

**COMPLAINANT**

See appendix

**CONTROLLER**

Ted Valentin Travel Labs AB

**Swedish ref.:**  
IMY-2025-6716

**German ref.:**  
115/4-1.43

**IMI case register:**  
756408

**Date:**  
2025-11-25

# Decision pursuant to Article 60 under the General Data Protection Regulation – Ted Valentin Travel Labs AB

## Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) finds that the investigation does not show that Ted Valentin Travel Labs AB has failed to comply with the Data Protection Regulation (GDPR)<sup>1</sup> in the manner alleged in the complaint.

The case is closed.

## Presentation of the supervisory case

IMY has initiated a supervision against Ted Valentin Travel Holding AB with regard to a complaint. The complaint was submitted to IMY as lead supervisory authority pursuant to Article 56 of the GDPR. The handover was made from the supervisory authority of the country where the complaint was lodged (Germany, Saxony-Anhalt) 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 authorities have been the data protection authorities in Austria, Germany, France, and Italy.

The complainant has essentially stated the following.

The complainant discovered that information about her now terminated hairdressing business, including her personal data, appears on the website [www.gofriseur.de](http://www.gofriseur.de). The complainant states that the hairdressing business closed nine years ago and that the information is therefore no longer relevant. According to the website's privacy policy section, the data controller for the processing of personal data on [www.gofriseur.de](http://www.gofriseur.de) is

<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).

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Heyplaces.co.uk (Heyplaces). The complainant contacted Heyplaces on several occasions via the email address available on the website in question and requested erasure of her personal data. Heyplaces has not complied with the complainant's request.

The complainant found out that the domain owner of [www.gofriseur.de](http://www.gofriseur.de) is the company Ted Valentin Holding AB. According to the information in the complaint, Ted Valentin Holding AB is presumed to be the data controller for the processing of personal data on the website [www.gofriseur.de](http://www.gofriseur.de). However, the investigation has been directed towards the company Ted Valentin Travel Labs AB (company registration number 5567126791), as the investigation has revealed that Ted Valentin Travel Labs AB is responsible for the publication of personal data on the website. The investigation has also shown that the two companies have the same owner.

IMY has asked Ted Valentin Travel Labs (hereinafter referred to as Ted Valentin) questions regarding the complaint. On 11 July 2025, Ted Valentin answered that, after receiving IMY's letter, they have removed the personal data referred to in the complaint from the website [www.gofriseur.de](http://www.gofriseur.de).

IMY has, via the German supervisory authority, given the complainant the opportunity to comment on Ted Valentin's response. The complainant has not responded.

## Motivation for the decision

### Applicable provisions, etc.

The Swedish Data Protection Authority (IMY) shall handle complaints and, where appropriate, investigate the matter to which the complaint relates (Article 57(1)(f) of the GDPR).

It follows from Article 57(1)(f) of the GDPR that the IMY shall handle complaints from data subjects who consider that their personal data are being processed in a manner that infringes the GDPR. The provision further states that the IMY shall, where appropriate, investigate the matter to which the complaint relates.

Recital 141 of the GDPR states that the investigation of complaints should be carried out to the extent appropriate in the individual case. The Court of Justice of the European Union has stated that the supervisory authority shall investigate such complaints with due care.<sup>2</sup> According to Section 9 of the Swedish Administrative Procedure Act (2017:900)<sup>3</sup>, a case shall be handled as simply, quickly and cost-effectively as possible without compromising legal certainty. According to Section 23 of the Administrative Procedure Act, an authority shall ensure that a case is investigated to the extent required by its nature.

The provision in Article 57(1)(f) of the Data Protection Regulation means that the scope of the supervisory authority's investigation and assessment depends on the circumstances of the individual case. When assessing the extent to which a complaint should be investigated, consideration must be given to, among other things, the seriousness of the alleged infringement and the interests of both the complainant and the subject of the supervision in a swift and effective handling of the case. An

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<sup>2</sup> Schrems II judgment, Case C-311/18, EU:C:2020:559, paragraph 109.

<sup>3</sup> Förvaltningslag (2017:900).

exhaustive investigation of all legal and factual circumstances arising in connection with the complaint is not required; rather, it is up to the supervisory authority to decide to what extent the complaint should be investigated.<sup>4</sup> IMY is therefore under no obligation to use all the investigative powers available in each individual case.

## Assessment

The investigation has shown that Ted Valentin Travel Labs AB is responsible for assessing and deciding whether the personal data published on the website [www.gofriseur.de](http://www.gofriseur.de) should be removed and is responsible for the removal of the personal data. Against this background, IMY considers that the company can be regarded as exercising decisive influence over the processing of personal data in such a way that the company can be regarded as determining the purposes and means of the processing.<sup>5</sup> IMY therefore considers that Ted Valentin Travel Labs AB is the data controller for the processing within the meaning of Article 4.7 of the Data Protection Regulation.

The documents in the case show that Ted Valentin has now deleted the personal data referred to in the complaint. The complainant has been given the opportunity to comment on the company's response but has not responded. Against this background, IMY finds no reason to take any further action in the case.

In summary, IMY finds that the investigation of the case does not show that Ted Valentin Travel Labs AB has failed to comply with the Data Protection Regulation in the manner alleged in the complaint.

The case shall therefore be closed.

This draft decision has been approved by Head of Unit [REDACTED] after presentation by legal advisor [REDACTED]

[REDACTED]

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<sup>4</sup> This general consideration regarding the scope of the obligation to investigate are set out in Article 4 of the proposal for a regulation laying down procedural rules for cross-border cases under the Data Protection Regulation, which the Commission presented earlier. See in particular Article 4 and recital 6 of the proposal for a regulation. see [https://eur-lex.europa.eu/resource.html?uri=cellar:d02eb625-1a4d-11ee-806b-01aa75ed71a1.0005.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:d02eb625-1a4d-11ee-806b-01aa75ed71a1.0005.02/DOC_1&format=PDF).

<sup>5</sup> See the European Data Protection Board (EDPB) Guidelines 2020/07 on the concepts of controller and processor in the GDPR, paragraph 35.

**Appendix**

The complainant's personal data

## How to appeal

If you want to appeal the decision, you should write to the Authority for Privacy Protection. Indicate in the letter which decision you appeal and the change you request. The appeal must have been received by the Authority for Privacy Protection no later than three weeks from the day you received the decision. If the appeal has been received at the right time, the Authority for Privacy Protection will forward it to the Administrative Court in Stockholm for review.

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