

15 June 2026

J.No. 2025-7321-2696

Doc.no. 891498

Caseworker  
[REDACTED]  
[REDACTED]

---

## Your complaint about Pandora A/S

On 11 September 2025, you filed a complaint with the data protection supervisory authority in Hamburg, Germany, regarding Pandora A/S.

On 9 December 2025, the Hamburg supervisory authority submitted your complaint to the other supervisory authorities within the EU/EEA under the cooperation mechanism (One Stop Shop), where a lead supervisory authority competent to deal with the case is to be appointed. On 8 January 2026, the Danish Data Protection Agency declared itself to be the lead supervisory authority in the case, given that Pandora A/S has its headquarters in Denmark.

After reviewing your complaint, the Danish Data Protection Agency understands that you believe that Pandora A/S has not responded adequately to your request pursuant to Article 15 of the GDPR<sup>1</sup> and that Pandora A/S – with reference to Article 12 of the GDPR – refers you to make use of a specific form in order to exercise the right of access.

It is the understanding of the Danish Data Protection Agency that the reason for your complaint is that you are the subject of a personal data breach at Pandora A/S, which the company has notified you of on 5 August 2025.

You have enclosed a copy of the notification and your correspondence with Pandora A/S. It appears from the material that in response to the notification you have asked the company a number of questions regarding both the company's processing of information about you and questions of a general nature about the breach. You have requested answers to your questions with reference to Article 15 of the GDPR on the right of access. However, the Danish Data Protection Agency understands that your complaint can also be read in such a way that you do not believe that you have received sufficient information about the personal data breach pursuant to Article 34(2) of the GDPR.

### The Danish Data Protection Agency has carried out a brief investigation of the case

The Danish Data Protection Agency has taken a closer look at the information you have submitted, and the Danish Data Protection Agency has therefore carried out a brief investigation of the case.

**The Danish Data  
Protection Agency**  
Carl Jacobsens Vej 35  
2500 Valby  
Denmark  
T 3319 3200  
dt@datatilsynet.dk  
datatilsynet.dk  
VAT No. 11883729

---

<sup>1</sup> 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. 5 March 2026.

The Danish Data Protection Agency has decided to forward your complaint with annexes to Pandora A/S and simultaneously draw to Pandora A/S' attention the rules to which your complaint relates. In this way, Pandora A/S will have the opportunity to address your complaint and decide whether the processing is in accordance with the data protection rules.

The above also means that the Danish Data Protection Agency does not initiate a further investigation at this time. This also means that the Danish Data Protection Agency has not taken a position on whether the rules have been violated in your case.

### **Reasons for the Data Protection Agency's decision**

The Danish Data Protection Agency has dealt with the case in accordance with Article 57(1)(f) of the GDPR.

It follows from that provision that the supervisory authority must deal with complaints lodged by a registers court and, to the extent appropriate, examine the subject matter of the complaint. The Danish Data Protection Agency has decided not to conduct a further investigation of the case with a consultation of the controller primarily because it is most appropriate for Pandora A/S to be given the opportunity to take a position on your complaint, rather than for the Danish Data Protection Agency to initiate a further investigation. In connection to this, the Danish Data Protection Agency has carried out an assessment of what could potentially be achieved by initiating a closer investigation of the case, including the extent to which it could help you, or whether such an investigation of your case could generally be suitable for raising the level of data protection. The assessment shall also take into account the use of resources which will be associated with such an examination. These considerations have led the case, after a brief examination, to the above-mentioned result.

The Danish Data Protection Agency has placed particular emphasis on the fact that Pandora A/S is hereby given the opportunity to take a position on your access request and other questions that may arise from, among other things, the company's notification of the personal data breach to you. The Danish Data Protection Agency notes that Pandora A/S does not appear to have stated that it does not wish to respond to your request.

In connection to this, the Danish Data Protection Agency notes that the GDPR contains several provisions stipulating that the controller must provide the data subject with information of different nature. It is, inter alia, Article 15<sup>2</sup> of the GDPR if the data subject requests access, but it may also be by notification under Article 34<sup>3</sup> of the GDPR where the data subject has been the subject of a personal data breach, as is the case here.

In relation to your comments regarding the way in which Pandora A/S facilitates access to your access request, the Danish Data Protection Agency has made Pandora A/S aware of the rules in this regard, among other things, that a controller cannot automatically refrain from replying to access requests sent through a different channel than the previous one for the handling of such requests.<sup>4</sup> The Danish Data Protection Agency has thus placed emphasis on the fact that Pandora A/S is thereby given the opportunity – in addition to addressing your specific access request – to reassess whether the company's general procedures for handling rights requests (e.g. right of access) are in accordance with the data protection rules.

<sup>2</sup> <https://www.datatilsynet.dk/Media/C/0/Registreredes%20rettigheder.pdf> (in particular section 4).

<sup>3</sup> <https://www.datatilsynet.dk/Media/637886298435856391/H%C3%A5ndtering%20af%20brud%20p%C3%A5%20person-datasikkerheden.pdf> (section 4).

<sup>4</sup> The Danish Data Protection Agency can refer, inter alia, to EDPB guidelines 01/2022 on data subject rights – Right of access v. 2.1, which can be found here: [https://www.edpb.europa.eu/system/files/2023-04/edpb\\_guidelines\\_202201\\_data\\_subject\\_rights\\_access\\_v2\\_en.pdf](https://www.edpb.europa.eu/system/files/2023-04/edpb_guidelines_202201_data_subject_rights_access_v2_en.pdf), in particular section 3.1.2, including paragraphs 53-55 and 138.

For more information on the content of the Data Protection Agency's letter to Pandora A/S, please refer to the attached copy of the letter.

### **Closing remarks**

Please note that the Danish Data Protection Agency has not at this time taken a position on whether the Danish Data Protection Agency can or will investigate a possible later inquiry from you about for the matter.

The decisions of the Danish Data Protection Agency cannot be appealed to any other administrative authority, cf. the Danish Data Protection Act<sup>5</sup>, section 30.

However, the decisions of the Danish Data Protection Agency can be brought before the Danish courts, cf. the Danish Constitution, section 63.

Kind regards



---

<sup>5</sup> This is the Danish version: Lovbekendtgørelse nr. 289 af 8. marts 2024 om supplerende bestemmelser til forordning om beskyttelse af fysiske personer i forbindelse med behandling af personoplysninger og om fri udveksling af sådanne oplysninger (databeskyttelsesloven). Unfortunately, there is only an English version of the previous edition. It can be found here <https://www.datatilsynet.dk/media/7753/danish-data-protection-act.pdf> You can also read more here on the English version of the Danish Data Protection Agency's website <https://www.datatilsynet.dk/english>