



Supplemental Privacy Notice – Network as Code

Last Updated: 10 January 2024

Introduction

Nokia Solutions and Networks Oy and its [Affiliates | Nokia](#) (collectively, “*Nokia*,” “*we*,” or “*us*”) *want you* to be familiar with how we collect, use and disclose personal data.

This Privacy Notice describes how we process personal data in connection with Nokia’s Network-as-Code (“NaC”) Platform and Services.

“**personal data**” is information that identifies you as an individual or relates to an identifiable individual.

You are not required to provide personal data to Nokia. If you choose not to provide your personal data to Nokia, we may not be able to provide you with either our products or services or all of their functionalities or to respond to queries you may have.

For more information regarding personal data we collect in our Business Relations generally and in our recruitment activities, please see our notices on our privacy hub [We care about your privacy | Nokia](#).

What Personal data do we collect

We collect the following categories of personal data:

Category	Elements
Identity Data	Including first name, last name.
Contact Data	Including billing address, email address, and phone number
Access Data	Such as Nokia ID, IDs used for security purposes, user credentials for access to online services and platforms, IDs and passwords, log traffic and location data, and other technical information.
Financial Data	Such as any bank account and payment card details you provide to us in connection with your purchase of NaC Services.
Location Data	Such as third party GeoIP location data, combined with your IP address, GPS data, or other data that reveals your location
Device Data	Such as information about your devices and your use of our services through your use of our website or from other sources. These records typically include IP-address, access times, the sites linked from, pages visited, the links and features used, the content viewed or requested, browser or application type, language, and other such

	information. When you use our services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to Nokia by the telecommunications operator as a standard part of that communication This includes data obtained through cookies and similar technologies as described here .
--	--

Sensitive personal data

Unless we request it, we ask that you do not send, and you do not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) to us.

How do we use personal data

We use your personal data for legitimate business purposes as described in the overview below.

Purpose	Examples of Processing Activities	Personal Data Categories	Legal Basis	Third-party Sources
Briefly explain the business purpose you are trying to achieve	How you use data to achieve the purpose you've identified in the first column	Which categories of personal data from the list you identified above are you using.	What legal basis are you relying on. NB refer to the privacy assessment for this	Where personal data comes from a third party rather than directly from the individual themselves, identify that third party.
To create an account for You on the NaC Portal	Adding your name and information our database and processing payments	Identity Data, Contact Data, Financial Data	Relying on our legitimate interests in ensuring the functionality of our products	n/a
Providing the functionality of the NaC Portal and Services and fulfilling your requests as well as securing, enhancing, repairing, and maintaining our NaC Portal and Services	To identify you in order to provide access to the NaC Portal and deliver Services and investigate misuse	Identity Data, Access Data, Location Data	Relying on our legitimate interests in ensuring the functionality of our products	n/a
Communicating with you	Sending you emails or other notifications regarding your Account for the NaC Services	Identity Data, Access Data	Relying on our legitimate interests in ensuring the functionality of our products	n/a

*where we rely on legal obligations please see the 'Other disclosures'

Disclosure of personal data

We also disclose your personal data as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so, as set out in further detail below.

Disclosures

Recipients	Purpose
Cloud Service Providers (Amazon Web Services, Inc., and R Software, Inc.)	- To make the NaC Portal, APIs, and Services available to you
Our affiliates	- All purposes described in this Privacy Notice.

Other Disclosures

Purpose	Further Detail
To comply with applicable law and regulations	This may include laws outside your country of residence, which could give rise to a legal obligation requiring us to process your personal data, including: Civil and commercial matters: for example, where we are in receipt of a court order to disclose information for the purposes of court proceedings, such as under Regulation (EU) No 1215/2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters. Criminal matters: for example, to comply with requests and orders from EU and EU Member State law enforcement to provide information in relation to a criminal investigation in compliance with applicable local laws, or to take steps to report information we believe is important to law enforcement where so required or advisable under applicable local laws. Consumer matters: for example, to comply with requests from competent authorities under EU or EU Member State consumer protection law, such as under Directive (EU) 2019/2161 and its implementing laws in EU Member States. Corporate and taxation matters: for example, to comply with our obligations under applicable EU Member State corporate and tax legislation, such as where a national tax law of an EU Member State requires collection of specific transactional personal data for tax purposes. Regulatory matters: for example, to respond to a request or to provide information we believe is necessary or appropriate to comply with our obligations to engage with regulators, such as when relevant EU Member State data protection supervisory authorities initiate investigation under the General Data Protection Regulation into our company. These can include authorities outside of your country of residence. Compliance and internal investigations: for example, to comply with whistleblowing requirements under Directive (EU) 2019/1937 and its implementing laws in EU Member States.

Purpose	Further Detail
	Health and safety regulations: for example, to comply with health and safety reporting obligations in accordance with applicable local laws, such as in relation to accidents involving members of the public on our premises.
For other legal reasons	For dispute resolution purposes; To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
In connection with a sale or business transaction	We have a legitimate interest in disclosing or transferring your personal data to a third-party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). You will be notified of any such business transaction and of possible changes to the processing of your personal data in accordance with applicable law and the ' <i>Updates To This Privacy Notice</i> ' section.

Cookies and similar technologies

We may collect personal data through the use of cookies and similar technologies. Please see our [Cookies and Similar Technologies Policy](#) for more information.

How we keep data secure

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "*Contacting Us*" section below.

Your choices and rights over your data

Your choices regarding our use and disclosure of your personal data for direct marketing purposes

We give you choices regarding our use and disclosure of your personal data for marketing purposes. You may opt out from:

- (1) **Receiving marketing-related emails, mobile messages or direct message via social media from us.** If you no longer want to receive marketing related messages from us on a going-forward basis, you may opt out by using the links provided to you in the relevant direct marketing messages you have received by emailing privacy@nokia.com/ via our



[privacy request form](#). Please note that important administrative messages may still be sent to you even if you opt-out from marketing and other communications from Nokia

(2) **Our sharing of your personal data with affiliates for their direct marketing purposes.**

If you would prefer that we discontinue sharing your personal data on a going-forward basis with our affiliates for their direct marketing purposes, you may opt out of this sharing by emailing privacy@nokia.com/ via our [privacy request form](#).

(3) **Our sharing of your personal data with unaffiliated third parties for their direct marketing purposes.**

We obtain your prior consent to sharing your personal data in this way. If you would prefer that we discontinue sharing your personal data on a going-forward basis with unaffiliated third parties for their direct marketing purposes, you may opt out of this sharing by emailing privacy@nokia.com/ via our [privacy request form](#). You should contact the relevant third party directly to exercise your rights to opt out from their marketing messages.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing from us, we may still send you important administrative messages, from which you cannot opt out.

How you can exercise your rights

If you would like to request to access, correct, update, suppress, restrict, or delete personal data, object to or opt out of the processing of personal data, withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal), or if you would like to request to receive a copy of your personal data for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us in accordance with the “*Contacting Us*” section below. We will respond to your request consistent with applicable law.

In your request, please make clear what personal data you would like to have changed or whether you would like to have your personal data suppressed from our database. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

There may also be residual information that will remain within our databases and other records, which will not be capable of removal.

You may lodge a complaint with an EU/EEA data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available at <https://ec.europa.eu/newsroom/article29/items/612080>.

Data Quality and Retention

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law, for example, for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

The criteria used to determine our retention periods include (i) the length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us); (ii) whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of transactions for a certain period of time before we can delete them); or (iii) whether retention is advisable in light of our legal position (such as in regard to enforcement of our contractual terms, applicable statutes of limitations, litigation or regulatory investigations).

Where a legal obligation arises or retention is advisable in light of our legal position, in some circumstances, we will retain certain personal data, even after your account has been deleted and/or we no longer provide services to you.

- **To cooperate with law enforcement or public, regulatory and government authorities:** If we receive a preservation order or search warrant, related to your account, we will preserve personal data subject to such order or warrant after you delete your account.
- **To comply with legal provisions on tax and accounting:** We may retain your personal data, such as Financial Data and Relationship History after you delete your account, for the amount of time appropriate to local limitation periods, as required by tax law and to comply with bookkeeping requirements.
- **To pursue or defend a legal action:** We may retain relevant personal data in the event of a legal claim or complaint, including regulatory investigations or legal proceedings



about a claim related to your personal data, or if we reasonably believe there is a prospect of litigation (whether in respect of our relationship with you or otherwise) for the amount of time appropriate to local limitation periods, after the dispute has been settled or decided by a court or tribunal from which there is no further right of appeal.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Third Party Services

This Privacy Notice does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third-party operating any website or service to which our products or services link. The inclusion of a link via any of our services does not imply endorsement of the linked site or service by us or by our affiliates.

Children

We do not knowingly collect personal data from individuals under 16 for the purposes outlined in this Privacy Notice.

International Data Transfers

Your personal data may be stored and processed in countries where we have facilities, [Affiliates | Nokia](#), where we engage service providers and other authorized parties, and by engaging with us you understand that your personal data will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

Where this will involve transferring your personal data outside the UK and/or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

Adequacy Decisions: Some non-EEA countries are recognized under the UK GDPR and/or by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here [JUSTICE](#)



[AND CONSUMERS ARTICLE 29 - National Data Protection Authorities \(europa.eu\)](#) and here [UK ICO List Adequacy List of Countries](#)

Standard Contractual Clauses and Binding Corporate Rules: For transfers of personal data from the UK and/or EEA to countries outside the UK/and or EEA which are not considered adequate under the UK GDPR and/or by the European Commission, we have put in place appropriate measures to protect your personal data. For example, we use standard contractual clauses adopted under the UK GDPR and/or by the European Commission or binding corporate rules. You may obtain a copy of these measures by contacting us in accordance with the “Contacting Us” section below. “UK GDPR” has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018.

Updates to this Notice

The “*LAST UPDATED*” legend at the top of this Privacy Notice indicates when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice.

Contact Us

The Nokia entity identified above 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 our global databases and systems.

If you have any questions about this Privacy Notice, please contact us by emailing privacy@nokia.com/ via our [privacy request form](#).

Because email communications are not always secure, please do not include sensitive information in your emails to us.

You may also contact our Group Data Protection Officer at:

Nokia Corporation c/o Privacy
Karakaari 7
P.O. Box 226
FI-00045 Nokia Group
Finland

