

PROTECTION OF PRIVACY AND TRANSPARENCY OF THE STATE Tatari 39, Tallinn 10134/627 4135 / info@aki.ee /

www.aki.ee / Registry code 70004235 PRECAUTIONS-WARNING in personal data protection matter no. 2.1-6 / 20/1

Preceptor Data Protection Inspectorate Time of precept and place 28.01.2020, Tallinn Addressee of the precept - processor of personal data AS Postimees Grupp address: Maakri 23a, Tallinn 10145 e-mail address: postimeesgrupp@postimeesgrupp.ee;

legal@postimeesgrupp.ee Person in charge of the personal data processor Member of the Management Board RESOLUTION:

Subject to § 56 (1), (2) (8), § 58 (1) of the Personal Data Protection Act and Article 58 (1) (a) of the General Data Protection

Regulation, we issue a mandatory precept : To reply to the specification of the repeated proposal sent to the representative of

AS Postimees Grupp (hereinafter: processor) by the Data Protection Inspectorate No. 2.1.-1/19/3135 on 03.01.2020. We set

the deadline for compliance with the precept as 07.02.2020. Please notify the Data Protection Inspectorate of the e-mail

address info@aki.ee about the compliance with the precept no later than that deadline. can no longer review the challenge in

the same case). 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 a precept is not complied with by the specified term,

the Data Protection Inspectorate shall impose a penalty payment of 2,000 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: 28.08.2019. The applicant submitted a request to the Inspectorate requesting that the data of his minor

child be changed in the Postimees article so that the person could not be identified. 9/26/2019 The Inspectorate proposed to

the processor with the content: To change the data published in the network article about minors so that the persons would not

be identifiable (incl. indirectly identifiable). Also stop publishing the videos next to the article or make minors unidentifiable in

the videos. Please submit to the Inspectorate an overview of the amendment of the article no later than 10.10.2019.

10/11/2019 In his reply, the processor states that he agrees with the proposal to rename the applicants' children XXX in the

online article. Postimees has the same views regarding the second proposal, according to which the Inspectorate considers the grade levels of the aforementioned minor children to be superfluous. 12/06/2019 a The applicant clarifies his complaint and states that the editor has not amended one paragraph of the article and that his child is still identifiable in the video clips attached to the article. 12/18/2019 The Inspectorate proposes a clarification to the processor, to which a response is awaited no later than 27.12.2019. 03.01.2020. The Inspectorate will specify a repeated proposal to the processor, to which a response is awaited no later than 10.01.2020. On 19 January 2020, the applicant submitted to the Inspectorate a letter sent to the processor, together with a reply from the processor's representative, Kalev Korvi (Acting Editor-in-Chief), to the applicant on 17 January 2020. As of 28.01.2020, the Inspectorate has reviewed the article and established that it does not contain it after 18.12.2019. and the processor has not yet responded to the Inspectorate.

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. In view of the facts and the fact that it is mandatory to respond to inquiries made by the administrative authority in the course of supervision, but the processor has not replied to the inspectorate's repeated letters for a very long time, the Inspectorate considers it mandatory to issue and to assess possible irregularities. In the present case, the supervision procedure has taken an unreasonably long time, in particular because the processor has not submitted his replies to the supervisory authority in time. / signed electronically / on behalf of the Director - General