

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.-6/21/25 Preceptor Raiko Kaur Time and place of precept 05.10.2021, Tallinn Addressees of the precept Bolt Technology OÜ (12417834) privacy@bolt.eu notices@bolt.eu Persons responsible for the addressees Member of the Management Board 1.

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, the Data Protection Inspectorate shall issue a mandatory precept to Bolt Technology OÜ to comply with: -1/21/1931. 2. Explain in detail the reason for the failure of the Inspectorate to respond to the proposal specified in clause 1 within the time limit. We set the deadline for compliance with the precepts as 19.10.2021. 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: Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 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 CIRCUMSTANCES: The Data Protection Inspectorate (Inspectorate) received an application according to which the Worker Info Exchange (WIE) has submitted an application as a representative of data subjects, to which Bolt Technology OÜ has not responded correctly. Based on the above, the Supervision Authority initiated an own-initiative supervision procedure on the basis of clause 56 (3) 8) of the

Personal Data Protection Act. As Bolt Technology OÜ did not provide clear answers to WIE, the Inspectorate sent a proposal to Bolt Technology OÜ in case number 2.1.-1/21/1931 in the course of the supervision procedure on 03.09.2021, the deadline for replying to which was 17.09.2021. In this proposal, the Inspectorate stated the following: On 09.08.2021, you provided the Inspectorate with a number of arguments that data will not be released to the Worker Information Exchange (WIE). In doing so, you want the inspectorate to assess and confirm that the WIE's complaint will be treated as a complaint by the relevant representative organization under Article 80 of the CISA. We explain that the Inspectorate initiated an own-initiative supervision procedure, which is why the Inspectorate has not checked the compliance with Article 80 of the CISA and does not consider it necessary at this stage of the procedure. We emphasize that the controller of personal data has the obligation to assess whether and to what extent personal data must be disclosed to the data subject or his or her representative. In the specific case, however, the request has not been clearly answered and there is no justification for not disclosing the data. If Bolt Technology OÜ finds that the WIE has not sufficiently proved the existence of the right of representation of the data subjects, this must also be clearly notified to the WIE. Based on the above, we make the following suggestions: 1. Reply to the WIE immediately and provide the requested information or send the WIE a clear justification for rejecting the WIE's application. 2. Send a confirmation to the Inspectorate whether the WIE's request has been granted or refused. Fill in the inspection proposal no later than 17.09.2021. Pursuant to subsection 40 (1) of the Administrative Procedure Act, you also have the right to submit your opinion and objections to the Data Protection Inspectorate. Pursuant to § 56 (2) 8), § 58 (1) of the APA and

Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry Code 70004235 The Data Protection Inspectorate has the right to a precept if the processor of personal data has violated the requirements for the processing of personal data. In the event of non-compliance with the precept, a penalty payment of up to EUR 20,000,000 or, in the case of an undertaking, up to 4 per cent of the total annual worldwide turnover of the preceding financial year, whichever is greater, may be levied for each breach of the precept. In the proposal, the Inspectorate also drew attention to the imposition of a precept and a penalty payment. The Inspectorate sent the proposal to the e-mail addresses notices@bolt.eu and privacy@bolt.eu provided in the Commercial Register. Bolt Technology OÜ has also previously received letters from the Inspectorate from these e-mail addresses and has also replied to the Inspectorate. With regard to the proposal sent by e-mail, we also 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,

the representative of Bolt Technology OÜ has not responded to the proposal of the Inspectorate and has not contacted regarding the extension of the term for responding to the proposal. The Supervision Authority has given Bolt Technology OÜ a reasonable time to respond, incl. It is also possible for the addressee to write and justify the proposal to the Supervision Authority if the deadline for replying is too short and submitting a response would require a longer response time. 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 it is mandatory to respond to the proposal made within the supervision procedure of the administrative body, but Bolt Technology OÜ has not responded to the proposal sent to the Inspectorate on 03.09.2021, the Inspectorate considers that issuing a mandatory precept in this matter is necessary 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