

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.-6/21/14 Preceptor Raiko Kaur Time and place of precept 14.05.2021, Tallinn Addressees of the precept Unpredictable Computing OÜ (14224743) Kadaka tee 72a, Tallinn 12615 unpredictable@internet.ru info@vindazo.de Persons responsible for the addressees Member of the Management Board RESOLUTION: § 56 (1) of the Personal Data Protection Act, § 2 (8), § 58 (1) and Article 58 (1) (a) of the General Regulation on the Protection of Personal Data and taking into account point (e) of the same paragraph, the Data Protection Inspectorate shall issue a mandatory precept to Unpredictable Computing OÜ to comply with: 20/3013 to the inquiry sent: 1. In which country is the board of Unpredictable Computing OÜ located? Provide the exact address of the board location. 2. Are decisions on the processing of personal data taken in the country referred to in point 1? 2.1.If not, in which country and on the basis of which decisions related to the processing of personal data are taken (provide specific evidence). 3. If the place or places of business of Unpredictable Computing OÜ (location of the management board, adoption of decisions related to the processing of personal data) are outside the European Union, submit to the Inspectorate the name (contact details) of the representative appointed in the European Union. We set the deadline for compliance with the precepts as 28.05.2021. Notify the Data Protection Inspectorate to the e-mail address info@aki.ee of the fulfillment of the precept by the deadline. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 CONTEST REFERENCE: This precept can be contested within 30 days by submitting either: - a challenge to the Data Protection Inspectorate pursuant to the Administrative Procedure Act, or - a complaint to Tallinn under the Code of Administrative Court Procedure. To the Administrative Court (in which case the challenge can no longer be heard in the same case). 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 the precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment of 5,000 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 (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: The Data Protection Inspectorate (Inspectorate) received a complaint from a German data protection authority via a cross-border system concerning the disclosure of xxx personal data on the website www.vindazo.de. Based on the above, the Supervision Authority initiated supervision proceedings on the basis of clause 56 (3) 8) of the Personal Data Protection Act (IKS). As this is a cross-border supervision procedure, it is necessary for the Inspectorate to find out which of the data protection authorities of a Member State of the European Union is the leading authority in conducting the procedure. It is therefore important to identify the company's principal place of business (see Article 4 (16) of the General Regulation on the Protection of Personal Data). In other words, the Supervision Authority needs to know where the seat of the Management Board is located in the Union or in a situation where decisions concerning the purposes and means of the processing of personal data are taken at another place of business located in the Union. In order to find out the above, the Inspectorate sent an inquiry to Unpredictable Computing OÜ in case number 2.1.-1/20/3013 in the course of supervision proceedings, the deadline for replying of which was 04.05.2021. In the inquiry, we wanted to know the following: 1. In which country is the board of Unpredictable Computing OÜ located? Provide the exact address of the board location. 2. Are decisions on the processing of personal data taken in the country referred to in point 1? 2.1. If not, in which country and on the basis of which decisions on the processing of personal data are taken (provide specific evidence). 3. If the place or places of business of Unpredictable Computing OÜ (location of the management board, adoption of decisions related to the processing of personal data) are outside the European Union, submit to the Inspectorate the name (contact details) of the representative appointed in the European Union. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 Within the framework of the inquiry, 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 the inquiry to the e-mail address info@unpredictablecomputing.com in the Commercial Register and to the e-mail address info@vindazo.de found on the website www.vindazo.de. With regard to inquiries sent by e-mail, we note that pursuant to clause 27 (2) 3) of the Administrative Procedure Act, a document made or transmitted electronically is deemed to have been delivered if the document or notice is delivered to an e-mail address entered in the company's commercial register. To date, Unpredictable Computing OÜ has not responded to the inquiry of the Inspectorate and has not contacted regarding the extension of the term for responding to the inquiry. The Supervision Authority has given Unpredictable Computing OÜ a

reasonable time to respond, incl. The Inspectorate has thereby fulfilled the obligation arising from subsection 40 (1) of the Administrative Procedure Act to give the participant in the proceeding the opportunity to submit his or her 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. 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 Unpredictable Computing OÜ has not answered the inquiry sent to the Inspectorate on 22.04.2021, the Inspectorate considers that issuing a mandatory precept in this matter is necessary to find out including as soon as possible. If the company has problems in responding to the inspection by the set deadline, the company can explain to the supervisory authority which objective circumstances were the obstacle. However, simply not answering is not acceptable. / digitally signed / Raiko Kaur, lawyer, authorized by the Director General