

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 4 Preceptor Senior Inspector of the Data Protection Inspectorate Raiko Kaur Time and place of precept 14.06.2019, Tallinn Addressee of precept XXXX address: XXXX e-mail address: XXXX 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, I shall issue a mandatory precept: To answer the repeated inquiry sent to the Inspectorate no. 2.3.-3/19/798 on 21.05.2019. I set the deadline for compliance with the precept as 03.07.2019. 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 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. 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. Tatari str. 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 is in the process of supervising the protection of personal data. Within the framework of the state supervision procedure, the Inspectorate submitted an additional inquiry in case no. 2.3.-3/19/798 XXXX on 10.05.2019, the deadline for which was 17.05.2019, and a repeated inquiry on 21.05.2019, the deadline for which was 31.05.2019. 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 the above-mentioned inquiries to XXXX XXXX. It should be noted that XXXX has also responded to previous inquiries on 16.04.2019 and 26.04.2019 and has also received notifications that the Inspectorate may impose a precept and a penalty payment if it is not answered. To date, XXXX has not responded to the repeated inquiry sent by the Inspectorate and has not contacted the administration 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 XXXX has not answered the additional inquiry of the Inspectorate on 10.05.2019 and the repeated inquiry on 21.05.2019, the Inspectorate considers that a mandatory precept is necessary and to eliminate possible disorder. / digitally signed / Raiko Kaur Senior Inspector on behalf of the Director General