Trumo Finance Oy

Privacy Notice

(21.10.2026)

Trumo Finance is a payment service provider and in course of processing payments, we gather personal data necessary for the provision and use of the service.

Trumo Finance Oy ("Trumo") is a Finnish legal entity with business ID: 3107623-5 and registered address at Yrjönkatu 11 D 20, 00100 Helsinki, Finland. Trumo's Data Protection Officer can be contacted at dpo(at)trumo.com

1. Categories of personal data collected

We collect and process the following personal data when using the strong authentication to execute the payment:

- Name, date of birth, and personal identification number.
- In some cases, the residential address is needed for identity verification, and this we collect from a service connected to the digital and population data services agency.

When necessary, and to adhere to the regulation concerning anti-money laundering and countering the financing of terrorism, we can ask you to provide us with:

- Personal data: occupation, source of funds used in payment transaction, e-mail address and copy of an identification document.

Additionally, we record details of the payment transaction:

- Transaction data: Details of transaction including the name and account number of the payer, the date, time, currency, and amount.
- Device data: Information regarding the device on which you are using the merchant application or website: IP address, MAC address or another identifier.

If you contact our customer support, we record the communication between you and the customer support (emails, chats) with personal data like e-mail address, transmission data and other personal data you have used.

The request for personal data is either legal or contractual requirement. If the use of personal data is mandatory to execute the payment service and fulfilment of Trumo's legal obligations, your payment cannot be made without the personal data.

2. Purposes and legal basis for processing personal data

Trumo collects and processes your personal data for following purposes:

- Providing services: you have initiated payment on merchant's application or website and chosen Trumopay to execute the payment from your bank account. We process personal data to prepare and provide the agreed payment services.

- Compliance: as a payment institution Trumo is obliged to comply with the regulation for payment institutions and monitor the payments on its platform. We process your personal data to comply with the regulation.

- Analytical: to perform statistical and performance analysis to improve the Trumo's business and services. For this no data concerning your personal ID or data required to comply with the anti-money laundering and countering the financing of terrorism is used. The personal data is anonymized or pseudonymized. The legal basis for the data processing is Trumo's legal interest. When preparing analysis, the fundamental rights and freedoms of the persons are protected, and no analysis is performed based on demographical data. The data is protected by security measures.

3. Assigning and transferring the data

We share the necessary data with the merchant, whose goods and services you purchase using Trumopay. The extent of data shared depends on the nature of your purchase. If the services provided by the merchant fall under the obligation to identify the customer, we share your name, date of birth, personal identification number and address. If the merchant's services include payments to you, we also share the bank account number used in your initial payment. In the case of a possible inquiry, we are obligated to share your data with the authorities.

We use data processors for instance maintaining the IT systems. We have data protection agreements (DPA), ensuring the data processing in compliance with the GDPR, in place with the processors.

Our data processors are:

- DoIT Multi-Cloud Sverige International AB
    - data stored in Amazon Web Services (EU/EEA)
- Mongo Atlas
    - data stored in Amazon Web Services (EU/EEA)
- Microsoft
    - data stored in EU/EEA
- IT-support Verano Oy
    - data stored in Microsoft cloud services
- Freshworks customer support communication
    - data stored in Amazon Web Services (U.S./EU/EEA)
- SEON Technologies Kft.
    - data stored in Amazon Web Services (EU/EEA)

Some of the servers of our data processors may be located outside EU/EEA (for instance in the USA). In case personal data is transferred outside EU/EEA, the protection of the data is ensured in compliance with the regulation, for instance by using the Standard Contractual Clauses (SCC), based on EU-US Privacy Framework, or by transferring to the countries with equivalent data protection, as established by the EU.

Microsoft data protection agreement: https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA?lang=12

Amazon data protection agreement: aws-dpa.pdf

Freshworks privacy notice: https://www.freshworks.com/privacy/

4. Storing the data

Trumo will store your personal data for as long as necessary to comply with the purposes stated in this privacy notice and the valid regulation. We store the data collected with the Trumopay payment for five years or longer, if regulation demands: for instance, data needed for accounting must be kept for 6-10 years, depending on the material in question. We store the customer support data and communication for five years. The analytical data is stored for 24 months, whereafter it is either anonymized or deleted. In addition, the persona data is processed as long as needed for settlement of disputes. The information on data subject access requests and implementation of the date protection rights can be stored as long as needed for the implementation and evidence of the data protection rights and measures.

5. Your rights

You have the following rights:

- **Right of access:** You have the right to request information on the data collected on you and for copies of your personal data.
- **Right to rectification:** You have the right to have inaccurate or incomplete personal data corrected.
- **Right to erasure:** You have the right to have your personal data erased, under certain conditions.
- **Right to restrict processing:** You have the right to request Trumo to restrict the processing of your personal data, under certain conditions
- **Right to object:** You the right to object Trumo's processing of your personal data, under certain conditions.
- **Right to withdraw consent:** You have the right to withdraw your consent for processing of your personal information, however, only before the payment is initiated by Trumo. The withdrawal doesn't impact the legality of the processing done before the withdrawal is made.

6. How to exercise your rights

If a you wish to exercise your rights, please contact the Customer support in the first instance via support@trumo.com who will ensure the request is logged and, if necessary, forwarded to the Data Protection Officer. You may also contact the Data Protection Officer (DPO) directly at dpo@trumo.com.

Before we can give out any information from the data register, we have to verify your identity.

7. Automated decision-making Trumo processes your personal data in transaction monitoring, using partly automated decision making, to comply with national and international financial sanctions regulation

8. Complaints

If you believe that Trumo's processing of your personal data violates the regulation, you can make a complaint to the Data Protection Ombudsman, national supervisory authority supervising the compliance with data protection legislation.

Contact information: https://tietosuoja.fi/en/contact-information