Complainant
See Appendix

Object of supervision
Klarna Bank AB

Swedish ref.:
DI-2021-10187

Danish ref.:
2021-7329-0075

IMI case register:
164557

Date:
2026-01-27

Decision under the General Data Protection Regulation

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) notes that, in the processing of the applicant's request for erasure, Klarna Bank AB (556737-0431) (Klarna) has processed personal data in breach of Article 12(6) of the GDPR[1] by requesting more data than is necessary to identify the applicant.

IMY issues a reprimand to Klarna in accordance with Article 58(2)(b) of the GDPR for infringement of Article 12(6) of the GDPR.

Presentation of the supervisory case

IMY initiated supervision of Klarna in order to determine whether the applicant's request for erasure was received and processed correctly (Article 17 GDPR) and whether the applicant's request was dealt with clearly and within the legal time limits (Article 12 GDPR). The complaint was forwarded by the supervisory authority of the country where the complainant lodged his complaint (Denmark), in accordance with the provisions of the regulation on cooperation on cross-border processing. IMY dealt with the complaint as lead supervisory authority under Article 56 of the GDPR.

The procedure took the form of an exchange of letters. Due to the transnational nature of the control case, IMY used the cooperation and consistency mechanisms provided for in Chapter VII of the GDPR. The supervisory authorities concerned are the data protection authorities of Denmark, Germany, Austria, Italy, Poland and Finland.

The applicant states, in essence, the following. After buying and returning goods, the applicant was in contact with Klarna five times in order to request the erasure of his personal data.

Klarna state, in essence, the following. They received an oral request for erasure on 8 April 2021, when the applicant challenged an invoice. They also received a further oral

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[1] Council 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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request for erasure on 4 May 2021. Lastly, they received a written request for removal via an online form on 28 May 2021.

Initially, Klarna was not able to erase the complainant's personal data, as the complainant had an ongoing debt towards them. Klarna would only be able to delete the personal data once the arrears have been settled.

The complainant then requested that their personal data would be deleted after the case was closed. Finally, the complainant paid their debt on 14 May 2021. At the time of this, the applicant was not in contact with Klarna.

On 28 May 2021, the complainant submitted a written request for erasure by means of an online form. On the same day, Klarna's customer services contacted the complainant requesting additional information in order to verify the complainant's identity in accordance with the current identification procedures established by Klarna. However, the applicant did not submit the requested information and, as such, the erasure process did not start.

Upon receiving information about IMY's supervision, Klarna carried out an examination of the investigation of the complainant's file. Following that examination, they erased the complainant's personal data on 16 December 2021. Klarna has since reviewed their method of identification. Had the new process for identification been applied at the request on 28 May 2021, the complainant's identity would have been considered to have been verified at that time and the removal process would have been initiated.

Reasons for the decision

The applicable provisions, etc.

The complainant requested the erasure of his personal data. The right to erasure derives from Article 17 of the GDPR. That provision allows a data subject to request, under certain conditions, the erasure of the data subject's personal data from a controller.

It follows from Article 12(6) that a controller may, where it has reasonable grounds to doubt the identity of the natural person making a request under Articles 15 to 21, request that the additional information necessary to confirm the identity of the data subject be provided.

Guidelines 01/2022 of the European Data Protection Board (EDPS) on the right of access[2] state, inter alia, the following as regards the possibility of requesting additional information from a data subject.

Where the controller requests or receives from the data subject additional information necessary to confirm the identity of the data subject, it shall assess each time the information to confirm the identity of the data subject and, where appropriate, ask the requesting person or request the data subject to provide additional identifying data, if proportionate.[3]

[2] Guidelines of the European Data Protection Board (EDPB) on the right of access – Guidelines 01/2022 on data subject rights – Right of access, version 2.0 (adopted definitively on 28 March 2023) (EDPB Guidelines 01/2022).
[3] EDPB Guidelines 01/2022, paragraph 67.

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Where the controller has reasonable grounds to doubt the identity of the requesting person, it may request additional information in order to confirm the identity of the data subject. At the same time, however, the controller must ensure that it does not collect more personal data than is necessary to allow authentication of the requesting person. To that end, the controller must carry out a proportionality assessment taking into account the type of personal data undergoing processing (e.g. special categories of data), the nature of the request, the context in which the request is made and any harm that might result from unlawful disclosure. When assessing proportionality, the need to avoid excessive data collection should be borne in mind while ensuring an adequate level of security of processing.[4]

Assessment of IMY

The right to erasure provided for in Article 17 of the GDPR

Klarna has informed IMY that they have now erased the complainant's data. IMY sees no reason to doubt this reality. IMY notes that Klarna have therefore now complied with the complainant's right to erasure. IMY sees no reason to take any further action on this part.

Did Klarna in accordance with Article 12(6) of the GDPR when they requested up-to-date data from the applicant?

The complainant requested, on several occasions, the erasure of his personal data. On 28 May 2021, the complainant submitted a written request for erasure by means of an online form. On the same day, Klarna's customer services contacted the complainant for additional information in order to verify the complainant's identity in accordance with their identification procedures then in force. However, the complainant did not submit the requested information and, as such, the erasure process did not start. Klarna only initiated the erasure process after IMY's contact. They indicate that they have now reviewed their method of identification. Had the new process for identification been applied at the request on 28 May 2021, the complainant's identity would have been considered to have been verified at that time and the removal process would have been initiated.

The GDPR does not explicitly regulate the data that may be requested or how additional information is collected. However, the principle of data minimisation set out in Article 5(1)(c) of the GDPR is essential in this regard. Even if a controller has reasonable grounds to doubt the identity of the data subject, it must not collect more personal data than is necessary for the identification of the data subject. Simply requiring data for identification purposes, irrespective of their necessity as described in Article 12(6) of the GDPR, is contrary to that provision.

Klarna indicate that they have since reviewed their process for identification. If the new process had been applied at the request on 28 May 2021, the complainant's identity would have been considered to have been verified at that time and the removal process would have been initiated.

In those circumstances, IMY finds that Klarna's request for additional identification data was neither necessary nor proportionate.

[4] EDPB Guidelines 01/2022, paragraph 70.

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Choice of corrective measure

It follows from Article 58(2) and Article 83(2) of the GDPR that IMY is empowered to impose administrative fines in accordance with Article 83. Depending on the circumstances of the case, administrative fines shall be imposed in addition to or instead of the other measures referred to in Article 58(2), such as injunctions and prohibitions. In addition, Article 83(2) specifies the factors to be taken into account in deciding on the imposition of an administrative fine and in determining the amount of that fine. In the case of a minor infringement, IMY may, as indicated in recital 148, instead of imposing an administrative fine, impose a reprimand pursuant to Article 58(2)(b), taking into account aggravating and mitigating circumstances in the particular case, such as the nature, gravity and duration of the infringement, as well as the relevant previous infringements.

IMY notes the following relevant facts. IMY concludes that Klarna requested more data than was necessary to identify the complainant. Klarna has since amended their internal procedures. The complainant's request for erasure was only satisfied after IMY initiated supervision, but this right is now fulfilled. In short, the deficiencies found are of a less serious nature.

In those circumstances, IMY considers that they are minor offences within the meaning of recital 148, which result in a reprimand under Article 58(2)(b) of the GDPR for the infringements found.

Klarna should in accordance with Article 58(2)(b) of the GDPR for infringement of Article 12(6) of the GDPR therefore be imposed a reprimand.

This decision has been taken by Head of Unit [redacted] after presentation by legal advisor [redacted].

Appendix
Personal data of the applicant

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How to appeal

If you wish to appeal the decision, you should write to the Swedish Authority for Privacy Protection (IMY). Indicate in the letter which decision you wish to appeal and the change you are requesting. The appeal must have been received by IMY no later than three weeks from the day you received the decision. If the appeal has been received in time, IMY will then forward it to the Administrative Court in Stockholm for review.

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