



REPUBLIC OF ESTONIA
DATA PROTECTION INSPECTORATE

ERAEU KAITSE JA RIIGI LÄBIPAISTVUSE EEST

/*FOR INTERNAL USE

Holder of information: Data Protection Inspectorate

Notation made: 11.11.2025

The access restriction shall be valid until: 11.11.2100,

Legal ground: AvTS § 35 lg 1 p 12, AvTS § 35 lg 1 p 2 *

Re p 2 – until entry into force of the Final Decision

SA Lithuania

Ours 11.11.2025 nr 2.1-12/25/1231-2628-3

Article 60 (8) Final Decision

Dismissal of a Complaint

Estonian Data Protection Inspectorate (DPI) received a complaint via the cross-border procedure system from a Lithuanian citizen [REDACTED] (the Complainant), stating that [REDACTED] (the Controller, [REDACTED]) has blocked his account and despite multiple requests refuses to correct the data, provide data for review/correction or allow to delete his account. The Complainant requests to correct his data to enable the account to be activated or alternatively delete the account completely.

Since [REDACTED] is an Estonian company whose management board is in Estonia and all decisions concerning data processing are adopted in Estonia, DPI agreed to be the lead supervisory authority in the case on 25 Aug. 2025.

Circumstances

While investigating the complaint, DPI found out that there were no supporting evidence attached to the complaint. DPI informed Lithuanian State Data Protection Inspectorate of this matter on 27 Aug. 2025 (via IMI, Art 61 Mutual Assistance Request nr 819305) stating that the complaint is with deficiencies:

The Complainant states that his GDPR Art 15,16,17 rights are not met, however there is no supportive evidence to prove that. Complainant states that [REDACTED] has refused to fulfil his request on 31.07.2025 and 01.08.2025, however no such e-mails are added to this complaint. In the sms-s [REDACTED] has said to the Complainant that the answer was given to him in support section - Complainant has not added this answer to the complaint. Furthermore it remains unclear what kind of data exactly does the Complainant request to be corrected (GDPR art 16) - there is no information about it in the complaint.

- 1. Please provide [REDACTED]'s replies (31.07.2025 and 01.08.2025) to the Complainant that state that [REDACTED] has refused to fulfil all of the Complainant's art 15,16,17 requests.*
- 2. Please provide [REDACTED]'s reply to the Complainant given to him in support section (that [REDACTED] mentions in chat).*
- 3. Please advise what personal data exactly is incorrect and needs to be corrected (GDPR art 16).*

DPI sent a reminder to Lithuanian State Data Protection Inspectorate on 19. Sept. 2025.

On 24. Sept. 2025 Lithuanian State Data Protection Inspectorate replied and forwarded the

response received from the Complainant on 22. Sept. 2025 (Inspection reg. No. 1R-6353). Complainant states in his reply that [REDACTED] did not respond to his questions and requests for justification so there are no more evidence to prove that they refused to fulfil his requests: *[REDACTED] never responded to my inquiries and prevented me from using [REDACTED]'s services for at least two years without providing any explanation or opportunity to correct the allegedly inaccurate data they had.* Complainant also states that *[REDACTED] has confirmed that the account would be deleted on 15 September this year.* The Complainant would kindly request for the DPI to carry out a background check on [REDACTED] to ensure that such misuse of personal data collected by [REDACTED] does not occur in the future.

On 3. October 2025 Lithuanian State Data Protection Inspectorate has sent an Art 61 Voluntary Mutual Assistance Request (nr 832604) to DPI asking to indicate what actions were taken when examining the complaint (IMI No. 814211)

Estonian Data Protection Inspectorate's opinion

DPI would like to point out that any individual may submit a complaint to protect their own subjective rights and cannot request the DPI to carry out an overall background check of the Controller to prevent them from commencing further violations. The main objective of supervisory proceedings that DPI usually conducts on the basis of an individual's complaint is to identify a violation of GDPR and, if such violation has occurred, to ensure that it is brought to an end. Merely establishing the facts of a previous violation is therefore not an independent goal that the supervisory procedure should fulfill.

In this case, the Complainant requested for the Controller to correct his data or alternatively delete his account completely. The Complainant has confirmed that his request was actually met by the Controller and that his account would be deleted on 15. Sept. 2025.

Based on that, DPI considers it sufficiently proven that the violation of Complainant's rights has ceased, and thus the objective of the possible supervisory procedures has already been achieved. Since DPI was awaiting for the elimination of deficiencies of this complaint, no supervisory measures were taken against the Controller in the course of this investigation.

Taking the above into account, Estonian Data Protection Inspectorate will dismiss this complaint under GDPR Art 60 (8), since the Complainant's request to delete his data has been satisfied before any supervisory measures were taken.

This notice of termination of the supervision proceedings can be challenged within 30 days by submitting an appeal to the administrative court under the Code of Administrative Court Procedure.¹

Respectfully

[REDACTED]

lawyer
authorized by Director General

¹ [Code of Administrative Court Procedure–Riigi Teataja](#)