

Police report

Danske Bank is recommended for a fine

Date: 05-04-2022

Decision

Private companies

Police report

Supervision / self-management case

Basic principles

The Danish Data Protection Authority assesses that Danske Bank has not been able to document that they have deleted personal data in accordance with the data protection rules, and the Danish Data Protection Authority has therefore recommended a fine of DKK 10 million. DKK

The Danish Data Protection Authority has reported Danske Bank to the police and fined the bank DKK 10 million. DKK. This is in continuation of the fact that in November 2020 the supervisory authority initiated a case of its own initiative, after the bank itself had stated that they had identified a problem with the deletion of personal data, which there was not necessarily a business justification for continuing to process .

In connection with the Danish Data Protection Authority's investigation, it has emerged that the bank has not been able to document in more than 400 systems that rules were laid down for the deletion and storage of personal data, or that manual deletion of personal data was carried out. In these systems, personal data on several million people is processed.

"One of the basic principles of the GDPR is that you may only process information that you need - and when you no longer need it, it must be deleted. When it comes to an organization the size of Danske Bank, which has many and complex systems, it is particularly crucial that you can also document that the deletion actually takes place," says Kenni Elm Olsen, specialist consultant at the Danish Data Protection Authority.

Why report to the police?

The Danish Data Protection Authority always makes a concrete assessment of the seriousness of the case pursuant to Article 83, paragraph 1 of the Data Protection Regulation. 2, when assessing which sanction is the correct one in the opinion of the supervisory authority.

When assessing that a fine should be imposed, the Danish Data Protection Authority has emphasized that the breach that occurred relates to a fundamental principle for the processing of personal data and affects a very large number of registered persons.

In its proposal for the size of the fine, the Danish Data Protection Authority has, among other things, emphasized the nature and seriousness of the infringement and the regulation's requirement that a fine in each individual case must be effective, proportionate to the infringement and have a deterrent effect.

Furthermore, it has been concluded that Danske Bank has continuously worked to be able to document that the bank lives up to its obligations, i.e. have tried to limit the harm that data subjects may potentially suffer. At the same time, the Danish Data Protection Authority has emphasized Danske Bank's active participation in the disclosure of the case.

Do you want to know more?

[Read more about deletion.](#)

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