



FOR INTERNAL USE

Holder of information: Data Protection Inspectorate

Notation made: 13.02.2026

The access restriction shall be valid until: 13.02.2101

Legal ground: Public Information Act § 35 (1) p 2, p 12

SA Norway
All SA-s

13.02.2026 no. 2.1-12/25/1550-3326-9

Article 60 Final Decision

Termination of supervisory proceedings

Estonian Data Protection Inspectorate (DPI) received a complaint via the cross-border procedure system from a Norwegian resident [REDACTED] (the Complainant) against [REDACTED].

Circumstances of the complaint

According to the complaint, the Complainant requested the deletion of their account on the 10th of August 2025 but initially received a response stating that account deletion was not possible due to issues related to payments. Later, the complainant received an additional response promising that the account would be deleted; however, according to the complaint, this was not done within the promised timeframe.

The Data Protection Inspectorate initiated a supervisory procedure under § 56 (3) point 8 of the Personal Data Protection Act¹ and sent an inquiry to the data controller on the 11th of November 2025.

The data controller responded to the inquiry on the 27th of November 2025, stating that according to the list² of [REDACTED] Group Companies and Controllers, the controller responsible for processing personal data in connection with [REDACTED] services in Norway is not [REDACTED], but [REDACTED] ([REDACTED], Controller).

[REDACTED] confirmed that the Complainant's deletion request was handled in accordance with [REDACTED]'s standard deletion procedure. The account deletion was scheduled for the 4th of September 2025 and was completed on the 24th of September 2025. Confirmation emails were sent to the Complainant to the e-mail address [REDACTED].

According to [REDACTED]'s response, users can request the deletion of the account at any time directly through the [REDACTED] app, using the self-service option. To ensure payment integrity, account deletion via the [REDACTED] app is only possible if there are no payment issues, pending orders, unpaid fines, or active account suspensions. If such conditions exist, the account deletion request is handled by [REDACTED]'s Customer Support Team (CS Team), which assesses the situation and assists the user once the underlying issues are resolved.

¹ [Personal Data Protection Act – Riigi Teataja](#)

² Available: [REDACTED].

■■■■ explained that in this case, the Complainant's account had payment issues because they had made several ride attempts using expired or insufficiently funded payment methods. The case was then reviewed by ■■■■'s anti-fraud team, which assessed the situation and allowed the account deletion. Subsequently, ■■■■'s Customer Support Team deleted the account in accordance with the established procedure.

On the 12th of December 2025, the Norwegian Data Protection Authority forwarded the Complainant's confirmation that, although they had not received ■■■■'s emails regarding the deletion, they believe the account has been deleted.

The position of the Estonian Data Protection Inspectorate

1. According to Article 17 of the General Data Protection Regulation (GDPR), the data subject has the right to request the erasure of their personal data, and the data controller must delete the personal data without undue delay. The controller is obliged to erase the personal data without undue delay if one of the circumstances listed in Article 17(1) (a–f) of the GDPR applies. Article 17(3) of the GDPR provides exceptions when the right to erasure does not apply. According to Article 12 (3) of the GDPR, the controller must respond to the data subject's erasure request without undue delay and within one month of receipt of the request.
2. In the current case, the Complainant submitted an account deletion request to ■■■■ on the 10th of August 2025 via the ■■■■ Support Agent option. Based on the conversation between the Complainant and ■■■■, the Complainant initially received a response stating that account deletion was not possible according to the privacy policy due to payment-related issues. During further communication, the Complainant's request was forwarded to the appropriate department for resolution. ■■■■ responded to the Complainant on the 5th of September 2025, stating that the technical difficulties related to the Complainant's account had been resolved and that the account deletion was scheduled for the 24th of September 2025. In its response to the inquiry from the Estonian DPI, ■■■■ explained that it was necessary to involve ■■■■'s anti-fraud team to fulfil the Complainant's request, because the Complainant had made several ride attempts using expired or insufficiently funded payment methods.
3. ■■■■ notified the Complainant via the app and sent an email on the 5th of September 2025, confirming that the deletion request had been approved. ■■■■ sent an additional email on the 24th of September 2025, confirming that the account had been deleted. Considering that the Complainant submitted the initial deletion request on the 10th of August 2025, ■■■■ responded to the request within the one-month deadline set out in Article 12(3) of the GDPR. Although the Complainant did not receive ■■■■'s emails regarding the deletion, they confirmed that their account has now been deleted.
4. According to the complaint, the Complainant asks the data protection authority to consider imposing a fine on the data controller. The Estonian DPI explains that the application of supervisory measures is at the DPI's discretion. Although ■■■■ initially provided contradictory information regarding account deletion, ■■■■ responded to the Complainant's deletion request within the one-month deadline. ■■■■ has explained to the DPI why it was necessary to involve the anti-fraud team in handling the Complainant's deletion request.
5. **Considering that the Complainant has confirmed that their account has been deleted, the DPI closes the supervisory procedure in this matter.**

This notice of termination of the supervision proceedings can be challenged within 30 days by submitting an appeal to the administrative court under the Code of Administrative Court Procedure.³

Respectfully



lawyer
authorized by Director General

³ [Code of Administrative Court Procedure – Riigi Teataja](#).