Complainant
See Annex

Controller
Klarna Bank AB

Case number:
IMY-2024-13227

National case number at the Austrian SA:
D130.1827

Case register in IMI:
CR 690396

Date:
2026-01-21

Decision pursuant to article 60 of the General Data Protection Regulation – Right to rectification and erasure

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) finds that Klarna Bank AB has failed to comply with Article 16 and Article 17 in the General Data Protection Regulation[1] by not complying with the complainant's request to exercise their right to rectification and erasure. IMY also finds that Klarna has failed to comply with Article 12.2 in the General Data Protection Regulation by not facilitating the exercise of the data subject's rights.

Pursuant to Article 58(2)(c) of the General Data Protection Regulation, IMY orders Klarna to comply with the complainant's request to exercise their right to erasure. The measures must be implemented no later than two weeks after this decision becomes final.

Description of the supervision

The handling of the case

IMY has initiated supervision of Klarna Bank AB (hereinafter referred to as Klarna, the company) in order to investigate whether Klarna has complied with the complainant's request to have their personal data corrected in accordance with Article 16 of the General Data Protection Regulation (GDPR). The complaint has been transferred from the supervisory authority in the country where the complainant submitted their complaint (Austria) in accordance with the provisions of the GDPR on cooperation in cross-border processing.

IMY has handled the complaint in its capacity as the competent supervisory authority, based on where the company has its main establishment (in Stockholm, Sweden) in accordance with Article 56 of the GDPR. Due to the cross-border nature of the supervisory case, IMY has made use of the cooperation and consistency mechanisms provided for in Chapter VII of the GDPR. The supervisory authorities concerned have

[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).

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been the data protection authorities in Austria, the Netherlands, Norway, Ireland, Hungary, France, Belgium, Italy, Finland, Germany and Denmark.

The case has been handled through written correspondence. IMY has forwarded Klarna's statements to the Austrian supervisory authority, which has been asked to communicate the information to the complainant. The complainant has responded and commented on Klarna's response.

Findings of the investigation

The complainant has stated the following.

The complainant discovered a name and address belonging to another person on her Klarna account. Other personal data about the complainant, i.e. her date of birth, email address and country of residence, were correct. When the complainant discovered the error, she deleted her bank details from her Klarna account. In February 2024, the complainant contacted Klarna's security department and customer service regarding the error and received confirmation that her personal data had been mixed up with another customer's data. When she later submitted a written request for correction, she received a response asking her to provide identification documents and proof of address. Klarna also informed the complainant that the mix-up was due to the fact that her Klarna account had been used by two people. The complainant's agreement with Klarna only allows the account to be associated with one user's details. Klarna informed the complainant that their system is not designed for a Klarna profile to be used by two people, as entering different address details is classified as a security risk. The complainant claims that she has only entered her own address. She has not changed her address and believes that what has happened indicates a security gap at Klarna.

The complainant has requested that Klarna delete her personal data. The complainant has submitted a copy of the email correspondence she has had with Klarna regarding the matter. The correspondence shows that on 11 March 2024, Klarna asked the complainant to submit additional information in the form of her passport and proof of address. It also shows that Klarna, in its request for further information from the complainant, referred to a specific case number for the complainant's case. The complainant sent a copy of her passport and proof of address to Klarna on 18 March 2024. In her reply, the complainant stated the same case number as in Klarna's request for further information. On the same day, 18 March 2024, the complainant received a written response from Klarna stating that her request would be handled separately by Klarna's specialist department under a different order number via a different email address from the complainant. For security reasons, the complainant was asked to respond exclusively to a previous email dated 11 March 2024. Klarna has not responded to the complainant's request since then.

IMY has submitted written questions to Klarna regarding the complaint. Klarna has stated the following.

Klarna received the complainant's request for correction on 23 February 2024 and began processing the complainant's request. On 11 March, Klarna contacted the complainant and asked her to submit valid identification and proof of address as documentation for the correction of the information. Klarna is obliged to ensure that personal data is accurate and that corrections are based on verifiable information. At the time Klarna submitted its response to IMY's questions on 23 May 2025, Klarna had not received the requested information from the complainant. Correction has therefore not been possible. As soon as complete documentation is received, the request will be processed in accordance with Klarna's data protection procedures.

The complainant has been given the opportunity to comment on Klarna's response. In her reply the complainant has stated that she believes she has provided the information requested by Klarna and refers to her email dated 18 March 2024. The complainant further states that she has previously received a register extract from Klarna showing that they have processed her correct address.

IMY has asked Klarna additional questions. IMY has asked Klarna if, apart from instructing the complainant to continue the communication via an earlier email thread, they have informed her about the reasons her request have not been complied with. Klarna referred to their email on 11 March 2024 where they informed the complainant that the matter was being handled separately by a special department under a specified case number and instructed the complainant to respond only to the ongoing correspondence. The complainant had previously been asked to provide proof of identity and address because the name and address in the register did not match and Klarna needed to verify the complainant's identity before the company could proceed with any correction or disclosure of information. This procedure is in line with Klarna's standard policy that identity verification is required before personal data is disclosed or changed, in accordance with banking secrecy and GDPR Article 12(6).

IMY has also asked Klarna whether it is possible for the company, based on the total information Klarna has access to about the complainant and the complainant's request, to take measures to comply with complainant's request. Klarna has stated that it can only take measures to satisfy the complainant's request if sufficient identity verification has been carried out. According to Klarna's identification procedures, at least three pieces of information are required: full name, email address used for the purchase and date of birth. If there are inconsistencies (e.g. use of multiple email addresses), Klarna may require additional identification information, such as proof of address or a copy of ID. As the complainant's request concerned two different email addresses and an account with a different name and address in another country, Klarna was unable to reliably link the person to the profile without these verification documents. Klarna's ability to act on the request therefore remains dependent on obtaining valid identity and address documents.

Motivation for the decision

IMY has investigated whether Klarna has handled the complainant's request for rectification and erasure of her personal data in accordance with Articles 16 and 17 of the GDPR and whether the company has facilitated the complainant’s exercising of her rights according to Article 12.2 of the GDPR.

Applicable provisions etc.

Article 57(1)(f) of the GDPR requires IMY to handle complaints lodged by data subjects who considers that the processing of personal data relating to him or her infringes the GDPR. The provision further states that the supervisory authority shall investigate, to the extent appropriate, the subject matter of the complaint and inform the complainant of the progress and the outcome of the investigation within a reasonable period, in particular if further investigation or coordination with another supervisory authority is necessary. The CJEU has stated that the supervisory authority shall investigate such complaints with due diligence.[2]

According to section 23 of the Swedish Administrative Procedure Act (Sw. Förvaltningslagen (2017:900)) a public authority shall ensure that a matter is investigated to the extent that is required by its nature.[3]

According to Article 5.1 d of the GDPR, personal data must be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

According 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 comply with the data subject's request to exercise his or her rights under Articles 15 to 22, unless the controller demonstrates that it is unable to identify the data subject.

According to Article 12.6 in the GDPR the controller may, in the case where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, request the provision of additional information necessary to confirm the identity of the data subject.

According to Article 16 of the GDPR, the data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

According to Article 17 of the GDPR, the data subject shall have the right to have their personal data erased without undue delay, provided that one of the following situations applies.

a) The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.

b) The data subject withdraws consent on which the processing is based according to Article 6(1)(a) or Article 9(2)(a), and there is no other legal ground for the processing.

c) The data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2).

d) The personal data have been unlawfully processed.

e) The personal data must be erased to comply with a legal obligation under Union or Member State law to which the controller is subject.

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[2] See judgement of the Court of Justice of the European Union, Schrems II, case C-311/18, EU:C:2020:559, paragraph 109

[3] 23 § förvaltningslagen (2017:900).

f) The personal data have been collected in relation to the offer of information society services in cases referred to in Article 8(1).

According to Recital 59 to the GDPR, modalities should be provided for facilitating the exercise of the data subject's rights under this Regulation, including mechanisms to request and, if applicable, obtain, free of charge, in particular, access to and rectification or erasure of personal data and the exercise of the right to object.

Assessment

The complainant has initially requested for the incorrect name and address on her Klarna account to be corrected. She has then requested for all her personal data to be deleted. IMY notes that Klarna has not complied with the complainant’s request for rectification or erasure in accordance with the GDPR, with the motivation that the company needs additional information in order to identify the complainant.

It is IMY’s view that Klarna may have had reason to, due to the mix up of the complainant’s personal data, to request additional information from the complainant in order to verify her identity, given that it has been necessary in order to confirm the identity of the data subject and if Klarna has had reasonable doubts concerning the identity of the natural person making the request (Article 12.6 in the GDPR). In this regard, IMY takes into account that the EDPB Guidelines 01/2022 that a request for additional information in order to confirm the identity of the data subject according to Article 12.6 can only be done if it’s proportionate in the individual case and cannot contain more data than what is necessary in order to confirm the identity of the data subject. Such additional information should not be more than the information initially needed for the authentication of the data subject.[4]

The complainant and Klarna have different views regarding whether the complainant has submitted the information required in order for Klarna to be able to comply with the complainant’s request. However, the documentation submitted by the complainant indicates that the complainant, the 18 March 2024 has sent the information requested by Klarna via email, in form of a copy of her passport and a registration confirmation from the municipality, and that Klarna has replied to the email. IMY finds, against this background no reason to question that Klarna, at the time of the 18 March 2025 has had access to information about the complainant’s name, email, information that the complainant is a user of the related Klarna account along with a copy of the complainant’s passport and proof of address which the complainant has provided upon request, and that Klarna has been able to verify the complainant’s identity from this information. IMY further notes that Klarna since the 18 March 2024 has not answered the complainant.

Against this background, IMY finds that Klarna has not facilitated the complainant’s exercising of her right to rectification and erasure in the way required in Article 12.2 in the GDPR.

Regarding the appearance of incorrect personal information on the complainant’s Klarna account, the investigation has not shown how the incorrect information ended up on the account. IMY does not find it proportionate to further investigate the matter in this regard. IMY nonetheless notes that Klarna has not taken action in order to correct the information despite having been made aware of the incorrect information by the complainant. It is IMY’s view that any limitations to the functionalities in Klarna’s

[4] Se EDPB Guidelines 01/2022 p. 65-68.

services does not exempt Klarna from the obligation to ensure that incorrect personal data are deleted or corrected without undue delay in accordance with Article 5.1 d in the GDPR.

In summary, IMY finds that Klarna Bank AB has failed to comply with Articles 16 and 17 in the General Data Protection Regulation by not complying with the complainant's request to exercise her right to rectification and erasure. IMY further finds that Klarna has failed to comply with Article 12.2 in the General Data Protection Regulation by not facilitating the data subjects exercising of their rights.

Choice of corrective measures

IMY has the power to take corrective measures against a controller or processor who has failed to comply with the GDPR. According to article 58.2 and 83.2 in the GDPR, IMY has the power to order to impose an administrative fine pursuant to Article 83 in the regulation. If the infringement is minor as stipulated in Recital 148 in the GDPR, IMY may, instead of imposing an administrative fine, issue a reprimand in accordance with Article 58.2. Due regard should however be given to aggravating or mitigating factors such as the nature, gravity and duration of the infringement or any relevant previous infringements.

IMY fins that Klarna has processed the complainant's personal data in breach of Articles 16, 17 and 12.2 in the GDPR. The infringements have however only affected one singular complainant. Against that background and an overall assessment of the circumstances of the case, IMY finds that the breach is minor pursuant to Recital 148 and that Klarna therefore shall be given a reprimand for the infringements in accordance with article 58.2 b in the GDPR.

The investigation has shown that Klarna has not handled the complainant's request for erasure. IMY thus finds reason to, in accordance with Article 58.2 c in the GDPR, order Klarna to comply with the complainant's request to exercise her right to erasure. The measures must be implemented no later than two weeks after this decision becomes final.

This decision has been made by the head of unit [redacted] after being presented by the legal advisor [redacted].

Annex
The Complainant's personal data

Copy to
Data Protection Officer