

Mathilde Lécaillon Lawways mathilde.lecaillon@lawways.com Yours: 14.10.2025

Ours: 21.10.2025 nr 2.2.-5/25/19d-4

Answer to request

Estonian Data Protection Inspectorate (DPI) has received your letter.

9th June letter is available on Estonian DPI document register: <u>Andmekaitse Inspektsiooni avalik</u> <u>dokumendiregister</u>.

In this letter we explained that the easiest way to notify about a data protection officer (DPO) in Estonia is through the <u>E-business register</u>. In this case, there is no need to send a separate notification to the DPI. The notification can be submitted to the e-business register by a person with <u>legal representation rights</u>. You must contact valid board members of the local company who have access to the register.

We noted that if the company has a representative with access to the E-business register services, the company can notify the appointment of a DPO through the portal (including making changes). If the DPO is published in the e-business register, there is no need to send a separate notification to the Data Protection Inspectorate. The Data Protection Inspectorate confirms receipt of the notification. The company is responsible for ensuring that the data protection officer is qualified and suitable for the role.

For more information on personal data processing, we recommend reviewing the information available on the <u>website</u> of the Data Protection Inspectorate (including <u>who can serve as a company's DPO</u>, who is actually responsible for proper data processing, and the explanations provided in the general guidelines for data controllers).

It is important to remember that the DPO must be able to communicate with both data subjects and the supervisory authority in Estonian language.

Respectfully

Liina Kroonberg lawyer authorized by Director General