

www.aki.ee Registry code 70004235 PRECAUTIONS-WARNING in personal data protection matter no. 2.1.-6/20 Preceptor

Senior Inspector of the Data Protection Inspectorate Maria Muljarova Time and place of precept 27.02.2020, Tallinn Addressee

of the precept Responsible person of the addressee Kroonikeskus OÜ (10691092) Rakvere vald, Näpi alevik, Iirise tn 8, 44305

info@kroonikeskus.ee Elmo Ehrlich, Urmas Sardis members of the board RESOLUTION: IKS) pursuant to § 56 (1), (2) (8), §

58 (1) and Article 58 (2) (f) of the General Data Protection Regulation, the Inspectorate issues a mandatory precept to

liquidate: tn 6, Võru) in the toilets. We set the deadline for compliance with the precept as 09.03.2020. 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 the

precept is not complied with by the specified deadline, the Data Protection Inspectorate shall impose a penalty payment of

6,000 euros on each 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 CIRCUMSTANCES: The Data Protection

Inspectorate initiated an own-initiative supervision procedure, the purpose of which is to find out on what legal basis and

purpose OÜ Kroonikeskus uses the monitoring equipment of Kagukeskus (Kooli tn 6, Võru) and Kroonikeskus (Ferdinand

Gustav Adoffi 11, Rakvere) toilets. On 20.11.2019, we forwarded an inquiry to Kroonikeskus OÜ regarding the protection of

personal data, setting the deadline for replying on 02.12.2019, to which Kroonikeskus OÜ did not respond. We also forwarded

a repeated inquiry on 06.12.2019, setting the deadline for replying on 17.12.2019, to which no reply was also sent. As part of

the repeated inquiry, the Inspectorate also drew attention to the possibility of imposing a precept and a penalty payment. With

regard to inquiries sent by e-mail, it should be noted that a document made available or transmitted electronically pursuant to §

27 (2) 3) of the Administrative Procedure Act is deemed to have been served if the document or notice is sent to an e-mail address entered in the company's commercial register. to the address info@kroonikeskus.ee. GROUND FOR THE DATA PROTECTION INSPECTORATE: On 25 February 2020, the Data Protection Inspectorate carried out an inspection visit to the toilets of the Kroonikeskus (Ferdinand Gustav Adoffi 11, Rakvere), recording the locations of the cameras. The on-site inspection revealed that, in addition to the fact that the first toilet cubicle of the women's toilet is in the field of view of one of the cameras, the procedure for notifying the monitoring equipment on the outside door of the toilet has been violated. Pursuant to § 56 (1), (2) (8) and § 58 (1) of the IKS and Article 58 (2) (f) of the General Regulation on the Protection of Personal Data, the Data Protection Inspectorate has the right to impose a temporary or permanent restriction on the processing of personal data. Taking into account the factual circumstances and the fact that Kroonikeskus OÜ has not submitted relevant explanations and documents to the Data Protection Inspectorate for several months, also taking into account the position of the European Data Protection Board regarding the), the Inspectorate considers that the issuance of a mandatory precept in the matter is necessary to eliminate the disorder. / digitally signed / Maria Muljarova Senior Inspector on behalf of the Director-General

1Computer: https://edpb.europa.eu/sites/edpb/files/consultation/edpb_guidelines_201903_videosurveillance.pdf files / documents / [cameras_instructions_01.07.2016.pdf](#)