IMY. Swedish Authority for Privacy Protection

COMPLAINANT
See appendix

CONTROLLER
Klarna Bank AB

Swedish ref.:
IMY-2025-8256

German ref:
521.13789 /631.327

IMI case register:
134712

Date:
2025-12-17

Decision pursuant to Article 60 under the General Data Protection Regulation – Klarna Bank AB

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection finds that Klarna Bank AB (556737-0431) in its handling of the complainant's requests for access made on September, 27 2020 has processed personal data in breach of:

- Article 12(6) GDPR[1] by requesting more data than is necessary to identify the complainant
- Article 12(2) of the GDPR by not facilitating the exercise of the complainant's rights.

The Swedish Authority for Privacy Protection issues a reprimand to Klarna Bank AB pursuant to Article 58(2)(b) of the GDPR for the infringements of Articles 12(6) and 12(2) of the GDPR.

Presentation of the supervisory case

Background and demarcation

The Swedish Authority for Privacy Protection (IMY) has initiated supervision in case with Swedish reference number IMY-2022-7128 to investigate 28 complaints2 against Klarna Bank AB (Klarna). Subsequently, IMY has decided that the further investigation of each complaint will take place in separate cases.

IMY's investigation of the complaint in the present case has been limited to the questions whether Klarna has been able to identify data referring to the complainant, if the company has acted in accordance with Article 12(6) of the GDPR when Klarna requested data to identify the complainant and facilitated the complainant's exercise of its right of access in accordance with Article 12(2) of the GDPR. The investigation in the case concerns Klarna's handling of the complainant's requests for access made on 10 December 2018 and 9 July 2020. IMY will therefore not take a position on whether

Postal address:
Box 8114
104 20 Stockholm
Sweden
Website:
www.imy.se
E-mail:
imy@imy.se
Telephone:
+46 (8) 657 61 00

[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's current, general routines for handling requests are compatible with the General Data Protection Regulation.

The complaint in the case has been submitted to IMY, as lead supervisory authority under Article 56 GDPR. The transfer has taken place from the supervisory authority of the country where the complainant has lodged the complaint (Germany) in accordance with the provisions of the Regulation on cooperation in cross-border processing.

The proceedings before IMY were conducted by exchange of letters. IMY has made use of the cooperation and consistency mechanisms provided for in Chapter VII of the GDPR. Relevant supervisory authorities have been the data protection authorities of Austria, Hungary, Denmark, Germany, Norway, Finland, Italy, the Netherlands, Poland, Ireland, France, Estonia and Spain.

Statement by the complainant

The complainant states, in essence, as follows.

On September, 27 2020 the complainant requested access to his personal data pursuant to Article 15 of the GDPR.

In his request the complainant provided the following information:

- first and last name
- e-mail address
- address.

The complainant states that Klarna required the following information in order to handle the request:

- birthday
- e-mail address used for purchases with Klarna
- invoice number
- exact invoice amount
- the name of a shop that the complainant made a purchase from.

Klarna has also requested a telephone number to send a password to the complainant in order for him to be able to open a copy of the personal data. Klarna has also requested the transaction ID and IBAN number in the event that the complainant had used Klarna Open Banking via a third-party provider and wished to have access to the personal data stored by those parties.

The complainant has sent a copy of his identity card to Klarna and claimed that it is not necessary for him to provide further information for identification purposes. Klarna informed the complainant that, in order to continue the identification process, he had to provide an email address that he had used for purchases at Klarna and a telephone number in order to be able to receive the mailing digitally. The complainant informed Klarna that he had used different e-mail addresses for purchases made true Klarna and provided Klarna with one of the addresses he had used. He has also asked to receive the copy of his personal data by post. Klarna then informed the applicant that a copy of the personal data relating only to purchases made using the email address he had provided had been sent to him by post. The complainant has also been informed that he had to provide all the e-mail addresses used for purchases with Klarna in order to be able to obtain a complete copy of the data that Klarna processes. The complainant replied to Klarna that it should have been possible to send such a copy without the additional information, since he had provided a copy of his identification document. Klarna replied that the complainant's request could not be completed if he did not submit the information requested and that a copy of the complainant's identity card was not sufficient to identify him. According to the complainant, Klarna has wrongly refused to provide him with all the information he is entitled to according to GDPR.

Statement by the controller

In summary, Klarna has stated the following about the issues covered by the supervision in this case.

Klarna received the complainant's request for access by e-mail on September, 27 2020 and started the identification process on September, 28 2020. The complainant has sent all the requested information to Klarna except for his telephone number in order to be able to receive the mailing digitally (which was not necessary because the complainant instead to receive the copy of his personal data by post instead). Klarna has informed the complainant that the copy would only the personal data linked to the email address that he had provided to Klarna. The complainant has objected to providing the other e-mail addresses he used when making purchases true Klarna. Subsequently, on October, 16 2020, Klarna sent a copy of the complainant's personal data relating to the email address provided by the complainant to the complainant by post.

Klarna states that the complainant was asked to provide the following information:

- birthday
- e-mail address
- invoice number
- the name of a shop the complainant made a purchase from
- order number.

The complainant has also been asked to provide a telephone number in order to send a password in order to get access to the copy of his personal data.

What data was collected when the customer relationship was established and which are new?

When the customer relationship was established, the complainant's name, e-mail address, telephone number and address were collected.

Has Klarna had reason to doubt the identity of the appellant?

Klarna had no reason to doubt the applicant's identity, since it had sufficient data points to identify the complainant and therefore provided him with a copy of his personal data. The individual customer service employee who repeated the request for more information about the complainant should not have done so.

Motivation for the decision

Applicable provisions, etc.

According to Article 11(2) of the GDPR, where, in the cases referred to in paragraph 1 of the article, the controller is able to demonstrate that it is not in a position to identify the data subject, the controller shall, if possible, inform the data subject accordingly. In such cases, Articles 15 to 20 shall not apply except where the data subject for the purpose of exercising its rights under those articles provides additional information enabling the identification.

Article 12(6) of the GDPR states that, without prejudice to Article 11 of the GDPR, where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

Pursuant to Article 12(2) of the GDPR, the controller shall facilitate the exercise of the data subject's rights in accordance with Articles 15 to 22. In the cases referred to in Article 11(2), the controller shall not refuse to act on the request of the data subject for exercising his or her rights under Articles 15 to 22, unless the controller demonstrates that it is not in a position to identify the data subject.

Assessment

In order to ensure the security of the processing and to minimise the risk of unauthorised disclosure of personal data, the controller must be able both to find out which data relate to the data subject (identification) and also to confirm the identity of the person requesting access to that data (authentication).[2]

In the present case, Klarna stated that it had sufficient data points to confirm the complainant's identity, but was unable to identify all the information relating to the complainant because he had not provided all the information enabling such identification.

Has Klarna been able to identify data relating to the appellant?

Klarna states that it was not in a position to identify all personal data processed about the complainant because the complainant did not provide all the e-mail addresses he used for purchases with Klarna. IMY finds no reason to question that Klarna needed those email addresses in order to be able to identify all personal data relating to the complainant. Furthermore, it is apparent from the investigation in the case that Klarna has repeatedly informed the complainant that he had to provide all the e-mail addresses, in order to obtain a complete copy of his personal data and that he had submitted such information. Klarna has therefore provided the complainant with a copy that was limited to the personal data that Klarna could identify about him using the one email address he had provided.

Klarna has thus shown that it was not in a position to identify all personal data relating to the complainant in the manner described in Article 11(2) of the GDPR. Against this

[2] European Data Protection Board (EDPB) Guidelines on the right of access – Guidelines 01/2022 on data subject rights – Right of access, version 2.0 (finally adopted on 28 March 2023) (EDPB Guidelines 01/2022), paragraph 58.

background, IMY considers that Klarna had neither an obligation, nor an opportunity, to provide the complainant with a complete copy of the personal data connected to all the purchases the complainant had made true Klarna.

Has Klarna acted in accordance with Article 12(6) of the GDPR when Klarna requested information to identify the complainant?

It is only where the controller has reasonable doubts about the identity of the person making the request that further information to confirm the identity may be requested.

The complainant has stated that he submitted his first name, surname, address and e-mail address when he made his request for access to Klarna. When Klarna asked for more data to identify him, he sent a copy of his identity card to the company. Klarna has stated that the company had sufficient data to identify the complainant. Klarna has therefore sent him a copy of all personal personal data, which included all the information Klarna had been able to identify about him. The investigation in the case also shows that Klarna subsequently requested additional information from the complainant, which Klarna now states should not have been done since the company had sufficient information to identify the complainant.

In view of the fact that Klarna did not have reasonable grounds to doubt the identity of the complainant and nevertheless requested additional information for this purpose, IMY concludes that Klarna has processed the complainant’s data in breach of Article 12(6) of the GDPR.

Has Klarna facilitated the exercise of the applicant’s right of access under Article 12(2) of the GDPR?

Article 12(2) of the GDPR requires the controller to facilitate the exercise of the data subject’s rights in accordance with Articles 15 to 22.

Klarna has requested the complainant to provide information on, inter alia, the invoice number, the name of a shop at which the complainant had previously made a purchase from and the order number. This is despite the fact that the information requested by Klarna was not necessary to identify the complainant. Against this background, IMY considers that the verification method was too burdensome for the appellant in such a way that it complicated the exercise of the right of access.

IMY thus concludes that Klarna has not facilitated the exercise of the data subject’s right as required by Article 12(2) of the GDPR. Klarna therefore processed the complainant’s personal data in breach of Article 12(2) of the GDPR.

Choice of corrective measure

In case of deficiencies, IMY may take certain corrective actions. It follows from Article 58(2) and Article 83(2) of the GDPR that IMY has the power to impose administrative fines in accordance with Article 83. In the case of a minor infringement, IMY may, as set out in recital 148, instead of imposing a fine, issue a reprimand pursuant to Article 58(2)(b). Account shall be taken of aggravating and mitigating circumstances of the case, such as the nature, gravity and duration of the infringement and relevant previous infringements.

IMY notes the following relevant facts. IMY has found that Klarna has requested more information than what was necessary to identify the complainant. However, the information requested by Klarna has not consisted of sensitive, particularly protective or otherwise privacy-sensitive data. IMY further notes that Klarna has not facilitated the exercise of the complainant's right of access. However, Klarna responded without undue delay to the complainant's email and has complied with the complainant's request, to the extent Klarna was required to, with the result that the deficiencies found are less serious than if the request ha been left unanswered.

In the light of the foregoing, IMY considers that these are minor infringements within the meaning of recital 148 that require Klarna to be given a reprimand under Article 58(2)(b) of the GDPR for the infringements found.

This decision has been made by Legal Advisor [redacted] following a presentation by Legal Advisor [redacted].

Appendix
The complainant's personal data