THE COMPLAINANT
See appendix

CONTROLLER
Klarna Bank AB

Swedish reference number:
IMY-2024-3496

German ref:
521.17280

IMI case register:
568172

Date:
2026-07-09

Final decision pursuant to Article 60 under the General Data Protection Regulation following supervision – Klarna Bank AB

Decision of the Swedish Authority for Privacy Protection

The Swedish Authority for Privacy Protection (IMY) finds that Klarna Bank AB (556737-0431) in their handling of the complainant's request for access of 29 March 2023, has processed personal data in violation of the following provisions:

- Articles 12(1), 15(1) and 15(3) of the General Data Protection Regulation (GDPR), [1] in that Klarna did not provide all of the complainant's personal data in a concise, transparent, easy accessible form, using clear and plain language, and
- Article 12(3) of the GDPR in that certain personal data have been provided too late.

IMY issues a reprimand to Klarna under Article 58(2)(b) of the GDPR for the infringements.

Presentation of the supervisory case

The processing of the case

IMY has initiated supervision regarding Klarna due to a complaint. 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 (Germany) in accordance with the provisions of the GDPR on cooperation in cross-border processing.

The supervision was initiated to examine whether the complainant's request for access was properly dealt with under Articles 12 and 15 of the GDPR. The investigation in the

Postal address:
Box 8114
104 20 Stockholm

Website:
www.imy.se

Email:
imy@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).

case concerns what the complainant has stated about access to information in one case and not weather the company's processing is generally deficient.

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 Germany, Austria, Denmark, Ireland, Hungary, France, Spain, Italy, Luxembourg, the Netherlands, Norway, Belgium and Finland.

IMY has communicated Klarna's response to the complaint via the relevant national supervisory authority in the country where the complainant lodged the complaint. The complainant subsequently returned with comments on Klarna's reply, on which the company then submitted its opinion on.

The complainant's statement

The complainant has essentially stated the following. On 29 March 2023, the complainant requested access to certain information regarding personal data in connection with a purchase. It is clear from the complainant's request that the information requested is primarily linked to a specific purchase made by the complainant on 5 December 2022. The complainant received an extract from the register from Klarna which does not clearly indicate which information was related to the requested purchase. No information about the requested purchase was provided in the received extract from the register. The complainant requested the data again and one of the answers received on 3 May 2023, which contained a specification of the various organisations with which Klarna had shared the complainant's personal data, was written in English rather than in German. By switching to English, Klarna did not provide the information in a clear and simple language and in an intelligible form. That Klarna offered to translate the information into another language was also written in English, not in German. The complainant also stated that a translation would take further time, which, as the one-month deadline had already been exceeded, is not acceptable.

The request was not complied with within the stipulated time limit. The information provided on 12 April 2023 does not correspond to what was requested by the complainant. Certain technical data relating to the purchase was only communicated to the complainant after 21 February 2025 and only after the matter was referred to the supervisory authority.

The company's statement

Klarna has essentially stated the following. On 29 March 2023 the complainant submitted a request for access and on 12 April 2023 Klarna provided an extract of the personal data stored in relation to all previous purchases made with Klarna. Klarna's first response in the event of a data subject access is always to provide the data which the data subjects usually wish to receive.

Klarna takes into account the amount and complexity of the personal data processed when providing extracts from registers and therefore use a layered approach. The register extract contains clear instructions on how to request further information.

On the same day as the register extract was sent, the complainant replied by repeating the request for a copy of the personal data retained regarding the specific purchase in question. On 3 May 2023, Klarna sent information to the complainant, in English, on specific third parties recipients with whom the complainant's personal data were generally shared (and not limited to the specific purchase). Klarna provides documents in other languages upon request. On 3 May 2023, Klarna also confirmed, by a separate e-mail, that no personal data relating to the specific purchase was stored in Klarna's system in relation to the e-mail address specified, which also is evident from the section relating to purchases of the register extract.

After examining the case in more detail when IMY contacted Klarna on 9 January 2025, Klarna discovered that certain technical data relating to the complainant's purchase, namely the timestamps of the purchase session, was missing from the register extract. Consequently, Klarna promptly contacted the complainant with the information from the technical session in order to fulfil the request for access. Klarna concedes that the company failed to provide certain technical data within the stipulated timeframe, since the data were not connected to the complainant's account with Klarna.

Motivation for the decision

Applicable regulations, etc.

Article 57(1)(f) of the GDPR stipulates that IMY shall handle complaints from data subjects who consider that their personal data are being processed in breach of the Regulation. The provision further stipulates that IMY shall, where appropriate, investigate the matter to which the complaint relates. The Court of Justice of the European Union has stated that the supervisory authority shall investigate such complaints with due care.[2]

Article 15(1) of the GDPR stipulates that the 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 to certain specified information relating to the data.

Article 15(3) of the GDPR states that the controller is to provide the data subject with a copy of the personal data undergoing processing.

Article 12(1) of the GDPR stipulates that the controller shall take appropriate measures to provide any communication to the data subject under Article 15 to 22 and 34 in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

According to Article 12(2) of the GDPR, the controller shall facilitate the exercise of the data subject's rights in accordance with Articles 15 to 22.

Article 12(3) states the following. The controller shall, upon request, provide the data subject with information on the measures taken pursuant to Articles 15 to 22 without undue delay and in any event within one month of receiving the request. That 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

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

inform the data subject of any such extension within one month of receipt of the request and give reasons for the delay.

Assessment

The complainant submitted the request for access on 29 March 2023. The investigation in the case shows that the request has been replied to on three occasions. It was not until 21 February 2025 that the request was fully complied with. Klarna therefore processed the complainant's personal data in breach of Article 12(3) GDPR.

IMY also notes that the summary of personal data provided to the complainant under Article 15 of the GDPR on 12 April 2023 was general and did not correspond to the requested information. Therefore, Klarna did not take measures to adapt the information to the specific situation of the data subject. It should be noted that, under Article 12(2) of the GDPR, the controller has an obligation to facilitate the exercise of the data subject's rights. The data subject cannot be required to return on several occasions to the controller in order to access all of the personal data.

Subsequently, on 3 May 2023, the company's information was provided in English instead of in German, even though the complainant approached Klarna in Germany and all the communication was conducted in German up until this point. IMY considers that it follows from the purpose of the right of access and from the requirements under Article 12(1) of the GDPR that data subjects must be able to obtain information in a language they know, at least when the controller directs its activities to countries where that language is an official language.[3] Moreover, according to IMY's assessment, providing information in English and offering a translation into local languages does not meet the obligation to provide all communication to the data subject pursuant to Article 15 of the GDPR in a clear manner as stipulated in Article 12(1) of the GDPR. In an overall assessment, IMY considers that the above circumstances constitute a breach of Klarna's obligations to provide personal data in a concise, transparent, easy accessible form, using clear and plain language under Article 12(1) 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. Furthermore, Article 83(2) determines the factors to be considered when imposing administrative fines and when determining the amount of the fine. 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.

IMY notes the following relevant facts for the choice of corrective measure. The prescribed time limit of one month has been exceeded by a remarkably long time – by

[3] See the Art. 29 Working Party Guidelines on transparency under Regulation (EU) 2016/679, WP260rev.01, adopted by the EDPB, paragraph 13, and the EDPB Guidelines 01/2022 on data subject rights – Right of access, version 2.1 (finally adopted on 23 March 2023), paragraph 142.

more than 1 years and 9 months. Klarna has also failed to meet the requirement of clear information in the processing of the request. However, the investigation is based on an individual complaint and concerns shortcomings in the processing of data relating to one individual data subject. There was no processing of sensitive personal data.

In an overall assessment of the above circumstances, IMY considers that this is a minor infringement within the meaning of recital 148 GDPR. In the light of the above, IMY considers that a reprimand is an appropriate, necessary and proportionate measure for the infringements in question. A reprimand should therefore be issued to the company under Article 58(2)(b) of the GDPR.

___

This final decision has been made by Head of Unit [redacted] after presentation by legal advisor [redacted]. Legal advisor [redacted] has also participated during the processing of this case.

[redacted]

Appendix
The complainant's personal data

Copy to
Data protection officer

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.