

Gyldendal is recommended for a fine

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Decision

Private companies

Police report

Supervision / self-management case

Basic principles

The Danish Data Protection Authority reports Gyldendal to the police and recommends a fine of DKK 1,000,000 for keeping information on 685,000 book club members longer than necessary.

On the basis of an inspection visit to Gyldendal A/S, the Danish Data Protection Authority reported the company to the police and proposed a fine of DKK 1,000,000. During the inspection visit, it emerged that information about approx. 685,000 registered members of Gyldendal's book clubs were stored for longer than was necessary.

Instead of deleting information about deregistered members of the book clubs, Gyldendal stored the information in a so-called "passive database". Information about approx. 395,000 of the former members had been stored for more than 10 years after they had opted out of the book clubs. Gyldendal had no procedures or guidelines for deleting information in the passive database.

After the supervisory visit, Gyldendal deleted all the information in the passive database and informed the Danish Data Protection Authority that, in the company's assessment, it would be necessary to store information about deregistered members for up to six years.

"One of the very basic principles is that you should not store people's information for longer than is necessary. In this case, we believe that a fine is appropriate because it concerns a great many Danes' information that has been stored without any objective purpose for a very long time," explains Ditte Yde Amsnæs, head of office at the Data Protection Authority.

Why report to the police?

The Norwegian Data Protection Authority always makes a concrete assessment of the seriousness of the case in accordance with the regulation's article 83, subsection 2, when assessing which sanction is, in the opinion of the supervisory authority, the most appropriate.

In assessing that a fine should be imposed, the Danish Data Protection Authority has emphasized that the breach relates to two basic principles for the processing of personal data – the principles of "storage limitation" and "responsibility" – and affects a very large number of data subjects. The Danish Data Protection Authority has also emphasized that this is not a single error, but a fundamental problem. Furthermore, the Danish Data Protection Authority has emphasized that, in the opinion of the Danish Data Protection Authority, the violation was committed intentionally.

In a mitigating direction, the Data Protection Authority has, among other things, emphasis was placed on the fact that Gyldendal had acted extremely cooperatively and that, according to Gyldendal, there were only two employees who had access to the passive database.

Do you want to know more about the rules?

[Read more about the basic principles.](#)

[Read more about deletion.](#)

Press inquiries about the case can be directed to communications consultant Anders Due on tel. 29 49 32 83.