

COMPLAINANT

See appendix

CONTROLLER

Klarna Bank AB

Swedish ref:
IMY-2024-9637

Date:
2025-10-20

Decision under the General Data Protection Regulation

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) finds that Klarna Bank AB (556737 – 0431) has now taken measures to comply with the complainant's requests for access and deletion. In the light of the above, IMY finds no reason to take any further action in the case.

The case is hereby closed.

Presentation of the supervisory case

The complainant has lodged a complaint under Article 77 of the General Data Protection Regulation (GDPR)¹ with the Netherlands authority for Personal Data against Klarna Bank AB (hereinafter Klarna, the company). In accordance with Article 56 of the GDPR, the Netherlands authority for Personal Data has forwarded the complaint to IMY as the lead supervisory authority.

IMY has initiated supervision of Klarna in order to investigate whether the company has complied with the complainants's request for erasure of 23 October 2020 pursuant to Article 17, and the request for access of 5 November 2020 pursuant to Article 15(1)(g).

The case has been handled through written procedure. IMY has used the mechanism for cooperation and consistency under Chapter VII of the GDPR.

The complainant has essentially stated that she never purchased anything through Klarna, that a representative from Klarna once informed how the complainants's personal data might have ended up with them, then requested further information, after which it remained silent. In support of the complaint, the complainant has submitted copies of her requests for erasure and access, and replies from Klarna. It states that the complainant asked how Klarna obtained her information.

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¹ 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).

Klarna has essentially stated the following. The company received the complainant's request for erasure of 23 October 2020. Klarna considers the request to have been processed. On 11 November 2022, on the grounds that the complainant stated not to have made the purchases, Klarna asked the complainant to confirm that she wanted the company to carry out the erasure, even though the company would then be unable to access the information necessary to handle a possible fraud case if the complainant wishes to request a refund. The complainant did not reply to this. As no confirmation was received, the erasure has not been carried out. Klarna also received the complainant's request for access of 5 November 2020 and responded to the complainant's questions on 5 September 2024. In connection with the requests, Klarna initially requested certain additional information from the complainant to handle the requests. The individual customer service employee did not inform the complainant that there were alternative amounts of data to confirm ones identity. This has been addressed with Klarna's customer service to prevent this from happening again. After further investigation in the individual case, the company decided that no further information was needed, provided that the complainant confirmed the request.

IMY has, through the Netherlands authority for Personal Data, given the complainant the opportunity to comment on Klarna's statement above, but the complainant has not responded.

Motivation for the decision

In accordance with Article 15(1)(g) of the GDPR, the data subject has the right to obtain information about the source of their personal data.

In accordance with Article 17 of the GDPR, the data subject has the right, under certain conditions, to have their personal data erased.

Article 12(2) of the GDPR requires the controller to facilitate the exercise of the data subject rights under, for example, Articles 15 and 17.

According to Article 12(6) GDPR, in the context of a request under Articles 15 and 17, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

Thus, the controller has an obligation both to facilitate the exercise of the data subject rights and to ensure that additional information is requested only where necessary in the individual case.

It has emerged that Klarna initially provided incomplete information to the complainant on what information the company needed to confirm the complainant's identity, and later considered that additional information was not needed if the complainant instead confirmed the request as described above. It is therefore questionable whether Klarna has facilitated the exercise of the complainant's rights in the present case.

However, IMY finds no reason to question that Klarna has now taken measures to comply with the complainant's request for access under Article 15(1)(g) of the GDPR and the request for erasure under Article 17.

In the light of the above, IMY finds no reason to take any further action in the case.
The case should therefore be closed.



Appendix

The complainant's personal data

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.