

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 Preceptor Senior Inspector of the Data Protection Inspectorate Raiko Kaur Time and place of precept 08.05.2020, Tallinn Addressee of the precept Bolt Technology OÜ (12417834) notices@bolt.eu privacy@bolt.eu Responsible person of the addressee Member of the Management Board 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 Article 58 (1) (e) of the General Regulation, we issue a mandatory precept: To respond to the repeated inquiry sent to Bolt Technology OÜ We set the deadline for compliance with the precept as 22.05.2020. 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 FINANCE WARNING: If the precept is not complied with by the specified deadline, the Data Protection Inspectorate shall impose a precept 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 Penalty 2000 euros. 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. FACTS: A complaint lodged through the cross-border IMI system revealed that the data protection conditions for a service provided under Bolt's name in different countries were not available in the official language of that country, so that consumers in that country could not easily obtain an overview of the data processing. Bolt Technology OÜ sent a reply to the Inspectorate on 20.12.2019, acknowledging that the data protection conditions are indeed not available in all languages and stating that: "Our goal is to translate and publish the

data protection policies of all countries in the first quarter of 2020". In connection with this, the Inspectorate sent an additional inquiry to Bolt Technology OÜ in case no. 2.1.-1/18/3275 on 21.01.2020, the deadline for which was 31.03.2020, and a repeated inquiry on 03.04.2020, the deadline for which was 15.04.2020. The purpose of the inquiries was to obtain confirmation as to whether the data protection conditions of all countries have been translated and published during the first quarter, as promised by Bolt Technology OÜ itself. 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 inquiries to the e-mail addresses provided in the Commercial Register, ie to the address of the inquiry sent on 21.01.2020 to privacy@taxify.eu and to the address of the repeated inquiry sent on 03.04.2020 to privacy@bolt.eu. 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 available 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, the representative of Bolt Technology 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 Inspectorate has given Bolt Technology OÜ a reasonable time to respond. 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.

GROUPS 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. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 Taking into account the factual circumstances and the fact that answering an inquiry made within the supervision procedure of an administrative authority is mandatory, but Bolt Technology OÜ has not been inspected 21.01.2020 the Inspectorate finds that the issuance of a mandatory precept in the matter is necessary to ascertain the essential circumstances of the supervision matter. Deficiencies in data processing cannot be resolved by failing to respond to the Inspectorate. If the company has problems translating the terms by the allowed deadline, the company will be able to respond to the supervisory authority and explain which objective circumstances were an obstacle. However, simply not answering is not acceptable. All the more so as in this case the response does not require a special time, because in essence it is only necessary to inform the Inspectorate whether the conditions have been translated. / digitally signed / Raiko Kaur Senior Inspector on behalf of the Director General