

Paris, June 3, 2026

Dear Sir/Madam,

You have submitted a complaint to the Commission nationale de l'informatique et des libertés (CNIL) concerning the difficulties encountered in exercising your right to erasure of your personal data held by the company [REDACTED].

In support of your complaint, you stated that you had received unsolicited communications from the services of [REDACTED]. Following these communications, you contacted the company on 17 December 2024 at the email address [REDACTED] in order to request the deletion of your data, in so far as you state that you have not opened an account with the company and that you suspect fraud.

The company [REDACTED] indicated on the same day that it needed more information to reply to your request, including your surname, first name, date of birth and email address used to place the order with the company.

As you know, pursuant to the mechanisms for cooperation between authorities provided for in the General Data Protection Regulation (GDPR), the CNIL forwarded your complaint to the Swedish Authority for the Protection of Privacy (Integritetsskyddsmyndigheten or IMY), which is competent to deal with requests in connection with the company [REDACTED] in so far as the latter is established in Sweden.

Pursuant to Article 77 of the General Data Protection Regulation (GDPR), I hereby inform you of the decision taken in this case, following this cooperation procedure.

As part of the investigation of your complaint, IMY interviewed [REDACTED]

I would like to inform you that Article 12(6) of the General Data Protection Regulation (GDPR) provides that where the controller has reasonable doubts as to the identity of the natural person making a request for erasure, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

In that regard, the IMY stated that the concept of 'reasonable doubts' within the meaning of Article 12(6) of the GDPR must be assessed in the light of the specific circumstances of each case

and in the light of the information provided in the context of the request, in particular in situations where the controller does not have detailed information about that person.

IMY clarified that, as a general rule, the more sensitive the processing of personal data, the higher the information requirements must be.

Specifically with regard to your situation, IMY stated that it appeared that your email requesting the exercise of rights did not allow you to be identified in its files. However, given the nature of the data it processes, it was necessary for the company to be provided with information enabling you to be identified in order to process your request.

IMY notes that it does not appear from the attachments to your referral that you have provided the information in question.

In view of the above, IMY considers that there is no reason to question the fact that [REDACTED] [REDACTED] had reasonable doubts about your identity when receiving your request.

In view of the above, and of the fact that [REDACTED] request for additional information necessary to confirm your identity appears to comply with the requirements of Article 12 of the GDPR, I would like to inform you that, in agreement with the European Data Protection Authorities, **your complaint has been rejected.**

I have the honour to be, yours faithfully,

[REDACTED]

Subject to the applicants' interest in bringing proceedings, the CNIL's decisions may be the subject of an action before the Conseil d'État (Council of State) within two months of their notification, increased by: one month for persons staying 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 staying abroad.