallinn Addressee of the precept Responsible person of the addressee Worldforce Estonia OÜ (14252969) Tallinn, Väike-Ameerika tn 19, 10129 Harjumaa roland.lao@hotmail.com info@staff24.ee Roland Lao Member of the Management Board RESOLUTION : Pursuant to § 58 (1) and (2) (8) of the Personal Data Protection Act, as well as Article 58 (2) (d) of the General Data Protection Regulation, the Inspectorate issues a mandatory precept to: No. 2.1.-4/19/4434) from the instructions / explanations set out in the proposal and forward it to the Inspectorate to help. We set the deadline for compliance with the precept as 30.03.2020. The precept must be complied with by the deadline by the Data Protection Inspectorate's e-mail address 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 4000 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 a penalty payment at Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235, it shall be forwarded to a bailiff for the commencement of 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: Pursuant to § 56 (3) 8) of the Personal Data Protection Act (DPA), the Data Protection Inspectorate initiated an own-initiative supervision procedure aimed at ascertaining the legal basis and purpose of the legal entity Worldforce Estonia OÜ, registry code 14252969. through job advertisements published on the portal. The processor of personal data does not use personal data only for the purpose of fulfilling the agreement concluded

with the unemployment fund, but stores the personal data of candidates in order to provide labor to other employers in the future. The Inspectorate also wanted to establish how the transfer of personal data to third parties is regulated in the company. On 6 December 2015, the Inspectorate sent an inquiry to Worldforce Estonia OÜ to the e-mail addresses roland.lao@hotmail.com and info@staff24.ee in the matter of personal data protection, setting the deadline for replying on 18 December 2019, to which Worldforce Estonia OÜ did not reply. Therefore, the Data Protection Inspectorate forwarded a repeated inquiry on 08.01.2020, setting the deadline for replying on 20.01.2020. As part of the repeated inquiry, the Inspectorate also drew attention to the possibility of imposing a precept and a penalty payment. On 16.01.2020, Worldforce Estonia OÜ submitted a reply, in which it was explained that the candidates published by the Unemployment Insurance Fund had given their oral consent to the storage and further use of their CVs by telephone. On 28 January 2020, the Data Protection Inspectorate proposed to Worldforce Estonia OÜ to prepare a consent form that complies with the conditions provided by law, which enables the data processor to prove compliance with the conditions related to the processing of personal data. In the proposal, the Inspectorate also explained the conditions of the consent and then asked to submit the consent form to the Inspectorate for review as soon as possible, but not later than March 2, 2020. Worldforce Estonia OÜ has not yet complied with the Data Protection Inspectorate's proposal. In the proposal, the Inspectorate referred to the possibility of imposing a precept and a penalty payment. GROUNDS FOR THE DATA PROTECTION INSPECTORATE: Pursuant to § 58 (1) and (2) 8) of the Personal Data Protection Act, as well as Article 58 (2) (d) of the General Data Protection Regulation, the Data Protection Inspectorate has the right to order the controller to process personal data comply with the provisions of this Regulation. Taking into account the factual circumstances and the fact that compliance with the proposal of the administrative body made in the framework of the supervision procedure is mandatory, the Inspectorate considers that the issuance of a mandatory precept is necessary to eliminate the irregularity. / digitally signed / Maria Muljarova Senior Inspector on behalf of the Director General