

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.-6/19/8 Preceptor Senior Inspector of the Data Protection Inspectorate Raiko Kaur Time and place of precept 05.09.2019, Tallinn Addressee of the precept BLACKETING UÜ (12940820) Väike-Turu tn 5, Tallinn 51013 info@blacketing.com Person responsible for the addressee General partner 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 clause (e) of the same paragraph, we issue a mandatory precept to: We set the deadline for compliance with the precept as 17.09.2019. 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 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 OF WARRANTY: If a precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 2000 euros on the addressee of the precept on the basis of § 60 of the Personal Data Protection Act. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 A 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. Within the framework of the state supervision procedure, the Inspectorate submitted an inquiry to BLACKETING UÜ in case no. 2.3. In the framework of both inquiries, the Inspectorate also 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 an inquiry sent on 25.07.2019 to the e-mail address info@blacketing.com in the commercial register and

to the e-mail address kalev.kosk@blacketing.com in the commercial register of Mr Green OÜ, a general partner of BLACKETING UÜ, and to the repeated inquiry e-mail addresses 15.08.2019 blacketing.com and kalev.kosk@blacketing.com and the company address Väike-Turu tn 5, Tartu 51013 listed in the Commercial Register. a document made available or forwarded shall be deemed to have been delivered if the document or notice has been forwarded to an e-mail address entered in the company's commercial register, in this case to the e-mail address info@blacketing.com. To date, the representative of BLACKETING UÜ has not responded to the inspection's inquiry and has not contacted the administrative body regarding the response to the inquiry. 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 authority is mandatory, but BLACKETING UÜ has not answered the inquiry of the Inspectorate on 25.07.2019 and repeated inquiries on 15.08.2019, the Inspectorate considers that issuing a mandatory precept in this matter and to eliminate possible disorder. / digitally signed / Raiko Kaur Senior Inspector on behalf of the Director General