

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 / Preceptor Raiko Kaur Time and place of precept 11.06.2021, Tallinn Addressee of the precept responsible person AS A&P Mets (10321314) lemeks@lemeks.ee Representative: Law firm Lepmets & Nõges tauri@leno.ee ott@leno.ee Member of the Management Board RESOLUTION: Personal Data Protection Act (IKS) § 56 (1), (2) (8), § 58 (1) and Article 58 (1) (d) and (2) (f) and (g) of the General Regulation on the Protection of Personal Data A&P Mets is required to comply with a mandatory precept: 1. To terminate illegal data processing concerning the acquisition of data (name, personal identification code) of real estate owners from the land register, by owner's name or personal identification code from Internet search engines / telephone directory contacting and / or contacting people in connection with the above. 2. Delete all personal data collected as described in point 1. We set the deadline for compliance with the precept as 28.06.2021. 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 to the Tallinn Administrative Court under the Code of Administrative Court Procedure (in which case the challenge can no longer be heard). Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 Contestation of a precept does not suspend the obligation to comply with the precept or the application of the measures necessary for compliance. PENALTY WARNING: If a precept is not complied with by the specified term, the Data Protection Inspectorate shall impose a penalty payment on the addressee of the precept on the basis of § 60 of the Personal Data Protection Act for each item of the precept not complied with. 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 WARRANTY: Misdemeanor proceedings may be instituted for failure to comply with a precept pursuant to Article 58 (1) of the General Data Protection Regulation on the grounds of § 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: On 12.03.2021, the Data Protection Inspectorate (Inspectorate) received a complaint number 2.1.-1/21/1006, according to which a letter with the following content has been sent to the complainant's e-mail

address on 03.03.2021: I am writing to you from A&P Mets. We are interested in your XXX (xxx) forest property. I will forward my contacts to you if you have an interest in cooperating in the sale of logging rights or real estate. We would be happy to make you a price offer from us. (The offer does not entail any obligations) It should also be mentioned that A&P Mets AS is a company that owns more than 10,000 ha of forest land and the necessary equipment for forest management. You can find more information at www.apmets.ee. Sincerely, XXX Purchasing Specialist A&P Mets AS | Näituse 25, 50409 Tartu, Estonia | www.apmets.ee Phone +372 738 6051 | GSM +372 5308 0356 | xxx. The complaint submitted to the Inspectorate states that the person is not related to the registered immovable and feels that his or her personal data has been incorrectly processed. Based on the above, we initiated the supervision procedure. The complaint also conveyed correspondence, which shows that AS A&P Mets has also responded to the complainant as follows: As a logging company, we keep an eye on Estonian forest properties on a daily basis. All interested parties can make a paid request to the land register (<https://kinnistusraamat.rik.ee/Avaleht.aspx?>) About the real estate of interest, from which the data consisting of the first and last name and personal identification code of the owner of the real estate will be sent. Next, we use public search engines (google.com, phone books, etc.). If the contact can be found (phone number / e-mail, etc.), we have sent the owner a request for interest in the property. The same goes for your property. If the owner responds positively to the inquiry Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235, is interested in either the management or the sale of the real estate, we will proceed with the negotiations for the purchase of the real estate / felling right. All information about you consists of the above-mentioned data (first and last name, personal identification code, e-mail address), which is publicly available and arises from the real estate owned by you and of interest to us as a logging company. The collected data is not disclosed to third parties and is used only internally. With the unsuccessful wording, the colleague has wanted to say that if the owner of the real estate has no interest in the management / sale of the real estate, or the data of public search engines turn out to be incorrect, we will make a note and remove the real estate from the list of objects of interest. As part of the supervision procedure, we sent proposals to AS A&P Mets on 20.04.2021 with the following content: 1. To terminate the processing of personal data if it does not meet at least one of the conditions provided for in Article 6 (1) of the General Data Protection Regulation. 1.1. Sh to terminate data processing concerning the acquisition of data (names) of the owners of the immovable from the land register, searching for numbers / e-mail addresses in the Internet search engines according to the name of the owner and / or calling or writing to people in connection with the above. 2. Delete all personal data collected in points 1 and

1.1. in this way. 3. Send a confirmation to the Inspectorate that the above proposals have been fulfilled. AS A&P Mets did not comply with the proposals of the Inspectorate, but submitted its own opinions. On 19.05.2021, we sent a repeated proposal in which we explained the following: The following is your response to this proposal and the Inspectorate's explanations for your response. 1. AS A&P Mets: The Client does not agree that the processing of personal data is not lawful in this case. Pursuant to Article 6 (1) (a) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter GDPR), the processing of personal data is lawful if the data subject has given his or her consent to the processing of his or her personal data. As an owner or owner of a limited real right, a person shall be entered in a publicly available land register at least together with his or her personal name and personal identification code. The basis for making an entry is generally a notarised contract in rem and the resulting application for entry. In a notarial contract in rem, a person does not (generally) give consent to the disclosure of his or her data in the land register. Thus, a person agrees to an implied declaration of intent for the processing and publication of his or her personal data in the land register and extracts from the relevant part of the register. Otherwise, it may be considered that the authorized processors of the land register and the land registry department maintained by the Tartu County Court and the Center of Registers and Information Systems process and publish personal data without a legal basis. Assuming that the processing of personal data is necessary in the public interest within the meaning of Article 6 (1) (e) GDPR, the same logic would always be lawful in the light of a legitimate interest in the private sector within the meaning of Article 6 (1) (f) GDPR. Of course, this is not the case in the private sector. Notwithstanding the foregoing, pursuant to § 1 (1) of the Land Register Act, a land register is a database the purpose of which is to collect, preserve and disclose information on the creation, transfer and encumbrance of immovable property, as well as transfer, encumbrance, change or termination of immovable property. If a person has consented to the processing of his or her personal data and to making it available to the public on Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 (regardless of the legal basis) for the purpose of disclosing the right of ownership to third parties, a third party to process it, including accessing and searching for information. If you enter a personal name purchased from the land register for a fee into a Google search engine, for example, entering the personal name will often display the person's contact information. The person has disclosed his or her contact details for the purpose of contacting him or her or the information has been published by the public authorities as contact details of the person for the purpose of contacting him or her. In both cases, the data have been published for the purpose of contacting the person. Thus, if you search for the owner of a real estate, for example, on the basis

of public data, it is legal. Otherwise, it would be illegal to extract from the land register. If the owner has been contacted on the basis of the contact details identified and disclosed by the owner himself or herself, the personal data will be processed for the purpose for which the person consented to the disclosure or processing of the data. Otherwise, there would be no legal clarity and certainty, for example, in a situation where persons engaged in forestry, including RMK, must obtain the consent of the owner of a neighboring immovable for access. As the owners of real estate on land for commercial purposes generally do not live on the site, it is necessary to get in separate contact with the owners. For this purpose, the information of the owner of the real estate is purchased from the land register, then public information is searched on the Internet and the owners are contacted. In this case, the client contacted the person in order to get in touch with the person on the basis of the information published by him or her. Consequently, the processing of personal data was lawful.

1.1. Inspectorate: We explain that land register data are public and data, including personal data, are disclosed on the basis of law and not on the basis of consent arising from the IKÜM. However, this does not mean that personal data taken from the land register can be used without a legal basis. According to the case law of the Supreme Court, there must also be a legal basis for the processing of disclosed personal data.¹ Thus, in any case, AS A&P Mets must have a specific legal basis for the processing (incl. Collection, use) of personal data arising from Article 6 (1). The reference to the situation where the public sector is required to process data in the public interest within the meaning of, for example, Article 6 (1) (e) CISA, using the same logic could be used by the private sector under Article 6 (1) (f), is not relevant in this case. First, the complainant is in a situation where his data have been processed in a situation where he was not in fact the owner of the property. On the other hand, in the present case it is not possible to confine oneself narrowly to the processing of land register data, but the data processing operations must be considered more broadly. In other words, the legal basis for processing the data should cover the entire business practice of AS A&P Mets, ie: and surname and personal identification number. Next, we use public search engines (google.com, phone books, etc.). If the contact can be found (phone number / e-mail, etc.), we have sent the owner a request for interest in the property.

1.2. However, with regard to the examples you have given, we note that each data controller is obliged to prove to both the individual and, if necessary, to the Inspectorate whether and on what legal basis the data processing takes place under Article 6 (1) of the CISA. If the processor fails to demonstrate, inter alia, that the processing of personal data is lawful, fair and transparent to the data subject (see Article 5 (1) (a) and (2) of the CISA), further processing is also prohibited. In the specific case, it remains unclear whether and on what legal basis AS A&P Mets processes the data and whether and how all

the requirements arising from the IKÜM are met. 1 RKT decision of 18.02.2015 in case no. 3-2-1-159-14, clause 14; see also the decision of the ICC of 12 June 2012 in case no. 3-3-1-3-12, clause 23. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 1.3. In this case, a distinction must also be made between calling and sending an e-mail to make an initial sale offer. In a situation where the offer is sent by e-mail, AS A&P Mets OÜ is obliged to follow the requirements of the Electronic Communications Act (ESS) when receiving direct sales. We note here that the use of electronic contact data of a natural person for direct marketing is permitted only with the prior consent of the person (see § 1031 (1) of the ESA). Thus, in a situation where AS A&P Mets sends a letter to a person's e-mail address regarding the offer of a registered immovable, this is possible only in a situation where prior consent has been obtained from the person in accordance with Article 7 of the CISA. However, in the specific case, it is not possible to obtain / give consent before making the initial offer, taking into account that AS A&P Mets collects data from various sources and makes bids on the basis of the collected data. However, since the ESS does not regulate the transmission of direct sales by telephone, in a situation where the names of the owners of a real estate are searched (purchased) indiscriminately (eg from the land register), the person's possible telephone number is then searched rely solely on Article 6 (1) (f) of the CISA, that is to say, a legitimate interest. However, it must be borne in mind that Article 6 (1) (f) of the CISA must take into account, inter alia, the legal relationship (eg contractual relationship) between the processor and the data subject and the person's reasonable expectation that his or her personal data may be processed for a specific purpose. If AS A&P Mets has no legal relationship with the data subjects and the data subjects cannot reasonably assume that their data could be used in connection with the sale offers of the immovable, the Supervision Authority does not see that the legal basis for processing personal data can be Article 6 (1) (f). If the data subject's data is disclosed on the basis of law (eg in the land register) and the person and / or a third party has added their contact details to the Internet or can be found in a telephone directory and AS A&P Mets collects them and calls in connection with the real estate offer, the inspection where the data subject could reasonably be expected to be contacted for that purpose. If such a situation were permissible, it should also be taken into account that, in principle, all persons could collect the data of all people and start making all kinds of sales offers on the basis of this data - however, such an approach is not tolerable according to the Inspectorate. However, there could be a legitimate interest in making sales offers in a situation where a person publishes his or her contact information on a website, for example, and states that he or she wishes to sell a specific property. In addition to the above, it must be borne in mind that, regardless of the legal basis, the processing of personal data

must also comply fully with the principles set out in Article 5 (1) of the CISA, including points (a) and (d). The principle of transparency presupposes that all information and messages related to the processing of personal data are easily accessible, comprehensible and clearly worded. In other words, data protection conditions must be in place. The content of the data protection conditions is regulated by Articles 12 - 14 of the CISA. According to the materials of the case, AS A&P Mets does not collect personal data from the data subject itself, therefore In doing so, the person must be provided with information on, inter alia, who is the controller of the personal data, on what legal basis the personal data is processed, what types of personal data are collected (eg name, telephone number, e-mail address, real estate data) and sources of personal data. The data processor is also obliged to provide the data subjects with the information provided for in Article 14 of the CCP without prior contact of the person and within a reasonable time after receiving the personal data, but not later than within one month or if the data subject is used Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 for notification, then at the latest at the time of the first notification of the relevant data subject (see Article 14 (3) of the CCIP). In other words, AS A&P Mets must inform people about the processing of personal data no later than within one month of receiving the data, or if the person is called / written earlier, he or she must be informed of the information provided in Article 14 (1) and (2) of the ICC at the time of first contact. However, AS A&P Mets has not fulfilled this obligation. In addition, the materials of the case also show that the personal data being processed is not correct, ie an offer of a registered immovable is made to a person who does not own a specific registered immovable. The processing (including collection and use) of data in this way is also prohibited (see Article 5 (1) (d) of the CCIP). Thus, as mentioned earlier, in a situation where there is no legal basis for the processing of personal data or the processing of personal data does not comply with the principles of processing personal data, further processing of personal data is also prohibited. Therefore, in a situation where AS A&P Mets continues to process personal data in this way, in addition to the analysis of the legal basis (legitimate interest), the data protection conditions, information on whether and how people are informed about the existence of data protection conditions and thorough explanations that the offer to sell is made to the right person and not to a person not related to the property (eg a namesake).

2. AS A&P Mets: If it is found that the processing of personal data was not lawful in this case (which the client does not agree with), then according to the Ministry of Justice, companies can re-use public information for some other commercial purpose than the original purpose. In this case, the processing of personal data was also entered in the economic interest of the owner of the real estate, the data was publicly available and the person was interested in the price offer of the

real estate. Namely, in the e-mails of 03.03.2021, the person asked the customer to prepare price offers. In conclusion, the re-use of the data was therefore lawful on the basis of the legitimate interest of the customer. However, if the person requesting the quote was not in fact the owner of the property in question and the e-mail was sent in error, the person did not publish it despite repeated questions from the customer. Understandably, in this case, the customer would have stopped processing the data immediately and permanently deleted the data. Consequently, the processing of personal data was lawful.

2.1. Inspectorate: We explain that the Inspectorate does not rule out the possibility that companies may re-use public information (personal data), but it must still have a legal basis arising from Article 6 (1) (f) of the CCIP. The same position is supported by the Ministry of Justice, which sent the following explanation to the Inspectorate in May this year: If the open data and thus the reusable information is personal data, the re-user is in no way exempted from the requirements of the General Personal Data Protection Regulation. Such an exclusion does not follow from either the AVTS or the General Data Protection Regulation. We also explain that a data processor is not prohibited from making a price offer in a situation where a person wishes a price offer himself or herself. In this case, the problem is not in making a price offer, but in how the requirements of the IKÜM and ESS were met and are being met in a situation where data is collected from the land register, the internet / telephone book and used to make sales offers. 3. AS A&P Mets: If you do not agree with the above-mentioned views of the client, the client asks you to substantiate your views with legal certainty and refute the views of the client. In the light of additional justifications, the client re-evaluates his / her perceptions and approaches. The purpose of this position is not to unreasonably dispute your views, but to find out the practical vision of the Data Protection Inspectorate and its background. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 Otherwise, the Client does not consider it necessary or expedient to consider all the claims submitted by you or their legal grounds, but emphasizes that it does not take into account the allegations or legal justifications to any extent within the meaning of § 231 (4) of the CCP. The customer asks you to forward your further views to the customer's contractual representatives by writing to ott@leno.ee and tauri@leno.ee. 3.1. Supervision: We draw your attention to the fact that the controller of personal data has the obligation to prove, among other things, that the processing of personal data is lawful, fair and transparent to the data subject and that the personal data collected is correct (see Article 5 (2)). If AS A&P Mets fails to prove to the Supervision Authority that there is a legal basis for further processing of personal data pursuant to Article 6 (1) of the CISA and that the processing of personal data complies with the principles of Articles 5, 12 and 14 of the CISA, further processing of personal data is prohibited. We

emphasize that the processing of the complainant's personal data has been illegal, given that AS A&P Mets has not complied with the above requirements. Based on the above, on 19.05.2021 we made the following proposals: 1. To stop sending direct sales offers (offers for the sale of real estate) to the electronic contact details (including e-mail addresses) of natural persons without the prior consent of the person (ESA § 1031 (1)). 2. Terminate the processing of personal data if it does not meet at least one of the conditions set out in Article 6 (1) of the General Regulation on the protection of personal data. 2.1. Sh to terminate data processing concerning the acquisition of data (names) of the owners of the immovable from the land register, searching for contact information from Internet search engines / telephone directories by the name of the owner and / or contacting people in connection with the above. 3. Delete all personal data collected as specified in points 2 and 2.1. 4. Send a confirmation to the Inspectorate that the above proposals have been met. Respond to the repeated proposal immediately, but no later than 31.05.2021. If you do not agree with the proposal (s), AS A&P Mets must prove to the Supervision Authority the following in accordance with Article 5 (2) of the CISA: 2 1) The processing of personal data is lawful and fair (Article 5 (1) (a) of the CISA) the processing of personal data must have a specific legal basis under Article 6 (1) of the CISA. If the legal basis is Article 6 (1) (f) of the CCIP, a thorough analysis of legitimate interests must be submitted to the Supervision Authority, which would show that AS A&P Mets has a legitimate interest in indiscriminately searching (purchasing) the names of real estate owners the person's possible telephone number and / or e-mail address (eg using Internet search engines) and call the person in connection with the property. It must also be substantiated how the legitimate interests of AS A&P Mets outweigh the interests of the data subject. If the data subject cannot reasonably foresee the processing of his or her personal data, ie AS A&P Mets has no legal relationship with the data subjects (contractual relationship) and the data subject has not expressed a wish to receive sales offers, this must be taken into account when preparing the analysis. Regarding the preparation of the analysis of legitimate interests, we also recommend reading the guidelines on legitimate interests prepared by the Inspectorate. 2) The processing of personal data is transparent to the data subject (Article 5 (1) (a) of the CISA) 2 Legal basis for requesting clarifications: in the case of non-administrative persons § 30 (1) and (3) in the case of an administrative authority pursuant to § 752 (1) 1) of the Government of the Republic Act. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 easily accessible, comprehensible and clearly worded. In other words, data protection conditions must be in place. The content of the data protection conditions is regulated by Articles 12 - 14 of the CISA. According to the case file, AS A&P Mets does not collect personal data from the data subject within a reasonable time after

receipt of the personal data, but no later than one month or, if the personal data are used to inform the data subject, at the latest at the time of the first notification to the data subject concerned (see Article 14 (3) CISA). Based on the above, AS A&P Mets must prepare data protection conditions that fully comply with the requirements set out in Articles 12 and 14 of the CISA. AS A&P Mets must also inform people about the processing of their personal data no later than within one month of receiving the data, or if the person is called / written earlier, the person must be informed of the information provided for in Article 14 (1) and (2) of the CISA at the time of first contact. In the light of the above, submit to the Inspectorate data protection conditions that comply with the requirements set out in Article 14 (1) and (2) of the CCIP. Also explain in detail how AS A&P Mets correctly complies with the requirement to inform people. 3) The personal data collected is correct (Article 5 (1) (d) of the CCIP) search or telephone directory, it is not possible for AS A&P Mets to be convinced that the personal data being processed is correct. However, in a situation where personal data is incorrect, the processing (including collection and use) of personal data is prohibited. Submit specific explanations to the Inspectorate, which would show whether and how AS A&P Mets will further ensure that the personal data processed is correct, ie the person to whom the call is made and / or written is in fact the person who owns the object that is the subject of the offer. Pursuant to § 40 (1) of the Administrative Procedure Act, you have the right to submit your opinion and objections on the matter to the Data Protection Inspectorate. the processor of personal data has violated the requirements for the processing of personal data protection. 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. We also note that the Inspectorate has the right to impose a temporary or permanent restriction on the processing of personal data, including a ban on processing, in accordance with Article 58 (2) (f) of the CISA. In a situation where AS A&P Mets is unable to prove the fulfillment of the obligations provided for in the IKÜM on 31 May 2021, the Supervision Authority is forced to establish a restriction on the processing of personal data until the processing of personal data has been brought into compliance with the requirements set out in the IKÜM. On 31 May 2021, a representative of AS A&P Mets sent a reply to the Inspectorate stating the following: 1. On 19 May 2021, you made a repeated proposal to the Customer to better comply with the Personal Data Protection Act, according to which (i) (including e-mail addresses) without the prior consent of the person, (ii) terminate the processing of personal data if it does not meet at least one of the conditions set out in Article 6 (1) of the General Data Protection Regulation. Including the termination of data processing concerning the acquisition of data (names) of real estate

owners from the land register, searching for contact information from Internet search engines / telephone directories by name and / or contacting people in connection with the above, (iii) delete Tatari tn 39/10134 Tallinn / 627 4135 / info @ aki. ee / www.aki.ee Registry code 70004235 all personal data collected in the above-mentioned manner and (iv) send a confirmation to the Supervision Authority that the above proposals have been complied with. 2. Pursuant to the precept, if the Client does not agree with the proposals, the Client must prove to the Inspectorate in the light of Article 5 (2) of the CISA that (i) the processing of personal data is lawful and fair; analysis, (ii) the processing of personal data by the data subject is transparent and the data protection conditions are also submitted to the Supervision Authority, and (iii) the collected personal data are correct and provide the Supervision Authority with specific explanations showing whether and how the Client ensures is actually the person who owns the property that is the subject of the offer. 3. The customer agrees with the first proposal of the Supervision Authority and terminates the sending of direct sales offers to the electronic contact details of natural persons without the prior consent of the person. The Client hereby confirms the further execution of the proposal and reorganizes the economic activities. 4. The Client does not agree with the other proposals mentioned above and submits to the Supervision Authority the data protection conditions and analysis of legitimate interests, which are an integral part of this opinion. If, as a result of the co-operation between the Inspectorate and the Client, the parties find that the specified documents need to be supplemented, the Client considers it possible to make changes. EXPLANATION OF THE PERSONAL DATA PROCESSOR 5. With regard to the processing of correct personal data, the Customer explains the following. The name of the owner of the registered immovable and his or her personal identification code are shown in Section II of the extract purchased for the registered immovable. If the real estate is of interest to the Client even after reviewing the statement purchased for the real estate and the Client uses the public Google search engine to search for the contact number of the real estate owner, the Client will contact the person if there is sufficient legitimate interest. the date of birth is assimilated to publicly available data or the processing of accurate personal data is based on another method that has been established in advance. 6. In addition, the Client considers it necessary to emphasize that the processing of false personal data in the light of the name of the case has not occurred in the Client's previous economic activities that have lasted for decades. Secondly, it appears from the correspondence between the parties that the Client repeatedly asked whether the person was still the owner of a specific immovable and promised to terminate the data processing immediately. Unfortunately, the data subject did not answer the Customer's relevant questions or ask to terminate the data processing. If the data subject had said upon the Client's request

that he or she is not in fact the owner of a specific real estate, then the Client would have terminated the data processing immediately. The Client also asks for the position of the Supervision Authority regarding the matters mentioned in the last paragraph of the analysis of legitimate interests. In addition, on 31 May 2021, a representative of AS A&P Mets forwarded to the Inspectorate the data protection conditions and the analysis of legitimate interest. GROUND FOR THE DATA

PROTECTION INSPECTORATE: 1. Processing of personal data Personal data is any information about an identified or identifiable natural person. An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identity number, contact details (see Article 4 (1) of the CISA). Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 As can be seen from the materials of case number 2.1.-1/21/1006, one real estate of which the owner name of the performer) they bought through the website

<https://kinnistusraamat.rik.ee>. The complainant's contact details were then searched using an internet search engine to contact him. Thus, the complainant was contacted in a specific case and, in addition to the contact details, the name of the person and the property belonging to him were also known, ie AS A&P Mets processed personal data. 2. Legal basis for the processing of personal data: legitimate interest The processing of personal data is lawful only if at least one of the conditions set out in Article 6 (1) of the General Regulation on the Protection of Personal Data (EDPS) is fulfilled. AS A&P Mets finds that AS A&P has Legitimate interest under Article 6 (1) (f) of the. According to Article 6 (1) (f) CISA, the processing of personal data is lawful if the processing is necessary in the legitimate interest of the controller or of a third party, unless such interests outweigh the interests or fundamental rights and freedoms for which the personal data must be protected. (Article 6 (1) (f) of the CCIP).

Thus, Article 6 (1) (f) of the CISA lays down three conditions, all of which must be satisfied in order for the processing of personal data to be authorized: - the controller or third parties have a legitimate interest in the processing; - the processing of personal data is necessary for the pursuit of a legitimate interest; - the legitimate interests of the controller and / or a third party outweigh the interests, fundamental rights and freedoms of the data subject being protected; The possibility of using this legal basis and its assessment can be divided into three stages, ie firstly the legitimate interests and weight of the data controller or third parties, secondly the rights and interests of the data subject and thirdly the consideration of conflicting interests, including preliminary assessment + additional safeguards and final assessment. In the light of the above, the controller has an obligation to weigh the legitimate interests of himself and / or the third party against the interests and fundamental rights of the data subject, as a result of which Article 6 (1) (f) CISA can be invoked as a legal basis for processing. The fact that the processor

has a legitimate interest in the processing of personal data does not automatically mean that the processor can rely on Article 6 (1) (f) of the CCIP. The legitimacy of the controller's interest is only a starting point, ie one of the elements to be analyzed, and whether the basis of a legitimate interest can be relied on depends on the outcome of the balancing act. It is for the controller to ascertain whether the legitimate interest provision can be relied on, who must carry out the weighing in a transparent manner and be able to justify it. Thus, in order to understand whether personal data can be processed on the basis of Article 6 (1) (f) of the CCIP, AS A&P Mets must prove whether and what is the legitimate interest of the company. Legitimate interests must be sufficiently clear. This requires a real and present interest - something related to an ongoing activity or a benefit that is expected to accrue in the near future. In other words, interests that are too vague or speculative are not enough. If legitimate interests are not sufficiently clear, these interests cannot be balanced against the interests and fundamental rights of the data subject. It is therefore important that the legitimate interest is in accordance with the applicable law, is sufficiently clear (ie sufficiently specific) and real and current (ie not speculative). Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 Secondly, it is necessary to analyze the possible interests or fundamental rights and freedoms of the data subject that may be harmed by the processing of personal data. Third, the legitimate interests of AS A&P Mets must be balanced with the interests and fundamental rights of the data subject. The impact on the processing of personal data (collection, use, storage) may be compared with the legitimate interests of the controller and it is assessed whether and to what extent the legitimate interests of the controller outweigh the interests of the data subject. If the data controller fails to perform one of the previous steps correctly, the processing of data is not permitted under Article 6 (1) (f) of the CISA and the Inspectorate has the right to prohibit further processing of personal data. The Inspectorate shall verify the compliance of Article 6 (1) (f) of the CCCTB, taking into account the above and the explanations provided in the repeated proposal sent on 19.05.2021.

2.1. Analysis of the legitimate interest of AS A&P Mets

2.1.1. Necessity of processing personal data of AS A&P Mets in case of legitimate interest

In the analysis of legitimate interest submitted to the Supervision Authority, AS A&P Mets has stated the following in terms of legitimate interest and necessity: Therefore, in order to ensure the stable economic activity of the Company, there is also an interest in marketing and recall activities. As a rule, natural persons first turn to the Company themselves, asking for a quote or receiving assistance in forest management. In some cases, either in the case of a property of special interest, or where a forest property needs rapid management and maintenance in order to preserve its value, the Company first processes personal data in order to contact the owner, clarify the forest management situation and make an

offer if appropriate. This gives the Company an opportunity to realize its interests. If the volume, scope or manner of the Company's activities were to cease, the Company's decades-long operations would also cease and approximately 40 employees would lose their stable jobs. Consequently, the interests of the Company are justified and overriding. The Data Protection Inspectorate agrees that the legitimate interest of AS A&P Mets in the processing (collection, use) of data can arise from the company's business interest. However, we explain that the Inspectorate does not prohibit a company from carrying out marketing and advertising activities, but if it is desired to do so through the processing of personal data, the requirements set out in the IKÜM must also be taken into account. However, it is not clear from the statements submitted to the Inspectorate whether and what role calling on the basis of a legitimate interest to real estate owners actually plays in the company's business - no factual facts are present in the submitted analysis. , how much of the turnover comes from such calls, etc.). In addition, the legitimate interest analysis indicates that the company has around 40 employees and that in a situation where the volume, scope or manner of activities would cease, around 40 employees would lose their stable jobs. At the same time, the following is stated: As a rule, natural persons first turn to the Company themselves, asking for a quote or receiving assistance in forest management. In some cases, either in respect of a property of special interest, or where a forest property requires rapid management and maintenance in order to maintain its value, the Company itself processes primary personal data in order to contact the owner, clarify the forest management situation and make an offer if appropriate. At the same time, it is not clear to the Inspectorate whether all 40 employees are still actively searching for and contacting the data of property owners, and in a situation where such marketing and advertising activities are not carried out, the activities of the company will also disappear. At the same time, it has been pointed out in the analysis of legitimate interest that, as a rule, natural persons contact the company Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 themselves. In view of the above, the Supervision Authority does not understand whether and to what extent AS A&P Mets has such processing of personal data that searches (buys) the names and personal identification codes of the property owners (from the land register), then searches for a possible telephone number (eg using Internet search engines) actually necessary for the pursuit of a legitimate interest of the undertaking. 2.1.2. Interests or fundamental rights of the data subject - and freedoms

Regarding the rights and interests of the data subject, AS A&P Mets has stated, inter alia, the following: . In addition to the specific adverse effects, the wider emotional impact must also be taken into account. If the Company contacts a person in the light of the above interests, then in the economic activity after the preparation of the Analysis, the Company will always contact

the owner of the real estate by telephone first. If the person and his or her contact number cannot be determined with certainty, the Company will not contact the person, including by e-mail. Thus, the wider negative consequence may, in the worst case, be limited to unpleasant telephone calls. The telephone conversation lasts as long as the data subject so requests. Generally, a person is interested and, after a few minutes of a telephone call, asks to make a price offer or to explain the Company's observations by e-mail. If the person is not interested in forest management, the phone call will last up to a few seconds. Generally, thank you for your pertinent comments and interest in making a quote. Only on a few occasions, in the Company's decades-long economic activity, has the data subject expressed inconvenience in a telephone call. In this case, the Company has apologized to the data subject for the inconvenience and is convinced not to contact the owner of the specific property again. Consequently, in theory, the data subject may have minimal non-specific negative consequences. The Data Protection Inspectorate agrees that the main violation of a person's rights may occur at the moment when the person is called. This is because it is the first moment a person can know at all that their personal data is being processed. However, it must also be taken into account that in this case the rights of people are already violated by collecting data, ie people cannot foresee that AS A&P Mets will collect its personal data and what data and from which sources will be collected. Although AS A&P Mets points out that it is generally thanked for the relevant observations and the desire to make a price offer, and only a few times the data subject has expressed inconvenience in a telephone call. People often do not understand why they are being called and from what sources they have been contacted. We have also issued a precept to one company that has used similar business practices this year to stop the illegal processing of personal data. AS A&P Mets also stated the following: If data processing leads to a transaction as a result of communication, the main positive consequence for the person is financial income. Financial income is generally used for purposes other than and more than decades of forestry. At the same time, significant costs are saved to maintain the value of the forest. In addition to financial income and cost savings, the persons themselves have also seen as a positive result a situation where the person who manages the forest on a daily basis, in the form of the Company, makes more informed decisions in forest management than the persons themselves would participate. For example, a drainage ditch is dug on the property, the felling is expected until the forest is fully mature or the neighboring forest is reforested in a natural way. In other words, in addition to the direct positive effect in terms of financial income, individuals also have a wider emotional impact as peace of mind. Even if the parties do not reach a transaction, the data subjects have valued (i) the Company's significant observations regarding the preservation or protection of the value of the

forest; (ii) the price offer made by the Company at Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235, because the persons know the estimated value of their forest immovable, logging right, etc. without incurring additional expenses; (iii) Forest management recommendations made by the Company for future reference. Consequently, the person has both direct and indirect positive consequences for the implementation of the measure. The Supervision Authority agrees that those with whom a transaction is reached are often satisfied, given that they receive financial income. However, the statement that financial income is generally used for other and more profitable purposes remains unclear. This raises the question of whether AS A&P Mets will also investigate from the parties to the transaction what will be done with the received income. We note that a person can do anything with the money received, ie in the opinion of the Inspectorate, it is not possible to state without specific evidence that the financial income received is generally used for more profitable purposes. 2.1.3.

Balancing the legitimate interests of AS A&P Mets and the interests, fundamental rights and freedoms of data subjects AS A&P Mets has found the following, among other things: As indicated at the beginning of the Analysis, the Company uses If, after reviewing the information, the Company's interest in the property is maintained, the Company will use the public Google search engine to search for the contact information of the property owner in the form of a telephone number. If it is not publicly available, the Company will not take any further action or seek further contact. If the contact details of the owner of the registered immovable can be found, the person has generally disclosed his or her contact details in one or another environment for the purpose of contacting the person. In other cases, contact information has been disclosed by the Republic of Estonia through its institutions or public entities. If the Company finds the contact telephone number of the owner of the property, the person will be contacted and, if appropriate, a mutually satisfactory result will be reached. If the person does not want the transaction or asks not to contact him, the Company will permanently delete the person's contact number. The Supervision Authority agrees that in a situation where a third party has justifiably or the person has made his or her contact information available in a specific Internet environment, one of the purposes is to be able to contact the person. However, the context of the specific environment must be taken into account here, ie in which environment and for what purpose the contact details have been disclosed. For example, in a situation where the contact information of a member of the management board has been disclosed in the Internet environment, this information is intended for use in situations where it is desired to communicate with a representative of the company and not with a private individual. Similarly, in a situation where the contact details are published on a job search portal, car sales portal, these contact details may be used for this purpose, ie the contact

details published on the job search portal are for communication on job vacancies and the car sales portal is for contacting a car. However, the Inspectorate cannot in any way accept that the contact details of a person are in any Internet environment, this justifies calling a natural person in connection with any service / goods. The Supervision Authority is of the opinion that in a situation where a person's data is disclosed on the basis of law (eg in the land register) and the person and / or a third party has added his or her contact details on the Internet or can be found in a telephone directory, the person cannot reasonably expect that he may be contacted for any purpose. If such a situation were permissible, it should also be taken into account that, in principle, all persons could collect the data of all people and start making all kinds of sales offers on the basis of this data - however, such an approach is not tolerable according to the Inspectorate. However, AS A&P Mets could have a legitimate interest in making an offer to sell, for example, in a situation where a person discloses his or her contact information in connection with a specific real estate on a real estate sales portal and states that he or she wishes to sell a specific real estate. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 In addition, AS A&P Mets has stated the following regarding the balancing of rights: The measure used is suitable because it helps to contact the person. The measure used is necessary because the goal, ie to contact the owner of a specific immovable, cannot be achieved by another measure that is less burdensome for the person. It must be taken into account that if the implementation of a measure should have a negative consequence, it will last for a moment. In general, the application of the measure ends successfully for the parties and the data subject receives a lasting positive result. The measure used is moderate, because considering the importance of the interests of the data subject and the extent of the infringement of rights, on the one hand, and the purpose of the processing, on the other hand, the implementation of the measure outweighs the possible infringement. The implementation of this measure may infringe the rights of some data subjects, but the duration and scope of the implementation of the measure is minimal and the positive consequences obtained by the data subject outweigh the minimal and rare negative consequences. Social expectations must also be taken into account. According to the company's business practice, the owners of real estate value the information obtained through contact even in a situation where the final transaction is not reached. Based on the positive experience, the owner of the property talks about the situation to his acquaintance, who are already calling the Company themselves. The company values sustainable and best practice forest management and has not refused to share information for free so far. It must also be taken into account that the Company processes only ordinary types of personal data that have already been disclosed in one or another environment by the person

himself or herself or the Republic of Estonia for the purpose of contacting the person. First of all, we explain that AS A&P Mets has stated in its reply that calling a person is like a separate goal. We explain that in the sense of IKÜM, the goal is certainly not to call a person, but to make it possible to enter into a transaction with a person and thereby earn the company's business interests. Therefore, the sentence remains incomprehensible: The measure used is necessary because the goal, ie to contact the owner of a specific immovable, cannot be achieved by another measure that is less burdensome for the person. Similarly, the analysis of legitimate interests has previously stated that the purpose is still marketing and advertising and the realization of a company's commercial interests. At the same time, actively searching for a person's contact information and calling them without the person's recommendation is not the only possible way to achieve the desired goal. There are a number of different ways to carry out marketing and advertising activities, including advertising on the Internet, on television, on the radio, using billboards installed in urban areas, etc. All these possibilities are much less burdensome than a person's rights in order to achieve the goal, and people can contact themselves if they wish. It should be noted that the analysis of legitimate interest also shows that, in general, people contact the company themselves and only in some cases do they contact the property owner first. In view of the above, it is also not possible to understand from the analysis of the submitted legitimate interest whether and why the processing of personal data is necessary for the fulfillment of the desired purpose and why it is not sufficient to use other measures that less infringe human rights. In addition, the Inspectorate does not agree that a possible negative consequence for a person lasts only momentarily. We also emphasize the above: The Data Protection Inspectorate agrees that the main violation of a person's rights may occur at the moment the person is called. This is because it is the first moment a person can know at all that their personal data is being processed. However, it must also be taken into account that in this case people's rights are already violated by collecting data, ie people cannot foresee that AS A&P Mets collects its personal data and what data is collected (incl. For example, name, personal identification code, contact information). In addition, the Inspectorate does not agree with the following statement: Although the implementation of this measure may infringe the rights of some data subjects, the duration and scope of the measure is minimal and the positive consequences obtained by the data subject outweigh the minimal and rare negative consequences. We explain that in the opinion of the Inspectorate, it is not possible to conclude on the basis of the submitted materials that the possible positive consequences of one person outweigh the possible negative consequences of another person. AS A&P Mets has no way at Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 to predict whether a call is positive or negative for a person if data is

collected from all different Internet environments and it is not possible for a person to assume that he or she may be called to enter into a transaction related to a forest property. At the same time, AS A&P Mets does not have any prior knowledge of whether a person is interested in forest-related transactions or not. In addition, the analysis of legitimate interests states the following: The data subject has the right to object at any time to the processing of personal data concerning him or her on the basis of a legitimate interest. Upon receipt of the objection, the Company will not further process personal data. Although the Company is entitled to do so by law, in the event of an objection, the Company will not perform an additional analysis of the legitimate interest based on the circumstances of the specific situation or decide on the legitimate interest, but will terminate the data processing for a specific data subject. If the Data Protection Inspectorate agrees that in this case it is permissible to compile an internal database of persons who have asked to no longer contact them and delete their contact details, the Company shall compile a database to ensure knowledge of persons not to be contacted and to guarantee their right to be "forgotten". . We note that the possibility of filing an objection and reacting to it is in itself correct, but the following sentence remains incomprehensible: Although the Company is entitled to do so by law, the Company does not conduct additional legitimate interest analysis or decide on a legitimate interest. , but terminates the processing of a specific data subject on a permanent basis. Given that in a particular case the purpose is to realize a company's business interest by entering into a transaction with a person, making a price offer or educating a person on forest management, there could be no further legal basis for processing personal data in a situation where the person does not wish to do so. Thus, regardless of whether an objection is raised or a simple cessation of the processing of personal data is requested, the individual's request must in any case be granted.

2.1.4. The Inspectorate's final assessment of legitimate interest Based on the above, the Inspectorate finds that AS A&P Mets is prohibited from processing personal data concerning the acquisition of real estate owners' data (name, personal identification code) from the land register, searching for contact information from Internet search engines We also point out that personal data may not be processed on the basis of a legitimate interest in a way that cannot be reasonably foreseen by a person. In the repeated proposal we also stated the following: If the data subject cannot reasonably foresee the processing of his or her personal data, ie AS A&P Mets has no legal relationship with the data subjects (contractual relationship) and the data subject has not expressed a wish to receive sales offers . However, AS A&P Mets ignored this part and it was not possible to understand from the analysis of legitimate interest how people can predict that their personal data may be processed for the purpose of making offers related to forest transactions in a situation where their data is collected

from all kinds of online environments. In addition, it should be emphasized that, although the public availability of personal data may be a relevant factor in certain situations, it is necessary to consider the purpose for which the contact details have been disclosed. In a situation where the purpose of the initial disclosure (for example, selling a car) and further use (eg calling the landowner to make a forest-related transaction) do not coincide, the Inspectorate does not consider it possible to process personal data in this way on the basis of a legitimate interest. This is mainly because it is not possible for a person to foresee such processing of personal data. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 In addition to the above, the assessment of the legitimate interest of AS A&P Mets is too general and when reading it it is not possible to understand how the processing of personal data is necessary In order to exercise a legitimate interest of A&P Mets and whether and how the consideration has resulted in the legitimate interest of the company outweighing the interests or fundamental rights - and freedoms of the data subject. In addition, the arguments put forward in the analysis of legitimate interests are sometimes contradictory and incomprehensible.

3. Transparency of the processing of personal data: data protection conditions and notification of the data subject

The processing of personal data must fully comply with the principles set out in Article 5 (1) of the CISA, including points (a) and (d). The principle of transparency presupposes that all information and messages related to the processing of personal data are easily accessible, comprehensible and clearly worded. In other words, data protection conditions must be in place. The content of the data protection conditions is regulated by Articles 12 - 14 of the CCP. According to the materials of the case, AS A&P Mets does not collect personal data from the data subject itself, therefore the content of providing information to individuals must be based on Article 14 CISA. within one month or, if personal data are used to inform the data subject, at the latest at the time of the first notification to the data subject concerned (see Article 14 (3) of the CISA). In other words, AS A&P Mets should inform people about the processing of personal data no later than within one month of receiving the data, or if the person is called earlier, the information provided for in Article 14 (1) and (2) of the CISA must be notified at the time of first contact. As part of the supervision procedure, the Supervision Authority wanted to receive explanations on how AS A&P Mets complies with the requirement to inform people in accordance with Article 14 (3) of the CCIP. However, AS A&P Mets has not provided the Inspectorate with information on whether, how and when people will be notified of the processing of personal data. Accordingly, the company has not demonstrated to the Inspectorate that the processing of personal data ensures that the processing of personal data is transparent to the data subject in accordance with Article 5 (1) (a) of the CCIP. Even if there is a legal basis for the processing of personal data but the

processing of personal data does not comply with the principles set out in Article 5 (1) of the CISA, the processing of personal data is still prohibited. In view of the above and the fact that AS A&P Mets has not proved to the Supervision Authority compliance with Article 5 (1) (a) of the CCIP, further processing of personal data is therefore prohibited.

4. Accuracy of personal data

In addition, it can be seen from the materials of the case that the personal data being processed were not correct, ie the offer of the registered immovable was made to a person who did not own a specific registered immovable. The processing (including collection and use) of data in this way is also prohibited (see Article 5 (1) (d) of the CCIP). The Supervision Authority requested specific explanations showing whether and how AS A&P Mets will further ensure that the personal data processed is correct, ie the person to whom the call is made is in fact the person who owns the property that is the object of the offer. In the opinion submitted on 31.05.2021, the representative of AS A&P Mets stated the following:

Regarding the processing of correct personal data, the Client explains the following. Section II of the extract purchased for the registered immovable shows Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 The name of the owner of the registered immovable and his or her personal identification code. If the real estate is of interest to the Client even after reviewing the statement purchased for the real estate and the Client uses the public Google search engine to search for the contact number of the real estate owner, the Client will contact the person if there is sufficient legitimate interest. the date of birth is assimilated to publicly available data or the processing of accurate personal data is based on another method that has been established in advance. In addition, the Client considers it necessary to emphasize that the processing of false personal data in the light of the name of the case has not occurred in the Client's previous economic activities that have lasted for decades. Secondly, it appears from the correspondence between the parties that the Client repeatedly asked whether the person was still the owner of a specific immovable and promised to terminate the data processing immediately. Unfortunately, the data subject did not answer the Customer's relevant questions or ask to terminate the data processing. If the data subject had said upon the Client's request that he or she is not in fact the owner of a specific real estate, then the Client would have terminated the data processing immediately. The Client also asks for the position of the Supervision Authority regarding the matters mentioned in the last paragraph of the analysis of legitimate interests. The Supervision Authority agrees that in a situation where a person's personal identification code is available both in the land register and in the Internet environment containing contact information, it is very unlikely that the personal data collected will be incorrect. However, it cannot be said that the personal data collected is certainly correct if the collection of personal data and the verification of the

accuracy of the data are limited to the name. It must be taken into account that the data are collected from different sources and it is not possible to verify the accuracy of the data by checking the name alone. The person's phone number may also have changed and belong to a new person. Although AS A&P Mets claims that there have been no such cases, a complaint was received by the Inspectorate, according to which a person was contacted regarding a real estate that does not actually belong to the person. It is also irrelevant that in most cases the name and number of the property owner are likely to overlap, but it must be taken into account that there is always a risk that personal data will not be correct. In a situation where personal data is incorrect, ie the name of the property owner and the telephone number taken from the Internet environment do not match, this is a situation where the data is processed illegally. Considering the above, in the opinion of the Inspectorate, it is not possible to verify the correctness of the contact information by searching various Internet environments, and AS A&P Mets has not sufficiently proved the application of the principle of correctness of the information itself. Therefore, the processing of personal data in this way does not comply with Article 5 (1) (d) of the CISA and further processing of personal data is prohibited. The reference to the fact that AS A&P Mets repeatedly asked whether the person is still the owner of a specific real estate shows that AS A&P Mets is not convinced of this. However, it must be emphasized that the responsibility for proving whether, to whom and on what legal basis the data controller is called rests with AS A&P Mets. Summary In view of the above, AS A&P Mets has no legal basis (legitimate interest) to process personal data in a manner concerning the acquisition of real estate owners' data (name, personal identification code) from the land register, searching for contact information by internet owner's name / personal identification number and / or contacting people. In addition, the processing of personal data does not fully comply with the principles set out in Article 5 of the CISA, including paragraph 1 (a) and (d): - the processing is transparent to the data subject; - personal data is correct. Tatari tn 39/10134 Tallinn / 627 4135 / info@aki.ee / www.aki.ee Registry code 70004235 If the processing of personal data does not comply with the principles set out in Article 5 of the CISA, the processing of personal data is prohibited. Compliance with these principles is the responsibility of the data controller itself (see Article 5 (2) of the CISA). Therefore, the processing of personal data in this way must be stopped immediately and the illegally collected data must be deleted immediately. Pursuant to § 58 (1) of the Personal Data Protection Act and Article 58 (2) (f) and (g) of the General Data Protection Regulation, the Supervision Authority has the right to impose a temporary or permanent restriction on the processing of personal data, including a ban on processing. In a specific case, personal data are processed illegally (the data processing does not meet the requirements set out in Articles 5, 6 and 14 of the CISA), the

Inspectorate considers that a mandatory precept in the matter is necessary to terminate the offense as soon as possible. /

digitally signed / Raiko Kaur, lawyer, authorized by the Director General