



# Privacy at Nokia

Key Concepts and Principles

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## 1 Introduction

Nokia creates technology that helps the world act together. We are a business to business (B2B) technology innovation leader helping to accelerate and transform businesses, while leveraging the exponential potential of networks to drive impact at scale.

While delivering mobile, core and fixed network infrastructure with software, services, and advanced technologies to customers around the world, on a daily basis, data of billions of subscribers are processed in networks containing Nokia's products and services.

Privacy and the protection of personal data becomes even more important in increasingly connected societies, and it is a vital aspect in the networks, products, solutions and services that we deliver to our customers. Getting privacy right is fundamental in ensuring trust in our technology, our business, and our operations.

We understand that being the partner of choice for organizations comes with responsibility. That's why our commitment to privacy is embedded in every facet of our decision making and product design processes.

Embedding strong governance practices builds trust with all our stakeholders.

In the context of a rapidly evolving regulatory landscape, our global privacy program is a comprehensive, cross functional, company-wide privacy framework to ensure accountability for privacy in all levels across Nokia. It is crucial for Nokia to hold itself to the highest standards when it comes to protecting privacy and personal data. For us, respecting privacy is not only about being compliant with laws; it is a fundamental value of a trustworthy and ethical company. Privacy is a key element and metric in Nokia's Environmental, Social and Governance (ESG) strategy. Nokia pursues continuous improvement of privacy and personal data protection both in our practices and processes as well as our products and services.

Nokia drives the latest developments in technology and privacy, and proactively participates in the discussions with industry groups, governments, legislators, and regulators. Nokia is a trusted partner with a privacy compliance framework and program that delivers a competitive edge to its customers.

This white paper explains how we operate and manage privacy in our products and services in order to meet our customers' expectations, ensuring compliance to legal requirements and support with day-to-day privacy issues.

**At Nokia, we believe that privacy is everyone's business.**

Everyone at Nokia, at every level, isn't just informed about privacy, they are encouraged to actively seek out ways to deliver on our promises, and improve on our high standards.

Together with our partners and suppliers we deliver products and services that don't consider privacy just a checkmark. We seek to embed it in everything we do.

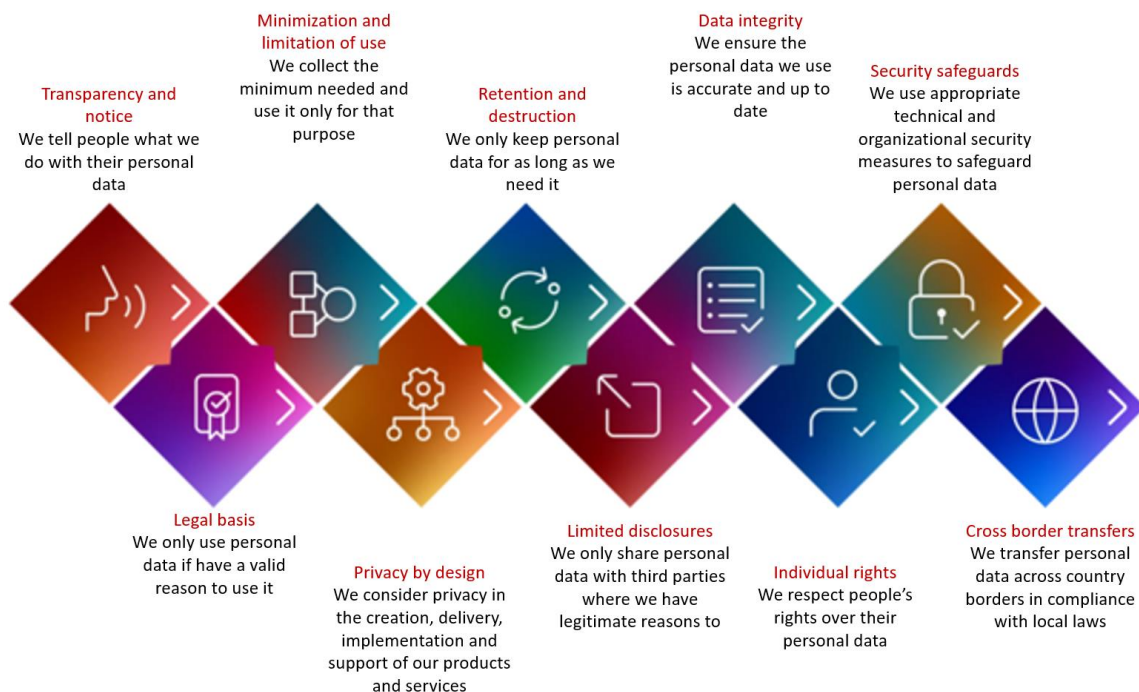
## 2 Nokia privacy principles

Nokia's [Code of Conduct](#) includes Privacy as a specific policy detailing Nokia and its employees commitments to privacy.

With the overriding objectives of ensuring trust, security and reliability, leveraging transparency and respect for privacy, Nokia has defined key privacy principles that are based on internationally recognized privacy standards, best practices and regulation.

Each privacy principle translates into concrete privacy requirements with implementation guidelines. Nokia's privacy principles are the subject of mandatory privacy trainings that our employees must complete at regular intervals.

Our [privacy principles](#) also enable us to support our customers to comply with data protection laws that apply to them.



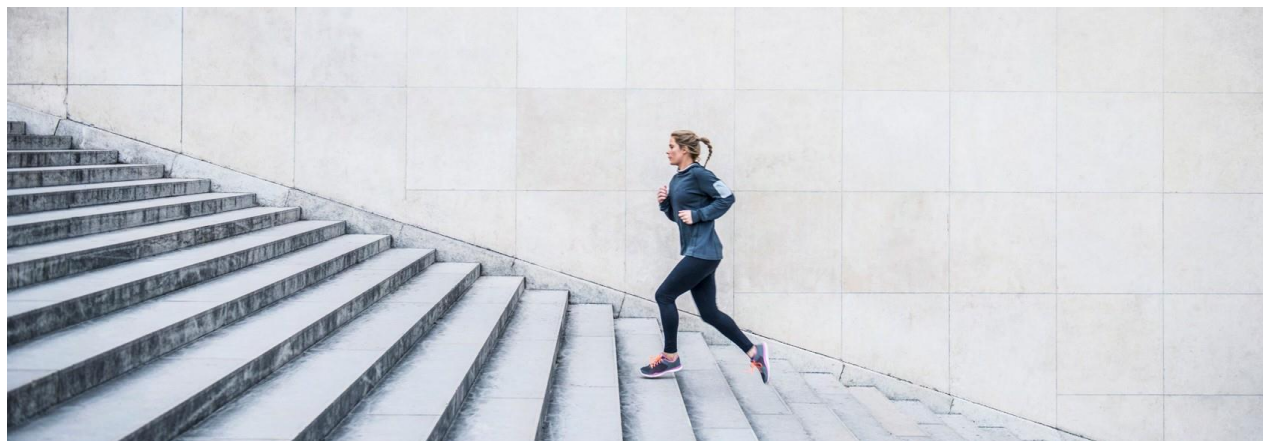
## 3 Nokia's privacy organization

To effectively manage privacy in a company with employees located across the globe, providing solutions and services over 100 countries, requires ongoing diligence, commitment and agility. Starting at the top with Nokia leadership, and supported by a dedicated team of privacy professionals, our governance ensures that responsibility for protecting personal data cascades into every level of our corporate structure.

Nokia's Chief Privacy Officer leads the Global Privacy Office ("GPO"), and with a network of Privacy Leads, Privacy Champions and Privacy Legal Partners embedded in our business groups and central functions, drives Nokia's Privacy Program across our global operations.

Nokia's Group Data Protection Officer ("Group DPO") is a part of the GPO. The Group DPO performs his/her statutory duties under applicable data protection law, is Nokia's primary contact for data protection authorities and works with the Chief Privacy Officer and Privacy Leads, to advise and assist with ensuring privacy compliance. Where required by local law, country level Data Protection Officers are appointed following alignment with country senior executives.

Nokia's GPO is accountable for planning and overseeing Nokia's strategic Privacy Program, designing and developing related policies, procedures and standards, delivering related training, governing privacy practices, establishing privacy strategy across Nokia, ensuring regulatory compliance and providing legal guidance.



## 4 Privacy risk management

At Nokia, we see privacy as enabling trust in technology, business, and operations. Accordingly, we have developed privacy risk assessment frameworks to ensure compliance with regulatory and customer requirements.

### 4.1 Privacy Risk Assessments

For Nokia, privacy risks are the risks to an individual's rights and freedoms as well as risks of regulatory non-compliance for Nokia as a company. We have implemented processes aimed at proactively identifying privacy threats and risks throughout the lifecycle of each processing activity - from the planning of a processing activity, during the actual processing of personal data, all the way to the end of the process lifecycle. The deployment of Nokia's Privacy Program across all business groups, central functions and countries, requires privacy assessments of all personal data processing activities, including related IT assets and suppliers who process on Nokia's behalf. These assessments ensure creation of required inventories and records of processing activities, identify risks, guide on remediation, and assign actions to relevant stakeholders, with defined timelines to complete required actions.

The volume, sensitivity, use of personal data, and type of individuals are some factors considered to determine the complexity of the assessment required. Where the risk level of the activity necessitates a deeper review, a Data Protection Impact Assessment (DPIA) is initiated. Nokia's Group DPO is responsible for reviewing all high-risk activities that require a DPIA and defining any required remediation actions.

Risk remediation is tracked and subject to internal audit. Nokia's Group DPO has broad overall oversight for auditing and monitoring all DPIAs.



## 5 Respecting individuals' rights

### 5.1 Requests from individuals

While being a B2B company, Nokia's procedures ensure that individuals are able to effectively exercise their rights with respect to their personal data.

Nokia respects data processing related individual rights in jurisdictions across the globe, consistent with requirements of applicable laws.

Nokia uses tooling and automation to fulfil individual requests in an effective and timely manner.



## 6 Government Authority Requests

Nokia has a procedure to review governmental authority requests for personal data as well as privacy related requests from supervisory authorities.

Nokia does not disclose personal data to law enforcement or other governmental agencies unless required to do so by law.



## 7 Personal data breaches

All alleged and reported privacy incidents are treated with the appropriate importance in accordance with Nokia's incident response procedures. Our incident response procedures enable us to manage privacy incidents and requests in a timely and effective manner, collaborating with relevant privacy and security stakeholders internally at Nokia and with our customers when required.

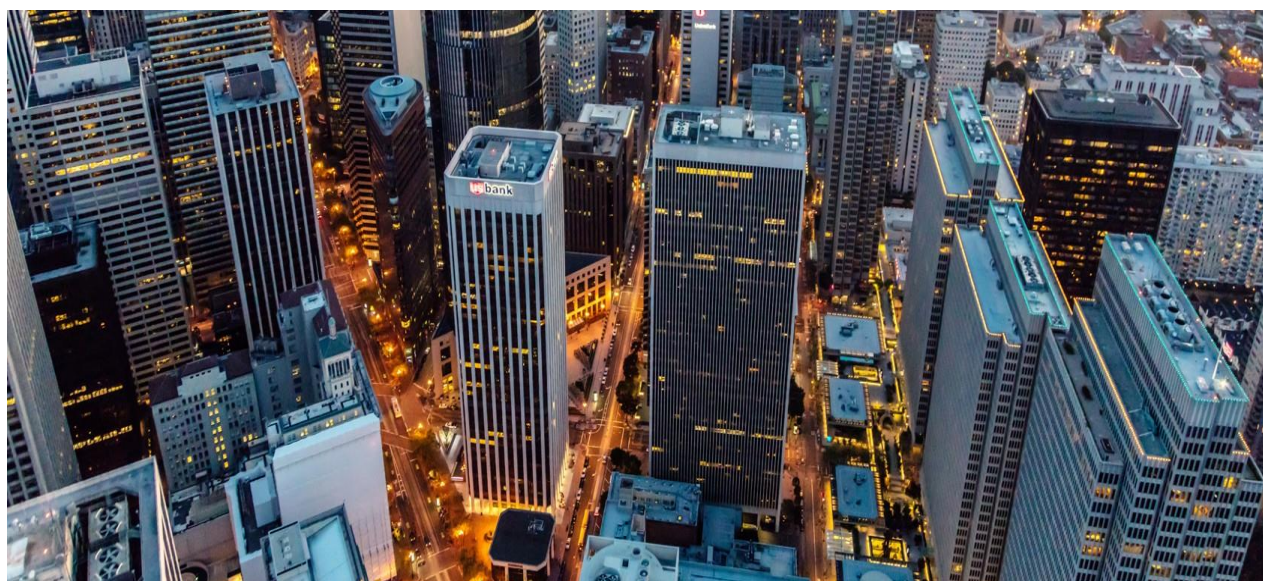


## 8 Privacy in engineering and design

Privacy is an inseparable part of Nokia’s product and service development. Nokia has privacy engineering processes in place for implementing privacy requirements into the product’s lifecycle. By privacy engineering, we mean the use of engineering activities for designing security and privacy controls, and risk mitigations. Privacy considerations and controls are implemented in the product design lifecycle at early stages in product design and development.

Privacy is also considered an integral part of our security processes. The Nokia Design for Security (“DfSEC”) process includes security requirements and security architecture that are, in tandem with privacy requirements, applied to every product from an early stage of its lifecycle. Security processes, tools and technologies are constantly updated to meet changing customer needs and market conditions. At Nokia, Security and Privacy work collaboratively, hand in hand, to ensure protocols and measures are in place.

Further information about how we deal with security in our products is outlined in our White Paper on Security. Please see further information on Security and Privacy at Nokia: [Security and privacy | Nokia](#)



## 9 Privacy in supply chain management

Security and privacy are essential elements of Nokia's procurement and supply chain process. Every supplier we use for our products and services is systematically assessed and qualified. Our supply chain process contains several mandatory privacy and security controls that are applied to suppliers based on privacy risks identified.

Nokia's supplier privacy requirements are detailed in our supplier contracts, and suppliers are required to commit to these as part of their contractual obligations. In addition to contractual measures, privacy and security controls include privacy and security assessments, supplier trainings, and monitoring activities. We require our suppliers who process personal data on our behalf to treat personal data with the same high standard of care that we do.



## 10 Customer privacy support and international transfers

Nokia has developed several privacy-enhancing tools that help our customers to process personal data safely and in compliance with applicable data protection laws.

In order to ensure legally compliant movement of our and our customers' personal data around the world, we conclude Data Processing Agreements ("DPAs") with our suppliers and our customers. Our DPAs include data protection provisions that are required by applicable data protection laws to protect personal data enabling our and our customer's compliance with applicable data protection laws. If a particular jurisdiction restricts transfers of personal data, our DPAs implement appropriate transfer mechanisms to enable compliant transfers of personal data.



# 11 Nokia's Global Privacy Policy Content Page

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- 2 Nokia privacy principles
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  - 2.2 Legal basis
  - 2.3 Minimization and Limitation on Use
  - 2.4 Privacy by Design
  - 2.5 Retention and Destruction
  - 2.6 Limited Disclosures
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- 4 Contact



At Nokia, we create technology that helps the world act together.

As a B2B technology innovation leader, we are pioneering networks that sense, think and act by leveraging our work across mobile, fixed and cloud networks. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs.

Service providers, enterprises and partners worldwide trust Nokia to deliver secure, reliable and sustainable networks today – and work with us to create the digital services and applications of the future.

For our latest updates, please visit us online [www.nokia.com](http://www.nokia.com) and follow us on Twitter @nokia.

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