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23 May 2025

J.No. 2025-7321-1493

Doc.no. 734946

Caseworker
[REDACTED]

Sent with Digital Post

Final Decision – IMI CR 59254

Regarding your complaint about PayPal S.à r.l.

The Danish Data Protection Agency (hereinafter the Danish DPA) hereby returns to the case, where, on 14 March 2021, you made a complaint about PayPal S.à r.l. (hereinafter PayPal) to the Danish DPA.

The Danish DPA considered that the specific case involved cross-border processing of personal data. As part of the cross-border cooperation mechanism cases, the Danish DPA submitted the case to the other EU supervisory authorities on 10 May 2021. The Luxembourg supervisory authority, the Commission nationale pour la protection des données Grand-Duché de Luxembourg (CNPD for short), has dealt with the case as a lead (competent) supervisory authority. This is due to the fact, that PayPal's Place of the Central Administration that decides on the purpose and means is located in Luxembourg.

Overall, your complaint states that since the beginning of 2021, you have tried to correct an invalid phone number in your PayPal account, but that this was not possible as you could not log in to your PayPal account without a valid phone number. Furthermore, you have stated in your complaint that since January 2021 you have on several occasions tried unsuccessfully to contact PayPal in Denmark and the USA respectively in order to receive support.

The Luxembourg supervisory authority will take no further action on your complaint

The Luxembourg supervisory authority has now decided to discontinue its investigation and the case is therefore closed by this letter. The Luxembourg supervisory authority has hereby decided to reject your complaint pursuant to Article 60(8) of the General Data Protection Regulation (hereinafter GDPR).

Reasons given by the Luxembourg supervisory authority

Article 57(1)(f) of the GDPR requires supervisory authorities to handle complaints lodged by a data subject and investigate, to the extent appropriate, the matter of the complaint.

Furthermore, it follows from Article 77 of the GDPR that the data subject or his or her representative has the right to lodge a complaint with the supervisory authority against the processing of data concerning him or her.

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It also follows from Article 16 of the GDPR that the data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

In addition, it follows from Article 12(2) of the GDPR that the data controller must facilitate the exercise of the data subjects' rights under Articles 15 to 22 of the GDPR.

Following your complaint, the Luxembourg supervisory authority has asked PayPal to address the facts set out in your complaint and to provide an account of the processing of your personal data, in particular with regard to the right to enrichment. PayPal provided the requested information to the Luxembourg supervisory authority within the specified deadline.

PayPal, in its reply to the Luxembourg supervisory authority, PayPal stated that it had replied to your enquiries four times since January 2021 and that on 5 January 2021 PayPal had asked you to provide your telephone number so that PayPal could contact you by telephone to verify your telephone number and subsequently update the invalid telephone number in your PayPal account. Most recently, PayPal contacted you on 18 August 2021. However, PayPal has stated that you have not responded to their inquiries. A copy of these messages has been sent to the Luxembourg supervisory authority.

On this basis, the Luxembourg supervisory authority is of the opinion that PayPal wanted to rectify your phone number in your PayPal account, but that PayPal has not been able to contact you.

Closing remarks

On the basis of the above, the Danish Data Protection Agency considers the case closed and does not take any further action in relation to your complaint.

Decisions of the Danish DPA may not be appealed to any other administrative authority, cf. Section 30 of the Data Protection Act. However, the decisions of the Danish DPA may be challenged before the courts, cf. Section 63 of the Constitution.

Kind regards

A black rectangular box used to redact the signature of the official.