



Externals Privacy Statement

For Nokia Group



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1 Introduction

Nokia Corporation, including its affiliates (“**Nokia**”), respect the privacy of Externals¹ and have adopted this global Externals Privacy Statement (“**Statement**”) to establish and maintain high standards of data privacy for the personal data of Externals.

This Statement informs you about how Nokia processes your personal data. It sets out what kind of personal data Nokia may process about you, how your personal data are handled and what rights you may have. Nokia may provide you or your Employer² with additional privacy information in Supplements to this Statement or in other notices in connection with particular systems or services. **This Statement does not grant or constitute you any employment-related rights.**

This Statement applies to the collection and automated or otherwise structured (e.g., paper-based filing system) processing of personal data.

The provisions herein are supplemented by applicable mandatory law that prevails to the extent there is a conflict with this Statement. Also, some Nokia entities may have their own local privacy statements. In case of conflict, such local privacy statements prevail over this Statement to the extent the conflict is based on applicable mandatory law.

2 What personal data does Nokia collect?

Nokia collects your personal data directly from you as well as from other sources to the extent permitted by applicable local law. Nokia endeavors only to collect personal data that are necessary for the purpose(s) for which they are collected and to retain such data for no longer than necessary for such purpose(s).

Nokia may need to collect, process and hold various categories of personal data about you in connection with your engagement. Subject to variations due to local mandatory law and practice, the categories of personal data that are typically collected and processed in the engagement context are:

- **Contact details of you and your Employer**, such as your name, address, telephone numbers, email address, date and place of birth, but also information about your Employer, such as the name of the company, place of business, contact details and your (e.g., your managers,

¹ “**External**” means an individual who is not employed by Nokia but who is engaged for Nokia in external resourcing, i.e. subcontracting, service provisioning, external temporary labor and other such activities.

² “**Employer**” means the company that the External is employed by but also any company that Nokia has contacted with regarding external resourcing through which the External is engaged for Nokia.

deputies), and data about others that you provide (e.g., whom to contact in the event of an emergency, and other similar information).

- **Educational and work history information**, such as your CV, previous employments, educational details and qualifications, third party references, background checks and assessments, nationality and/or residence registration information as well as, where permitted by local law, additional information such as credit information or criminal record files.
- **Administration information**, such as your field of operation, former positions as an External, information about job offers by Nokia, photographs, accident reports, performance information, skills and competences records, training records, records of projects you have worked on, time and attendance management records and any grievance records.
- **Information of technical nature**, such as Nokia ID, IDs used for security purposes, user credentials, IDs and passwords, log traffic and location data and other technical information.
- **User generated content**. Some of Nokia's services may allow you to publish (internally or externally as the case may be) information about yourself and others, such as photos, videos, comments to intranet news stories and blog posts.
- **Other information** which you provide in connection with a business purpose of Nokia.

3 What will Nokia do with the personal data?

Nokia will use, store and otherwise process your personal data for the purpose(s) for which they were originally collected as described in this Statement. Subject to statutory record-keeping requirements, Nokia will delete personal data that are no longer needed.

Nokia will process your personal data for the following purposes:

- **Management of contracts**, including activities related to the, management, administration and termination of the contractual relationships and engagements, such as:
 - performance evaluation and training; and
 - handling complaints and grievances.
- **Operations management**, including activities related to managing Nokia's business operations, such as:

- deploying individuals to projects or scheduling work;
 - organizational planning and development;
 - managing company assets; and
 - publishing the names, contact information, photographs and job titles and descriptions of individuals in Nokia's internal directories.
- **IT management**, including activities related to the provision of IT and communication services (e.g., phones, laptops, e-mail, intranet and internet), such as:
 - administration and maintenance;
 - technical trouble-shooting, technical development, statistical analysis; and
 - billing and invoicing.
- **Security management**, including activities related to ensuring the security and safety of Nokia's premises and individuals at Nokia's premises and on business travel, and the security of assets and information (e.g., personal data, trade secrets, intellectual property and confidential information), such as (all subject to applicable local laws):
 - identifying and authenticating individuals;
 - managing access to Nokia's buildings;
 - locating individuals in emergency situations;
 - network or computer monitoring against misuse; and
 - preventing and investigating fraud, industrial espionage and other crime as well as violations of Nokia policies and procedures.
- **Legal and regulatory compliance**, including obtaining and releasing personal data as required by law, judicial organizations or practice in order to comply, such as complying with tax, accounting, securities, health and safety rules and other legal obligations placed on Nokia.
- Any other purposes directly related to the above-mentioned purposes.

Nokia processes your personal data as necessary to perform the contract with your Employer, to exercise its legal rights or perform its legal obligations, and due to the nature of your work. We may also process your data when required by law; for internal administrative purposes of Nokia; and to protect rights and property of Nokia.

4 How is Sensitive Information treated?

Nokia aims to limit the collection of Sensitive Information³ and shall only collect Sensitive Information if there is a legal justification for processing it, or if it is collected and processed with your consent. Nokia recognizes the additional need to protect Sensitive Information. All Sensitive Information is processed in strict compliance with applicable local law and only by a restricted number of individuals who have a clear and justified need to know such information.

Sensitive Information may be processed where necessary to enable Nokia to exercise its legal rights or perform its legal obligations, such as ensuring the health and safety of individuals through the provision of a safe working environment.

5 What steps Nokia take to protect your data?

It is Nokia's responsibility to implement appropriate access control measures to ensure that your personal data is only accessed by persons having a clear need to know such information.

The extent to which your personal data are made accessible will depend upon the nature of the data concerned. Some personal data may be viewed by anyone working at Nokia (e.g., your business contact information in the Intranet). Access to most of your personal data is restricted to certain experts (e.g., Human Resources, Procurement, IT or Legal) to the extent necessary to perform their work tasks.

6 Transfer of your personal data

Nokia will not sell, lease, rent or otherwise disclose your personal data unless otherwise stated herein:

- **Consent:** Nokia may share your personal data if you have given your consent for Nokia to do so.
- **Nokia companies and authorized third parties:** Nokia may share your personal data with other Nokia companies or authorized third parties who process personal data for Nokia for

³ "Sensitive Information" means special categories of personal data as defined under applicable law that may be processed only when there is a legal justification or with the individual's consent. Such special categories include but are not limited to personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or processing of genetic or biometric data for uniquely identifying an individual, or concerns their finances, health, sex life or sexual orientation.

the purposes described in this Statement or otherwise provide personnel related services to Nokia. In such cases Nokia will ensure that there is a genuine need to transfer your personal data.

Authorized third parties include, for example, travel agencies, banks, telecom operators, insurance scheme providers, auditors, professional advisors, external legal counsels, actuaries, trustees, vendors or other third-party suppliers.

Authorized third parties may technically have access to your personal data in the course of providing their services but will be contractually restricted from processing your personal data for other purposes. Nokia also requires them to act consistently with this Statement and to use appropriate security measures to protect your personal data.

- **International transfers of personal data:** Nokia is a global company that has affiliates, business processes, management structures and technical systems that cross national borders. This means that your personal data are transferred to countries other than the one where you are working for Nokia. Such other countries do not always have equivalent laws providing specific protection for or rights in relation to personal data or they have different rules on privacy and data protection. Nokia takes steps to provide adequate protection for your personal data as required by applicable law. Such steps include, for example, the use of standard agreements approved by relevant authorities (e.g., European Commission) and the requirement to use appropriate technical and organizational security measures to protect your personal data.
- **Mandatory disclosures:** Nokia may be required by or under mandatory law to disclose your personal data certain authorities or other third parties, for example, to government agencies responsible for the collection of tax, statistical information or to the police or other law enforcement agencies.
- **Mergers and acquisitions:** Where Nokia takes steps to sell, buy, merge or otherwise reorganize its businesses in certain countries, this may involve disclosing personal data to prospective or actual purchasers and their advisers. In such circumstances, Nokia will take all reasonable steps that such prospective or actual purchasers and their advisers take appropriate measures to protect personal data.
- **Other:** Nokia may disclose your personal data if it is necessary to protect your or another individual's vital interests. Nokia may provide a third party (such as a potential or existing

customer or supplier) with your professional contact details where this is necessary in the course of Nokia's normal business. Nokia may also disclose and otherwise process your personal data in accordance with applicable law to defend Nokia's legitimate interests, for example, in civil or criminal legal proceedings.

7 Your responsibilities

You have a responsibility to comply with applicable laws concerning data protection and privacy as well as relevant Nokia privacy policies, procedures, requirements and guidelines.

During your work, you may have access to, or come into contact with, personal data about others (e.g., Nokia employees or other persons). You must handle and process all such personal data discreetly, confidentially and in accordance with local laws on data protection and privacy as well as Nokia policies, requirements and guidelines. This obligation also applies in your private communication (e.g., not disclosing personal data of others). The obligation to respect data protection and privacy does not cease when your engagement for Nokia ends.

To assist Nokia in maintaining accurate personal data, you need to advise your Employer and Nokia of any changes to your personal data. Failure to comply with your responsibilities as set out in this Statement could have serious consequences for you, your Employer and Nokia. Furthermore, knowingly or recklessly disclosing personal data in breach of Nokia policies, procedures, requirements or guidelines could even make you criminally liable.

8 Your rights

With respect to the processing of your personal data, you will always have the rights as provided in the applicable local law. In addition, this Statement provides you the following rights:

- **Right to access:** You are entitled to be informed of what personal data Nokia holds about you, the purposes for which they are being processed and categories of recipients to whom they are being or may be disclosed. You are also entitled to obtain a copy of your personal data. There may be certain categories of information prescribed by applicable local law that Nokia may lawfully withhold. If Nokia declines to provide access to any of the personal data you request, you will be provided with the reasons for such a decision.

- **Right to request correction and deletion:** Subject to applicable local law, you may be entitled to request Nokia to rectify or delete your personal data that is incorrect, incomplete, unnecessary or outdated.
- **Right to object:** You may object to Nokia's processing of your personal data on compelling, legitimate grounds relating to your circumstances. Despite your objections, Nokia may be required or permitted by law to process your personal data.
- **Right to withdraw consent:** You have the right to withdraw any consent that you furnished for Nokia to process your personal data.
- **Data portability:** When Nokia is processing your data based on your consent or a contract with you, you have a right to request in machine readable format the personal data you have provided to Nokia.
- **Other Rights:** You are entitled to all rights and remedies provided by local applicable law. Generally, you should seek redress in respect of a violation of this Statement from the Nokia company which originally collected the relevant personal data.

If you are not satisfied with what we provide when you exercise your rights, you can let us know by contacting Nokia through provided contacts or channels. If you are still dissatisfied, you also have the right lodge a complaint with a relevant supervisory authority.

9 Whom to contact?

Nokia is not your Employer and does not have sufficient information to answer questions concerning your relationship with your Employer. In such cases, please contact your Employer directly.

If you have any queries you have about your personal data, contact Nokia through provided contacts or channels. Note that you may access and manage much of your personal data online by using the relevant tools.

Nokia may need to identify you and to ask for additional information to be able to fulfill your request. Nokia will fulfill your request within the timeframes required by applicable local law and in absence of law within a reasonable time.



You may also contact Nokia Corporation or our Group Data Protection Officer if you have any queries or concerns about privacy matters in the Nokia Group by writing to the below address or through contact details disclosed in Nokia's privacy intranet.

Nokia Corporation c/o Privacy
P.O Box 226,
FI-00045 NOKIA GROUP,
FINLAND

Some Nokia companies may have their own local Data Protection Officer or similar that you may contact through contact details disclosed in Nokia's Privacy intranet.

10 Controller of your personal data

The controller of your personal data is the Nokia entity with which your Employer has a contractual relationship. That Nokia entity determines alone or occasionally jointly with other Nokia entities the purposes and means of processing your personal data. Nokia Corporation is the controller of your personal data processed in connection with global databases and systems.

11 Changes to this Statement

Nokia will from time to time review and revise its data protection practices including this Statement. If this Statement is changed in a material, adverse way, Nokia will give a prominent notice indicating the existence and nature of the changes on relevant intranet sites or by other more personal means if required by applicable law. We recommend that you re-visit this Statement from time to time to learn of any such changes to this Statement.