

Privacy Policy

Fina Budget — platform and app · Last updated: June 2026 · Version 1.0

Your finances are personal, and your privacy is central to us. This policy describes what personal data we process, why, how we protect it and what rights you have.

Summary. We process your personal and transaction data to deliver the Service, build your budget and provide coaching. Bank data is retrieved with your consent through a regulated Open Banking provider. We never sell your data, and you can view, change, export or delete it at any time. All the details are below.

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1. Data controller

Fina Budget Nordic AB, company registration number 559576–5891, is the data controller for the processing of your personal data in the Fina Budget service, hereinafter "the Service". You who register an account and use the Service are referred to as "you" or "the User" in this policy. Contact: info@finabudget.se, finabudget.se.

2. Personal data we process

Category	Examples	Source
Identity data	Name, personal identity number (via BankID), email address	You / BankID
Transaction data	Date, amount, transaction text, recipient	File import / Open Banking
Account information	Account name, balance	Open Banking (Roaring / Enable Banking)
Money DNA profile	Answers to questions and a personality result across five dimensions	You
Budget and goal data	Budget targets, savings goals	You / suggestions in the Service
Chat history	Messages to and from the coach	You
Own rules and feedback	Manual category changes and corrections	You
Technical data	IP address, device type, browser, app version	Automatically
Payment data	Subscription status, billing history (not card numbers)	Stripe

We do not process your card details (handled by Stripe), biometric data (handled by BankID and your bank) or health data.

3. Legal basis and purpose

Purpose	Categories	Legal basis (GDPR)
Create and manage your account	Identity data	Contract (Art. 6(1)(b))
Deliver the Service (overview, budget, categorisation)	Transactions, budget and goal data	Contract (Art. 6(1)(b))
Coach, Fina Stories and insights	Aggregated insights, chat history	Contract (Art. 6(1)(b))
Money DNA profile	Money DNA answers	Consent (Art. 6(1)(a))
Bank connection via Open Banking	Account information, transactions	Consent (Art. 6(1)(a))
Improving the quality of categorisation	Anonymised feedback	Legitimate interest (Art. 6(1)(f))
Payment handling	Payment data	Contract (Art. 6(1)(b))
Accounting	Records under the Accounting Act	Legal obligation (Art. 6(1)(c))
Support, security and product analytics	Email, technical data	Legitimate interest (Art. 6(1)(f))

Personal identity number. We process your personal identity number in order to identify you securely via BankID. The processing is clearly justified given the importance of secure identification, in accordance with Chapter 3, Section 10 of the Swedish Data Protection Act.

4. Bank data via Open Banking

If you connect your bank accounts, account information is retrieved through account information services under the payment services directive PSD2. These are provided by **Roaring** via **Enable Banking's** account information services. Enable Banking is subject to supervision by the Swedish Financial Supervisory Authority. We never receive your bank login credentials, and the connection requires your explicit consent and strong customer authentication. Transaction data and account information are retrieved from your bank via this provider. Your consent is valid for 180 days and needs to be renewed every 180 days for the connection to continue, and you can withdraw it and disconnect your accounts at any time.

5. AI and automated processing

We use technology to make the Service more useful. Here we describe how, and which data leaves our systems.

- **Categorisation of transactions.** A proprietary Swedish language model (based on KB-BERT) suggests categories for your transactions. The model runs on our own infrastructure within the EU. Your transaction data is not sent to any external party for this processing.
- **Coach and insights.** The coaching chat uses an external language model accessed via Vercel. Before anything is sent there, our backend compiles your data into aggregated insights. **Raw transactions, bank texts and account numbers are never sent to the model.** Where the model provider processes data outside the EU, the transfer is protected as described in section 7.
- **Automated decisions (Art. 22 GDPR).** All suggestions in the Service are just suggestions, not binding decisions with legal effects. You can always change categories manually, create your own rules, object to the profiling in Money DNA and use the Service without the coach. Contact us if you want to know more about the logic behind a suggestion.

- **Feedback.** When you change a category, the correction may be used to improve categorisation. Before it is used, it is anonymised so that it cannot be linked to you.

Sensitive inferences. Some transactions may indirectly indicate sensitive data, for example health through pharmacy purchases or beliefs through donations. We design the Service to avoid drawing such inferences, and we do not process special categories of personal data for profiling without your explicit consent.

6. Processors and recipients

We never sell your personal data. We only share data with providers necessary to deliver the Service, and with data processing agreements in place.

Provider	Data	Purpose	Location
Vercel	App and system data, aggregated insights	Hosting and access to the language model	EU (model may be accessed in the US)
Railway	Database and backend	Operation and storage	EU
Roaring / Enable Banking	Consent, account information	Open Banking (PSD2)	EU
tic.io	Personal identity number via BankID	Login and authentication	EU/Sweden
Stripe	Payment status (not card numbers)	Subscription and payment	EU/US
PostHog	Technical data, in-app events	Product analytics	EU

In the event of a merger, a sale of the business or a similar corporate event, personal data may be transferred to the new owner. The data must then continue to be processed in accordance with this policy, and we inform you if such a transfer takes place.

7. Transfers outside the EU

We strive to keep data within the EU. When data is processed outside the EU, for example at Stripe or the external language model, the transfer is made primarily to recipients certified under the EU-US Data Privacy Framework, and otherwise with the European Commission's standard contractual clauses and supplementary safeguards in accordance with Chapter V of the GDPR. As described in section 5, raw bank data is never sent to the language model.

8. How long we keep data

Data	Retention period
Account and profile data	As long as you have an active account
Transactions and budget data	During active use; deleted or anonymised when the account is closed
Chat history	During active use; you can delete it
Accounting records	7 years under the Swedish Accounting Act
Technical data and analytics	At most 24 months

9. Cookies and analytics

We use necessary cookies for the Service to function, and product analytics via PostHog to understand and improve how the Service is used. Analytics that are not necessary take place only after your consent, which you can change at any time. We do not use your data for advertising and do not share it with advertising networks.

10. Your rights

Under the GDPR you have the right to request access to, rectification or erasure of your data, to restrict or object to processing, to receive your data in a machine-readable format (data portability) and to withdraw consent. You can export your data and close your account in the Service, and you can contact us to exercise your rights, for example to request erasure. Send your request or complaint to info@finabudget.se, and we normally respond within 30 days.

If you believe that we process your data incorrectly, you can complain to the Swedish Authority for Privacy Protection (IMY), imy.se.

You can unsubscribe from our marketing communications at any time, for example via the unsubscribe link in the messages. To protect your data, we may need to verify your identity before we process a request.

11. Security

We protect your data with technical and organisational measures, including encryption, access control and data minimisation. Login is done with BankID, which means no passwords are stored. Before launch, the security of the Service is reviewed by external IT security expertise, and we carry out a data protection impact assessment (DPIA) for the processing.

12. Changes to this policy

We may update this policy. We inform you of material changes through the Service or by email. The latest version is always available at finabudget.se.

13. Contact

Fina Budget Nordic AB is the data controller. Company registration number: 559576–5891. Email: info@finabudget.se. Website: finabudget.se. The company's registered address is filed with Bolagsverket. Questions, complaints and requests regarding your personal data are handled via info@finabudget.se. Data protection contact: Evelina Hultquist, evelina@finabudget.se.