IMY Swedish Authority for Privacy Protection

COMPLAINANT
See appendix

CONTROLLER
Klarna Bank AB

Swedish ref.:
IMY-2025-12796

German ref:
BlnBDI-222-21-140/2024

IMI case register:
800775

Date:
2026-06-02

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 (IMY) finds that Klarna Bank AB (Klarna), has processed personal data in breach of Article 12.3 of the General Data Protection Regulation (GDPR)[1] by not handling the complainant´s request to access according to article 15 in a timely manner.

IMY issues a reprimand to Klarna Bank AB pursuant to Article 58(2)(b) of the GDPR for the infringement of Article 12.3 of the GDPR.

Presentation of the supervisory case

Handling of the case

IMY has initiated an investigation into Klarna to investigate whether Klarna has handled the complainant's request for access in accordance with Article 15 of the General Data Protection Regulation and whether this has been done within the time limit laid down in Article 12(3) of the GDPR. The assessment in this case concerns the complainant's claim that his request for access has not been granted, and not whether the processing is deficient in general.

The complaint has been transferred from the supervisory authority in the country where the complainant lodged their complaint (Germany) in accordance with the provisions of the Regulation on cooperation in cross-border processing. IMY has handled the complaint in its capacity as the lead supervisory authority pursuant to Article 56 of the General Data Protection Regulation.

The case has been handled through correspondence. Due to the cross-border nature of the supervisory matter, the IMY has made use of the mechanisms for cooperation and consistency set out in Chapter VII of the General Data Protection Regulation. The supervisory authorities concerned have been the data protection authorities in

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[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).

Germany, Denmark, Austria, Italy, Germany, Poland, Finland, the Netherlands and Norway.

Statements by the parties

The complainant has stated that he submitted a request for access to information which Klarna has not complied with. The email correspondence between him and Klarna, which the complainant has submitted in support of his complaint, essentially reveals the following.

On 18 June 2024, the complainant requested that his personal data processed by Klarna be erased. On 1 July 2024, Klarna replied that they had complied with his request to be forgotten in relation to two email addresses. Klarna also informed him that, even after the erasure, the company had a legal basis for processing certain personal data. On 1 July 2024, the complainant replied that he wished to receive information about which of his personal data was still being processed. On 2 July 2024, Klarna informed the complainant of the purposes of the processing of personal data. On 6 July 2024, the complainant clarified that he had requested access to his personal data that was still being processed by Klarna. On 11 July 2024, Klarna confirmed that the complainant's personal data which Klarna was no longer permitted to process had been deleted on 8 July. Klarna informed the complainant that, as a bank, the company had a legal basis for continuing to process certain data. On 19 August 2024, the complainant reiterated that his request concerned not only erasure but also access to information regarding the personal data that was still being processed.

Klarna has stated, in essence, the following. Klarna's customer service team initially failed to formally process the complainant's request for access to personal data. Although the complainant was informed of the reasons for certain data storage, the process for providing a data subject access request was not initiated. Klarna has rectified this. On 11 August 2025, a formal data subject access request was sent by post to the complainant.

The complainant has been given the opportunity to respond to Klarna's reply. He has confirmed that he has received the data subject access request but maintains that the following issues remain:
- Deletion of all his personal data and an explanation of which data cannot be deleted and for what reasons.
- Information regarding to whom his personal data has been or will be disclosed and what compensation Klarna has received for this.
- An explanation that Klarna collects personal data which it does not necessarily need to provide its services (e.g. telephone numbers) and a cessation of this practice.

Klarna has been given the opportunity to respond to the complainant's information. The company has stated that it has reviewed the matter. On 10 December 2025, in accordance with Article 15(1)(c) of the General Data Protection Regulation, the company provided information on the recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations.

The complainant has confirmed that he has received the aforementioned information but maintains that he still lacks information as to why the company collects data that it does not need to provide its services.

Motivation for the decision

Applicable provisions, etc.

It follows from Article 57(1)(f) of the General Data Protection Regulation that the IMY shall handle complaints from data subjects who consider that the processing of personal data relating to them infringes the Regulation. The provision further states that the supervisory authority shall, where appropriate, investigate the subject matter of the complaint and inform the individual within a reasonable time of the progress of the investigation and of the outcome, in particular if further investigations or coordination with another supervisory authority are required. The Court of Justice of the European Union has held that the supervisory authority must investigate such complaints with due care. The supervisory authority has a margin of discretion regarding the choice of appropriate and necessary corrective measures.

It follows from Section 23 of the Administrative Procedure Act (2017:900) that an authority must ensure that a case is investigated to the extent required by its nature.

It follows from Article 15(1) of the General Data Protection Regulation, inter alia, that a data subject has the right to obtain from the controller confirmation as to whether personal data concerning him or her are being processed and, where that is the case, to obtain access to the personal data and the following information:
a) The purposes of the processing.
b) The categories of personal data concerned.
c) The recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations. d) Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.
e) The existence of the right to request from the controller the rectification or erasure of personal data or restrictions on the processing of personal data concerning the data subject, or to object to such processing.
f) The right to lodge a complaint with a supervisory authority.
g) Where the personal data are not collected from the data subject, any available information as to their source.
h) The existence of automated decision-making, including profiling, as referred to in Article 22(1) and (4), in which case, at least in those instances, meaningful information shall be provided regarding the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
Article 15(2) further states that where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards put in place in accordance with Article 46 in connection with the transfer.

Under Article 12(3), the controller shall, upon request, provide the data subject with information regarding the measures taken pursuant to Articles 15 to 22 without undue delay and, in any event, no later than one month after receiving the request. This period may be extended by a further two months where necessary, taking into account the complexity of the request and the number of requests received. The controller shall inform the data subject of any such extension within one month of receipt of the request and shall state the reasons for the delay.

IMY’s assessment

Klarna has informed IMY that on 11 August 2025 the company sent a formal extract from the register to the complainant and, on 10 December 2025, information regarding recipients or categories of recipients to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations. According to Klarna, the company has therefore provided the complainant with access to their data in accordance with Article 15 of the General Data Protection Regulation. The complainant has confirmed this. IMY notes that Klarna has thus now satisfied the complainant’s right of access. Against this background, IMY finds no grounds to take any further action in this part of the case.

The parties agree that the complainant submitted their request for access in July 2024. Klarna has acknowledged that the process for providing a data extract was not initiated at that time, although the complainant was informed of the purposes of certain data storage. According to Klarna, a data extract was sent on 11 August 2025. Further information pursuant to Article 15 of the General Data Protection Regulation was provided on 10 December 2025. IMY notes that the complainant’s request was only fulfilled approximately one and a half years after it was submitted. It is not apparent from the case file that the request was of a particularly complex nature or that Klarna informed the complainant of the delay to justify an extended response time of a total of two months in accordance with Article 12(3) of the General Data Protection Regulation. IMY therefore considers that Klarna has failed to fulfil its obligation under Article 12(3) of the General Data Protection Regulation by not processing the complainant’s request for access under Article 15 in a timely manner.

The complainant has stated that he has not received any explanation as to why Klarna collects personal data which, according to the complainant, the company does not necessarily need in order to provide its services. IMY notes that the authority has discretion to determine, following an assessment of appropriateness, whether or not the matter should be investigated. IMY has initiated a supervisory investigation concerning Articles 12 and 15. The complainant’s assertion that the company collects data it does not need falls outside the scope of this investigation.

Choice of corrective measure

Within the scope of its corrective powers, IMY shall take such measures as are appropriate, necessary and proportionate to ensure compliance with the General Data Protection Regulation.

In the event of infringements of the General Data Protection Regulation, IMY has a number of corrective powers, including reprimands, injunctions and administrative fines. This follows from Article 58(2)(a) to (j) of the GDPR. According to Recital 129 of the GDPR, the IMY shall take such measures as are appropriate, necessary and proportionate to ensure compliance with the GDPR. It follows from Article 58(2)(i) and Article 83(2) of the GDPR that the IMY has the power to impose administrative fines in accordance with Article 83 of the GDPR. In the case of a minor infringement, the IMY may, as set out in recital 148 of the GDPR, issue a reprimand pursuant to Article 58(2)(b) instead of imposing a financial penalty. Account must be taken of aggravating and mitigating circumstances in the case, such as the nature, gravity and duration of the infringement, as well as any relevant previous infringements.

The present supervision concerns Klarna's handling of an individual complainant's request for access. Klarna has failed to fulfil its obligations under Article 12(3) by not handling the complainant's request within the prescribed time limit.

The prescribed time limit of a maximum of one month was exceeded by approximately one and a half years, and the request was only granted after the IMY initiated an investigation. As a mitigating factor, it may be taken into account that the complainant's request has been granted and that, when submitting his request, the complainant was informed of the purposes of certain data storage. It has not emerged that the current shortcoming has had serious consequences for the complainant. The breach is therefore of a less serious nature than if the request had been left unanswered.

Against this background, IMY considers that this constitutes a minor infringement within the meaning of recital 148 of the General Data Protection Regulation, which means that Klarna should be issued with a reprimand pursuant to Article 58(2)(b) of the General Data Protection Regulation.

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

Appendix
The complainant's personal data