

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 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 also at: [dpo\(at\)trumo.com](mailto:dpo(at)trumo.com).

1. Categories of personal data collected

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

- **Personal data:** 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:** Residential address, e-mail address, occupation, source of funds used in payment transaction, and 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 application and/or website, including the device's model, name, or any other identifier and the IP address of the network from which you are using the application and/or the website, including location information.

If you contact our customer support, we record the communication between you and the customer support agent (emails, chats).

2. Purposes and legal basis for processing personal data

Trumo collects and processes your personal data for following purposes:

- **Contractual/consent:** you have initiated payment on merchant's application or website and chosen Trumopay to execute the payment.
- **Compliance:** as a payment institution Trumo is obliged to comply with the regulation and monitor the payments on its platform.
- **Analytical:** to perform statistical and performance analysis to improve the Trumo's service.

3. Sharing and transferring the data

We share some of your data with the merchant who's goods and services you have purchased using Trumopay payment. The extent of data shared depends on the nature of your purchase. We also have a legal obligation to share your data with the authorities in an inquiry.

We don't transfer your data to any country outside the EEA.

4. Safeguarding and storing the data

We are committed to securing your data with technical safeguards and procedural methods. We restrict the access to your data to authorized persons.

We store your data on our servers for five years after your last transaction using Trumopay.

5. Data breach notification

When the personal data breach is likely to result in a high risk to the rights and freedoms of the customer, Trumo Finance shall communicate the personal data breach without undue delay in our website. If we are in the possession of your email address, we shall also inform you via email.

6. Your rights

You have the the following rights:

- **Right of access:** You have the right to request for copies of your personal data. We may charge you for a small fee for this service.
- **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 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.

7. How to exercise your rights

If a you wish to exercise your rights, please contact the Customer support in the first instance via [support\(at\)trumo.com](mailto:support(at)trumo.com) who will ensure the request is logged and, if necessary, dealt with by the Data Protection Officer.

If preferred, you may also contact the Data Protection Officer (DPO) directly at [dpo\(at\)trumo.com](mailto:dpo(at)trumo.com).

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

8. Complaints

If you are unsatisfied with the response of our Customer support or DPO to your reclamation or claim, you can ask for a third party to solve the dispute.

Please contact [Consumer Disputes Board](#) at Hämeentie 3, PL 306, 00531 HELSINKI

Email: [kril\(at\)oikeus.fi](mailto:kril(at)oikeus.fi)

Telephone: +358 29 566 5200 (switchboard)

9. Contact Details for Data Protection Authorities

The [Data Protection Ombudsman](#) is a national supervisory authority which supervises the compliance with data protection legislation.

Street address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PL 800, 00531 Helsinki, Finland

Switchboard: +358 29 566 6700

E-mail (registry): [tietosuoja\(at\)om.fi](mailto:tietosuoja(at)om.fi)