

[REDACTED]

Paris, on March 20, 2026

[REDACTED]

Sir,

You have lodged a complaint with the Commission nationale de l'informatique et des libertés (CNIL) concerning the processing of your personal data by [REDACTED]

In support of your complaint, you stated that [REDACTED] would collect information relating to your purchases, which, in your view, would not be necessary in the context of the granting of credit.

You also indicated that [REDACTED] would not have informed you of this collection, and that you would not have been offered any possibility to rectify, delete or manage your personal data. In that regard, you stated that, if you did not agree to the collection of that information by the company, you could not use its services.

Finally, you stated that you sent an email to [REDACTED] asking it to change its system so as to no longer collect information which is not essential for the granting of credit. However, no answer has been given to you.

As you are aware, pursuant to the OSS mechanisms between authorities provided for in the General Data Protection Regulation (GDPR), the CNIL has forwarded your complaint to the Swedish data protection authority in so far as [REDACTED] is established in Sweden and falls within the competence of that authority.

Pursuant to Article 77 of the General Data Protection Regulation (GDPR), I am informing you of the decision adopted in this case by the Swedish Data Protection Authority, following this cooperation procedure.

The Swedish authority stated that it had intervened with [REDACTED] and that it had given you the opportunity to comment on the company's replies.

As regards the collection of personal data by [REDACTED] in the context of the granting of credit, the company informed the Swedish authority that purchase information is generally not used to assess creditworthiness (except for the amount of the transaction), but to prevent fraud, money laundering and terrorist financing, as set out in the company's privacy policy.

As regards [REDACTED] failure to reply to your request to change its system, [REDACTED] informed the Swedish authority that you did not use its services or contact [REDACTED] to exercise your rights.

In this connection, I would remind you that, in accordance with Article 12.2 of *the GDPR*, *'the controller shall facilitate the exercise of the rights conferred on the data subject under Articles 15 to 22. In the cases referred to in Article 11(2), the controller shall not refuse to comply with the data subject's request to exercise his or her rights under Articles 15 to 22, unless the controller demonstrates that he or she is unable to identify the data subject.'*

In the present case, in the absence of any exercise of rights, [REDACTED] was not required to provide you with an answer.

Finally, as regards the lack of information on the processing of your personal data, the Swedish authority stated that [REDACTED] provided the required information in accordance with Article 13 of the GDPR in its privacy policy [REDACTED]

In the light of those factors, **the Swedish authority considered that additional investigative measures would not be appropriate or proportionate in the light of the nature of the case.**

In view of these factors, and of the fact **that it is not apparent from the investigations carried out by the Swedish authority that [REDACTED] has failed to fulfil its obligations under the GDPR, I would like to inform you that, in agreement with the European Data Protection Authorities, your complaint has been rejected.**

Please accept, Sir, my distinguished greetings.

[REDACTED]

[REDACTED]

[REDACTED]

Subject to the applicants' interest in bringing proceedings, CNIL decisions may be appealed to the Conseil d'État (Council of State) within two months of their notification, plus: one month for persons who remain in Guadeloupe, French Guiana, Martinique, Réunion, Saint-Barthélemy, Saint-Martin, Mayotte, Saint-Pierre-et-Miquelon, French Polynesia, the Wallis and Futuna Islands, New Caledonia and the French Southern and Antarctic Territories; two months for persons who remain abroad.