

LEA BANK ASA
Holbergs gate 21
0166 OSLO

Deres referanse

Vår referanse
24/01427-11

Dato
19.08.2024

Sui Generis Decision - LEA Bank ASA

On 1 April 2024, the Spanish Agency for Data Protection (“Agencia Española de Protección de Datos”, “ES SA”) shared with the Norwegian Data Protection Authority (“Datatilsynet”, “us”, “our”) a complaint lodged by [REDACTED] (“complainant”) against LEA Bank ASA (“LEA Bank”, “bank”, “controller”).

The complainant argued that on 21 November 2023 he contacted LEA Bank to essentially obtain the deletion of the personal data he submitted to the bank in connection with a request for a loan that LEA Bank rejected. However, according to the complainant, he received no response from LEA Bank.

Further to our inquiry, LEA Bank acknowledged that they have received a request for a loan from the complainant on 21 November 2023, but they do not seem to have received the request concerning the complainant’s personal data.

In any event, LEA Bank informed us that their internal routines and policies provide for the automatic deletion of the personal data submitted in connection with requests for a loan that LEA Bank has rejected. LEA Bank has confirmed that the complainant’s personal data have been deleted as part of this standard process.

Taking into account that the automatic erasure of the complainant’s personal data has essentially mooted the issues raised in the complaint, that supervisory authorities «should seek an amicable settlement with the controller» (Rec. 131 GDPR), and that on 11 July 2024 the ES SA has informed the complainant of the above without receiving any objections regarding the closure of the case, we consider that the subject matter of the complaint has been investigated to the extent appropriate in accordance with Article 57(1)(f) GDPR, and that the matter may be deemed to be resolved to the complainant’s satisfaction. We have therefore decided to close the present case in accordance with Article 60(7) GDPR and the requirements of Internal EDPB Document 06/2021 on the practical implementation of amicable settlements (adopted on 18 November 2021).

Pursuant to Article 60(3) GDPR, a draft of the present decision was shared with the supervisory authorities concerned, which did not raise any objections.

Kind regards

Tobias Judin
Head of International

Luca Tosoni
Specialist Director

Dokumentet er elektronisk godkjent og har derfor ingen håndskrevne signaturer

Kopi til: Supervisory Authorities Concerned