

**CONTROLLER**  
Netlens Scandinavia AB

**Swedish reference number:**  
DI-2021-10455

**The Finnish SA reference number:**  
In the former system:  
257/182/2020, in the current  
system: TSV/12/2020

**IMI case register:**  
156781

**Date:**  
2025-07-28

# Final decision pursuant to Article 60 under the General Data Protection Regulation – Netlens Scandinavia AB

## Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection finds that Netlens Scandinavia AB has now complied with the complainant's request for erasure. In the light of the above, IMY finds no reason to take any further action in this case.

The case will hereby be closed.

## Presentation of the supervisory case

On December 15<sup>th</sup> 2021, the Swedish Authority for Privacy Protection, Integritetsskyddsmyndigheten (IMY), has initiated a supervision regarding Netlens Scandinavia AB (Netlens) due to a complaint. The complaint has been submitted to IMY, as lead supervisory authority pursuant to Article 56 of the General Data Protection Regulation (GDPR)<sup>1</sup>. The handover has been made from the supervisory authority of the country where the complaint has been lodged (The Office of the Data Protection Ombudsman (Tietosuojavaltuutetun toimisto), Finland) in accordance with the provisions of the GDPR on cooperation in cross-border processing.

The case has been handled through written procedure. In light of the complaint relating to cross-border processing, IMY has used the mechanisms for cooperation and consistency contained in Chapter VII of the GDPR. The concerned supervisory authority has been the data protection authority in Finland.

Netlens is a former warehouse company for the company that from September 3<sup>rd</sup> 2022 is named Wanda the Dragon AB.

The complainant has essentially stated the following. He has requested erasure of his social security number from Netlens on several occasions. Furthermore, it is a security risk that his social security number is his password on Netlens' website.

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<sup>1</sup> Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

On December 22<sup>nd</sup> 2021 Netlens has essentially stated the following. They are the controller concerning the processing to which the complaint relates. They have received the complainant's request for erasure on July 4<sup>th</sup> 2019. The complainant's social security number has been deleted from their system on July 31<sup>st</sup> 2019. Due to a human error, they have failed to inform the complainant that the deletion was carried out. They normally have a routine of sending a message of confirmation to a customer who has made this type of request, once the request has been complied with. At the time of the complaint, they did not have a fully automated system for notifying their customers when changes of the customer profiles were done. Such a notification to a customer had to be carried out manually. They have now updated their procedures for their customer service staff with a clear checklist of what to do if a customer requests a change or deletion of their personal data in their system. One of the bullet points on the checklist is to notify the customer of the outcome of the customer's request, as long as the customer has not explicitly requested to not be further contacted by them. On January 21<sup>st</sup> 2022, within the supervision, they have informed the complainant that his request for erasure was complied with on July 31<sup>st</sup> 2019.

Furthermore, Netlens states that customer login on their website requires both username and password. It is not possible for a user to only log in with their social security number. The customer's social security number is also not the customer's password. Their system automatically creates a new unique password when a customer account is created upon the customer's first order with them. The customer can choose a new password of their choice and even if the customer would then choose to change their password to become identical to their social security number, this information alone is not enough to log in. The customer also needs to provide a username when creating a new customer account. If a customer creates an account before placing their first order, they choose their own password.

IMY has sent Netlens' statement to the Finnish supervisory authority on September 20<sup>th</sup> 2024, asking them to give the complainant the opportunity to comment on it. On October 2<sup>nd</sup> 2024, the Finnish supervisory authority has forwarded the information that the complainant has stated that the complaint is no longer relevant. On March 27<sup>th</sup> 2025, the Finnish supervisory authority confirmed that they have not heard any further from the complainant regarding this case which, in their point of view, can lead to the assumption that the complainant is satisfied with the outcome, as his request for erasure had been fulfilled by the controller.

## Motivation for the decision

The applicant has requested erasure. According to Article 17(1) GDPR, the data subject shall have the right to obtain from the controller the erasure of his or her personal data without undue delay and the controller shall be obliged to erase personal data without undue delay, under certain conditions set out in the relevant article.

Both the complainant and Netlens have indicated to IMY that Netlens has now deleted the complainant's personal data in accordance with his request. IMY finds no reason to question that this has happened. IMY therefore finds that Netlens has thus complied with the complainant's right to erasure. Against this background, IMY finds no reason to take any further action in the case.

The case should therefore be closed.

## How to appeal

If you wish to appeal the decision, you should write to the Swedish Authority for Privacy Protection (IMY). Indicate in the letter which decision you wish to appeal and the change you are requesting. The appeal must have been received by IMY no later than three weeks from the day you received the decision. If the appeal has been received in time, IMY will then forward it to the Administrative Court in Stockholm for review.

You can e-mail the appeal to IMY if it does not contain any privacy-sensitive personal data or information that may be covered by confidentiality. IMY's contact information is shown in the first page of the decision.