Swedish Authority for Privacy Protection

COMPLAINANT
See appendix

CONTROLLER
Klarna Bank AB

Swedish ref.:
IMY-2023-14868

AT SA ref no:
D130.1499

IMI case register:
572901

Date:
2026-06-29

Final 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 the investigation in the case does not show that Klarna Bank AB (org. nr. 556737-0431) has failed to comply with Article 15 of the General Data Protection Regulation (GDPR)[1] in the manner alleged in the complaint.

IMY finds that Klarna Bank AB has processed personal data in breach of Article 12(3) of the GDPR by not informing the complainant without undue delay of the outcome of his request for access under Article 15 of the GDPR.

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

IMY has initiated supervision regarding Klarna Bank AB (Klarna) due to a complaint concerning the right to access in the GDPR. The complaint has been submitted to IMY, as lead supervisory authority pursuant to Article 56 of the GDPR. The handover has been made from the supervisory authority of the country where the complaint has been lodged (Austria) in accordance with the provisions of the GDPR on cooperation in cross-border processing.

The case has been handled through written procedure. In light of the complaint relating to cross-border processing, IMY has used the mechanisms for cooperation and consistency contained in Chapter VII of the GDPR. The concerned supervisory authorities have been the data protection authorities in Austria, Ireland, Norway, France, Germany and Italy.

The complainant has essentially stated the following. On 2 January 2023, the complainant requested access to his personal data from Klarna. At the time when the

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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).

complaint was lodged with the Austrian supervisory authority Klarna had not given the complainant access to his personal data, but instead extended the time limit for a response by 90 days. The complainant objects to the reasons for the extension of the time limit. In addition, Klarna has not given the complainant access to all the personal data processed about him.

Klarna has essentially stated the following. Klarna has received the complainant’s request for access. Klarna’s customer service informed the complainant that the time limit for responding had to be extended due to the complexity of the request.
On 13 April 2023, Klarna sent the complainant an extract from the register, together with a list of third parties with whom the personal data had been shared. Klarna has thus complied with the request in accordance with the GDPR. Klarna does not disclose credit ratings in relation to its risk assessments.

On 27 February 2025, the Court of Justice of the European Union delivered its judgment in Case C-203/22 Dun & Bradstreet Austria, in which the court assessed, inter alia, the scope of the right to information under Article 15(1)(h) of the GDPR. In light of this judgment, IMY requested an additional response from Klarna.

Klarna has essentially replied as follows. At the time of Klarna's earlier statement in the case, Klarna's position was that they had no obligation to share information on credit risk assessments. In light of the CJEU judgment, Klarna has re-assessed the complainant’s request and provided an updated explanation of the automated decision-making regarding the relevant point in time prior to the complainant’s request, i.e. January 2023.

The complainant has been given opportunity to respond to Klarna’s latest statement but has not returned.

Motivation for the decision

Applicable provisions, etc.

It follows from Article 57(1)(f) of the GDPR that IMY shall handle complaints from data subjects who consider that their personal data are being processed in breach of the GDPR. The provision further states that IMY shall, where appropriate, examine the subject matter of the complaint. The Court of Justice of the European Union has ruled that the supervisory authority must investigate such complaints with due care.[2] Under Paragraph 23 of the Swedish Administrative Procedure Act (2017:900), an authority must ensure that a case is investigated to the extent required by its nature.

The right to access follows from Article 15 of the GDPR. The provision means that 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, where that is the case, access to the personal data and certain information regarding the processing.

For instance, a data subject has the right to obtain information of the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the

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

significance and the envisaged consequences of such processing for the data subject (Article 15(1)(h) of the GDPR).

According to the Court of Justice of the European Union, Article 15(1)(h) confers a right to require the controller, as ‘meaningful information about the logic involved’, to explain, by means of relevant information and in a concise, transparent, intelligible and easily accessible form, the procedure and principles actually applied in order to use, by automated means, the personal data concerning that person with a view to obtaining a specific result, such as a credit profile.[3]

When a controller receives a request from a data subject pursuant to Article 15 GDPR, the controller shall provide the data subject with information on the action taken without undue delay and in any event no later than one month of receipt of the request (Article 12(3) GDPR). That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

The Swedish Authority for Privacy Protection’s assessment

Compliance with the complainant’s request

As regards the question whether the complainant was granted access in accordance with his request, the following is shown from the investigation in the case. Klarna has stated that the complainant has been provided with an extract from the register and information regarding the sharing of data with third parties. The complainant has not disputed this information, but rather requested further information on the decision-making.

It is apparent from the investigation in the case that the complainant’s personal data has been subject to automated decision-making. IMY concludes that the complainant thus has the right to receive meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing under Article 15(1)(h) of the GDPR. In this context, Klarna has stated that, during the handling of the case at IMY, the complainant has been provided with additional information regarding the automated decision-making. The complainant has been given the opportunity to respond to this but has not returned. IMY therefore finds no reason to question the fact that Klarna provided the complainant with such additional information.

On the basis of an overall assessment, in particular taking into account the fact that the complainant has not returned, IMY considers that it has not been shown that Klarna has failed to comply with Article 15 of the GDPR as alleged in the complaint. IMY will therefore not take any further action in this regard.

Satisfactory handling of the complainant’s request

As regards the handling of the complainant’s request, the following is shown from the investigation in the case. On 2 January 2023, Klarna received the complainant’s request for access. Klarna informed the complainant, within one month, of the extension of the deadline, citing the complexity of the request as reason for the extension. On 13 April 2023, Klarna replied to the complainant’s request. During the

[3] CJEU, Dun & Bradstreet Austria, Case C-203/22, paragraph 66.

handling of the case at IMY, Klarna provided the complainant with additional information.

IMY finds no reason to question that Klarna had reason to extend the time limit for handling the complainant’s request due to its complexity. Furthermore, IMY considers that Klarna had reason to provide certain information to the complainant during the handling of the case at IMY, in light of new practice in the field. However, IMY notes that in order to maintain the extended deadline of three months, Klarna should have provided the complainant access to the other data by 2 April 2023. In view of the fact that this data was provided on 13 April 2023, IMY considers that Klarna did not comply with the prescribed deadline.

IMY therefore considers that Klarna has processed the complainant’s personal data in breach of Article 12(3) of the GDPR by not informing the complainant without undue delay, and at the latest within three months, of the outcome of his request for access under Article 15 of the GDPR.

Choice of corrective measure

Pursuant to Article 58(2)(i) and Article 83(2) of the GDPR, IMY has the power 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 the case of a minor infringement, IMY may, as stated in recital 148, instead of imposing a fine, issue a reprimand pursuant to Article 58(2)(b). Aggravating and mitigating circumstances of the case need to be taken into consideration. These could include the nature, gravity and duration of the infringement as well as past infringements of relevance.

When assessing the choice of corrective measure, IMY takes the following into account. Klarna has handled the complainant’s request for access in breach of Article 12(3) of the GDPR. As far as the investigation shows, the complainant received access to his personal data before IMY initiated this supervisory case. Furthermore, it appears that the additional information provided to the complainant during the handling of the case at IMY was provided in light of new practice in the field. Also, the infringement in question concerns one data subject in an individual case. On the basis of an overall assessment, IMY concludes that this is a minor infringement within the meaning of recital 148 of the GDPR. Klarna should therefore be given a reprimand for the infringement.

[redacted]

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

Appendix
The complainant’s personal data

Copy to
Data protection officer

How to appeal

If you wish to appeal IMY:s decision, please write to IMY. Please indicate in your letter the decision you wish to appeal and the amendment that you are requesting. The appeal must reach IMY no later than three weeks from the date on which you received the decision. If the appeal has been received in due time, IMY will forward it to the Administrative Court in Stockholm for assessment.

You can send the appeal by email to IMY if the appeal does not contain any sensitive personal data or information that may be subject to confidentiality. IMY:s contact details are set out on the first page of the decision.