

Swedish ref no:
IMY-2024-13112

Nat ref no:
EXP202409074

IMI case register:
689508

Date of the draft decision:
2026-02-26

COMPLAINANT
See appendix

DATA CONTROLLER
Beginner AB

Final decision under the General Data Protection Regulation – Beginner AB

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) finds that Beginner AB (556978-1468) has processed personal data in breach of Article 12.3 of the General Data Protection Regulation (GDPR)¹ by failing to comply with the complainant's request within the time limit laid down in Article 12(3) of the GDPR.

On the basis of Articles 58(2) b and 83 of the GDPR, the Swedish Authority for Privacy Protection issues Beginner AB a reprimand for the established infringement of Article 12(3) of the GDPR.

Presentation of the supervisory case

IMY has initiated supervision regarding Beginner AB (Beginner) due to a complaint against the company. The complaint was transferred from the supervisory authority of the Member State where the complainant lodged his/her complaint (Spain) in accordance with the provisions of the GDPR on cooperation in cross-border processing. IMY has handled the case as responsible supervisory authority for the company's operations pursuant to Article 56 of the GDPR.

The case has been handled through written procedure. Since the complaint relates to cross-border processing, IMY has used the mechanisms for cooperation and consistency regulated in Chapter VII of the GDPR. The supervisory authorities concerned have been the data protection authorities in Spain and Germany.

Below follows a description of the arguments put forward by the complainants and the company in relation to each complaint.

The complainant states, in essence, the following. On 16 march 2024, the complainant turned to Beginner AB to request access. Since the complainant did not receive a reply even though one month had passed, the complainant sent them a reminder on 18 april 2024. The complainants request has not been complied with.

Postal address:
Box 8114
104 20 Stockholm

Website:
www.imy.se

E-mail:
eu@imy.se

Telephone:
08-657 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).

Beginner AB has stated the following. Beginner AB is the data controller for the processing. The request was received in March 2024. On 5 December 2025, a register extract was sent to the complainant by e-mail. The delay was due to internal changes in connection with a change of management and a restructuring of the business. During November 2025, the company has strengthened its procedures and improved its internal handling of rights requests.

Beginner AB has attached documents showing that they have sent a register extract to the complainant on 5 December 2025.

The complainant was given the opportunity to comment on Beginner AB's report but has not returned.

Applicable provisions, etc.

Under Article 15 of the GDPR, a data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed and, if so, access to the personal data and certain information.

According to Article 12(3) of the GDPR: Upon request, the controller shall provide the data subject, without undue delay and in any event no later than one month after receiving the request, information on the measures taken pursuant to Articles 15 to 22. That period may be extended, if necessary, by a further two months, taking into account the complexity of the request and the number of requests received. The controller shall inform the data subject of such an extension within one month of receipt of the request, stating the reasons for the delay.

Assessment of IMY

The investigation shows that the complainant's request for access was met on 5 December 2025, which is more than one month after the request was received. It does not appear that the request was particularly complex. Nor does it appear that Beginner AB informed the complainant of the delay in accordance with Article 12(3) of the GDPR.

IMY notes that Beginner AB has processed personal data in breach of Article 12(3) GDPR by failing to comply with the complainant's request within the time limit laid down in article 12(3) of the GDPR.

Choice of corrective measure

It follows from Article 58(2) and Article 83(2) of the GDPR that the IMY has the power to impose administrative fines pursuant to Article 83 of the GDPR. Depending on the circumstances of the case, administrative fines shall be imposed in addition to or in place of the other measures referred to in Article 58(2), such as injunctions and prohibitions. In addition, it is clear from Article 83(2) which factors must be taken into account when imposing administrative fines and in determining the amount of the fine.

In the case of a minor infringement, the IMY may, as stated in recital 148 of the GDPR, instead of imposing a pecuniary penalty, issue a reprimand pursuant to Article 58(2)(b). Account must be taken of aggravating and mitigating circumstances of the case, such as the nature, severity and duration of the infringement as well as previous relevant infringements.

IMY notes the following relevant circumstances. The case concerns Beginner AB handling of only one individual's request for access to personal data and the infringement has affected only one person. Beginner AB has stated that the company has taken measures to improve their internal handling of GDPR requests. Against that background, IMY considers the infringement to be minor within the meaning of recital 148 and that Beginner AB should be issued a reprimand under Article 58(2)(b) of the GDPR.²

This decision has been made by chief of unit [REDACTED], after presentation by legal advisor [REDACTED]

Appendix

The complainant's personal data

² EDPB Guidelines 04/2022 on the calculation of administrative fines under the GDPR (finally adopted on 24 May 2023).

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.