GDPR access requests and download tools: the EUR 11 million Tinder decision

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Short answer: a GDPR access request download tool must give people a complete copy of their personal data if it is presented as the way to get one, and Ireland's Data Protection Commission fined MTCH Technology Services EUR 11 million over Tinder's tool, as reported by the European Data Protection Board on 17 November 2026. The final decision is dated 13 November. It matters because many services answer access requests through similar self-service exports.

TL;DR The short version

- Ireland's Data Protection Commission fined MTCH Technology Services EUR 11 million over Tinder's data download tool, in a decision dated 13 November 2026.
- A download tool presented as the way to get your data must give a complete copy of personal data.
- Services that answer access requests through self-service exports should audit them for completeness.

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What is the decision about?

Article 15 of the General Data Protection Regulation gives individuals a right of access, and Article 15(3) requires a copy of the personal data undergoing processing. The Irish authority, acting as lead supervisory authority, opened an inquiry on its own initiative in January 2020 into Tinder's Download My Data tool.

What the authority found

- The tool was presented as a way to obtain a copy of Tinder data.
- It did not provide all of the user's personal data.
- Some categories were left out without notice, or given only in summary.
- The data supplied through the tool did not meet the requirements of the right of access.
- MTCH infringed Article 15(3) by failing to provide a copy where it described the automated tool as the means to request one without making its gaps clear.

What is new for practitioners

The summary focuses on how the tool was presented. Offering an automated export is not the problem. Describing it as the route to a copy while it omits data, without saying so, is what the decision identifies.

Sanctions reported by the source

- Administrative fines totalling EUR 11 million.
- An order to bring processing into compliance within three months.

Limitations and open questions

- We read the European Data Protection Board summary, not the full decision.
- The summary does not list the omitted categories or explain how the fine was calculated.
- Appeals or judicial review are possible and the summary does not address them.
- This is not legal advice.

Sources were read on 27 November 2026. Products, rules and data change, so check the linked originals before you rely on any detail.

How to audit a self-service export

1. Build the list of personal data categories from the record of processing and the actual systems.
2. Compare a real test export with that list.
3. For each gap, either add the data or record the legal ground for withholding it.
4. Tell users plainly what the tool does not include and how to ask for the rest.
5. Replace summaries where a copy is required.
6. Retest after every new feature or data source, and keep the results.

What it means for privacy lawyers

Review the words on the button and help page as closely as the export file. Ask engineering for evidence, not assurances, that new data stores flow into access responses. Employment contexts raise related questions, as in the former employee email access case.

Frequently asked questions

- **Can a GDPR access request be met with a download tool?** A tool can help, but if presented as the route to a copy it must not silently omit personal data.
- **How large was the Tinder fine?** EUR 11 million in total.
- **Which article was infringed?** Article 15(3) GDPR.
- **What else was ordered?** Compliance within three months.

Related reading

- Former employee email and access request fine
- Onward transfers and model clauses
- Conversational RAG privacy leakage
- Certified Technical Practitioner

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Sources and further reading

1. European Data Protection Board (national news). Irish Data Protection Commission fines MTCH EUR 11 million following Inquiry into Tinder users' personal data requests. 17 November 2026. edpb.europa.eu/news/irish-data-protection-commission-fines-mtch-eur-11-million-following-inquiry-into-tinder-users_en

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