

BRANDSDAL GROUP AS  
Postboks 8104  
4675 KRISTIANSAND S

*Exempt from public disclosure:  
Offl. § 13, jf. personopplysningsloven § 24 første ledd 2.  
punktum*

Your reference

Our reference  
20/02313-9

Date  
14.02.2024

## **Closure of case – Brandsdal Group AS**

### **I. Introduction**

On 5 March 2020, the Finnish Data Protection Authority (“Tietosuojavaltuutetun Toimisto”, “Finnish SA”) transferred a complaint to the Norwegian Data Protection Authority (“Datatilsynet”, “we”, “our”). The complaint was lodged by [REDACTED] (“the complainant”) against Brandsdal Group AS (“Brandsdal Group”). Brandsdal Group is a Norwegian e-commerce company that operates the website [www.cocopanda.fi](http://www.cocopanda.fi) (“Cocopanda”).

### **II. Factual background – the complaint**

The complainant stated that Cocopanda cancelled her order due to suspicion of fraud. In order for the complainant to regain access to her account, Cocopanda asked her to verify her identity by sending a picture of her ID card via unencrypted email. The complainant did not consider this a secure way to verify her identity. Furthermore, the complainant requested Cocopanda to erase her personal data pursuant to Article 17 GDPR. The complainant claims that Cocopanda did not comply with her erasure request.

### **III. Inquiry by the Norwegian Data Protection Authority**

On 18 May 2020, the Norwegian Data Protection Authority sent an order to provide information to Brandsdal Group, inquiring about the issues brought up in the complaint. In their response, Brandsdal Group stated that they do not require customers to verify their identity by sending a picture of their ID cards via unencrypted email – there are alternate ways to upload this verification if the customer views email as an unsecure channel of communication. Furthermore, Brandsdal Group stated that they did not reject the complainant’s request for erasure. This fact was also communicated to the Finnish SA.

#### **IV. Closure of case**

On 18 December 2023, we asked the Finnish SA to forward a letter to the complainant. The letter informed the complainant about the delay in our processing of the complaint due to a lack of resources. On 21 December 2023, the Finnish SA informed us that they had forwarded the letter to the complainant and received a response. The complainant stated that she has settled the case with Cocopanda.

Taking into account that the complainant has settled the case with the controller, effectively mooted the issues raised in the complaint, and that the complainant did not express any wish to pursue the matter further, we consider that the matter has been resolved to the complainant's satisfaction and will close the case.

In light of the above, 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.

Kind regards

Tobias Judin  
Head of Section

Trine Smedbold  
Senior Legal Adviser

*This letter has electronic approval and is therefore not signed*