



Employment Privacy Statement

For Nokia Group

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1 Introduction

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

This Statement informs you about how Nokia process your personal data in the employment context. 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 with additional privacy information in connection with particular employment-related systems or services.

This Statement applies to the collection and automated or otherwise structured (e.g. paper-based filing system) processing of personal data. This Statement also applies to personal data of any dependants, beneficiaries or third parties that you have provided to Nokia before, during or after your employment at Nokia.

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. Nokia asks for your consent to process your personal data if required by law.

2 Collection of your personal data

Nokia collects your personal data directly from you as well as from other sources to the extent permitted by applicable local law.

Much of the personal data Nokia processes about you will have been collected from you directly during the recruitment process or shortly after you started work. Other personal data about you, such as performance appraisals, skills records and records of projects you have worked on, are generated by you and Nokia management while you are working at Nokia. Nokia may also conduct background checks and assessments if you apply for another position within Nokia or if your position changes materially so that such data collection may be necessary.

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).

3 What personal data does Nokia collect?

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

- **Contact details**, such as your name, home address, telephone numbers, email address, date and place of birth, but also contact details of others that you provide (e.g. whom to contact in the event of an emergency, the details of your dependents and other similar information).
- **Recruitment 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, the results of psychometric tests and criminal record files.
- **Employment administration information**, such as employment and career history, information about job offers of alternative positions or promotions, photographs, termination details, absence records, leave records, accident reports, performance information (including any appraisals or other internal communication regarding performance), skills and competences records, training records, records of projects you have worked on, time and attendance management records and any disciplinary and grievance records.
- **Financial information** relating to your compensation, benefits and pension arrangements, such as details of your salary and any deductions, bank account details, tax codes, governmental national insurance/social security number, travel expenses, company car arrangements, trade union deductions and equity data.
- **Information of technical nature**, such as Nokia ID, IDs used for security purposes, user 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.

4 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. Additionally your personal data may be processed for other purposes you have consented to. Whenever necessary and 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:

- **Personnel management**, including activities related to the recruitment, management, administration and termination of employment relationships, such as:
 - performance evaluation and training;
 - payroll and administration of employment-related equity arrangements and benefits;
 - administration of the Nokia pension and private health insurance schemes;
 - international transfers, succession planning, promotions and other management and development of employees;
 - employment analysis (e.g. comparing the success of various recruitment and employee retention programs); and
 - handling complaints and grievances.

- **Operations management**, including activities related to managing Nokia's business operations, such as:
 - deploying employees on 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 employees in emergency situations;
 - network or computer monitoring against misuse;
 - establishing a network of contacts in case of emergency; 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:
 - participating in or conducting due diligence activities associated with the purchase, sale or re-organization of a Nokia company or business;
 - complying with tax, accounting, securities, employment, health and safety rules and other legal obligations placed on Nokia.
- Any other purposes directly related to the above-mentioned purposes.

5 How is Sensitive Information treated?

Nokia aims to limit the collection of Sensitive Information¹ 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.

¹ "Sensitive Information" means special categories of personal data as defined under applicable law that may be processed only when there is a legal justification (e.g. authorized by law in the field of employment) 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 concerns their finances, health or sex life.

Sensitive Information may be processed where necessary to enable Nokia to exercise its legal rights or perform its legal obligations as an employer. Examples of such obligations include ensuring the health and safety of Nokia's employees through the provision of a safe working environment or where the processing is carried out by a doctor or similar health professional bound by a duty of confidentiality to you, and is necessary for medical purposes, such as under Nokia occupational health schemes.

6 Who has access to 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). Other personal data, such as your performance appraisal, are typically only available to Nokia management responsible for you and appropriate members of the Nokia Human Resources Department. Access to most of your personal data is restricted to certain experts (e.g. Human Resources, IT or Legal) to the extent necessary to perform their work tasks.

7 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 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; benefit, pension or (health) insurance scheme providers, auditors, professional advisors,

external legal counsels, actuaries, medical practitioners, trustees, payroll 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 across international borders to countries other than the one where you are employed by 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 ensure that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law. Such steps include, for example, the use of standard agreements approved by relevant authorities 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 to ensure that appropriate measures to protect personal data are taken by such prospective or actual purchasers and their advisers.
- **Other:** Nokia may disclose your personal data if it is necessary to protect your vital interests. Nokia may provide a third party (such as a potential 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.

8 Your responsibilities

Everyone working at Nokia has a responsibility to ensure that Nokia complies with applicable laws concerning data protection and privacy as well as and the 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). Depending on your role within Nokia such personal data may range from individuals' names to Sensitive Information about their health. 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 employment with Nokia ends.

To assist Nokia in maintaining accurate personal data, you need to advise Human Resources of any changes to your personal data. If you provide personal data about members of your family, dependants, beneficiaries or other third parties (e.g. for emergency contact or benefits administration purposes), it is your responsibility to inform them of the processing of such data and their rights thereto as described in this Statement.

Failure to comply with your responsibilities as set out in this Statement could have serious consequences for you and for Nokia. You may be subject to disciplinary action, up to and including termination of employment. Furthermore, knowingly or recklessly disclosing personal data in breach of Nokia policies, procedures, requirements or guidelines could even make you criminally liable.

9 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. 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, delete or block (as appropriate) your personal data that is incorrect, incomplete or unnecessary.
- **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.
- **Remedies in case of a violation:** 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.

10 Whom to contact?

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

If you want to exercise your rights as described in Section 9 of this Statement you may make a request personally or send a signed request in writing to Human Resources through provided contacts or channels.

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 if you have any queries or suggestions concerning Privacy matters in the Nokia Group or if you believe that a Nokia company or business is not complying with this Statement. Such queries, suggestions and concerns may be made or reported in 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

Nokia shall investigate non-compliance and take action it considers appropriate.

11 Cooperation with data protection authorities

Subject to applicable law, Nokia will respond to all requests for information and cooperate with any investigations by competent national data protection authorities. Nokia will also, consistent with the applicable law and in consideration of all relevant stakeholder interests, implement recommendations from national data protection authorities.

12 Assessment and audit

Nokia will ensure that procedures established to implement this Statement are subject to internal assessment or audit, or to assessment or audit by independent third parties.

13 Controller of your personal data

The controller of your personal data is the Nokia entity with which you have an employment relationship which 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.

14 Changes to this Statement

Nokia will from time to time review and revise its data protection practices including this Statement. If any amendments are made, 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 local law.