COMPLAINANT
See appendix

Swedish ref.:
IMY-2025-7164

Finnish ref:
TSV/5281/2024

IMI case register:
CR 759411

Date:
2026-02-20

Decision regarding a complaint pursuant to the General Data Protection Regulation

Decision of the Swedish Authority for Privacy Protection

The case is closed.

Presentation of the case

The Swedish Authority for Privacy Protection (IMY) has received a complaint from you against NOBA Bank Group AB. The complaint has been submitted to us by the supervisory authority of the country where you lodged your complaint (Finland) in accordance with the provisions of the Regulation on cooperation in cross-border processing. IMY has dealt with the complaint in its capacity as lead supervisory authority under Article 56 GDPR.

In your complaint, you have essentially stated the following. An already regulated debt to Nordax Bank (NOBA Bank Group AB) still exists in the credit information system of the company Suomen Asiakastieto Oy. The incorrect information has led to you not being granted loans from other banks. You have requested rectification and erasure from NOBA Bank Group AB.

In connection with the submission of the complaint, the Finnish data protection authority has provided documents with correspondence between NOBA Bank Group AB and the authority.

Motivation for the decision

IMY shall process complaints about incorrect processing of personal data and, where appropriate, investigate the subject matter of the complaint (Article 57(1)(f) GDPR[1], usually abbreviated GDPR). The CJEU has stated that the supervisory authority must investigate such complaints with due care.[2] Under Section 23 of the Administrative

[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)
[2] Judgment in Schrems II, Case C-311/18, EU:C:2020:559, paragraph 109.

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Procedure Act (2017:900), an authority must ensure that a case is investigated to the extent required by its nature.

It is apparent from the file that you have requested rectification and erasure from NOBA Bank Group AB regarding incorrect information about a debt that was listed with the credit information company Suomen Asiakastieto Oy even though the debt was already settled. It also appears that NOBA Bank Group AB has, following your request, rectified and erased the information from its client list. It appears that the information remained with Suomen Asiakastieto Oy for some time after the request for rectification and erasure due to a system error at NOBA Bank Group AB during a digital transfer of the information from NOBA Bank Group AB to Suomen Asiakastieto Oy. The correct information was later transmitted to Suomen Asiakastieto Oy manually by NOBA Bank Group AB and the debt was removed from Suomen Asiakastieto Oy sometime between 18 June and 5 July 2024.

IMY therefore considers that your request for rectification and erasure has now been satisfied. Against this background, IMY finds no reason to take any further action in the case.

The case should therefore be closed.

[redacted]

Appendix
The complainant’s personal data

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.