

# PRIVACY NOTICE

## Issued by Dalriada Trustees Limited in its capacity as Trustee of the Nokia Retirement Plan for Former NSN and ALU Employees (the "Scheme")

Date: May 2024

### Introduction

1. The Trustee is the data controller in respect of the personal information that we hold in relation to the Scheme. Because we use your personal information, we have to provide you with certain information in order to comply with Data Protection Legislation.
2. This notice should help you understand more about how the Trustee (and anyone acting on its behalf) processes your personal data and the arrangements which are in place to protect your personal data. This notice is being provided for your information – you do not need to take any action in response to it.

### Collection of personal data

3. As a member of the Scheme, the Trustee will hold certain personal data relating to you. This may include, for example:
  - name, gender, address, date of birth, telephone number and email address;
  - National Insurance number, and tax status;
  - service history, including details of salary and other benefits, details of salary sacrifice arrangements and details of any period of absence and working hours;
  - marital status and details of any dependants/relatives;
  - bank details (typically this information is only held where your benefits under the Scheme are in payment or due to come into payment shortly);
  - in certain cases, information relating to your health (considered special category data previously known as sensitive personal data);
  - we may ask you to provide other special category data (e.g. information about your personal relationships) if it is relevant to help us decide on an internal dispute resolution procedure;
  - certain categories of special category data (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme; and
  - any other personal data which may be required to calculate the benefits provided in respect of you from the Scheme or as necessary for the proper running and administration of the Scheme.
4. Some of this data is collected directly from you (for example, by you filling in forms in relation to your membership of the Scheme, or corresponding with the Trustee or a representative of the Trustee by telephone, post, email or otherwise). If you visit Nokia websites, they may automatically collect some data about you and your visit, including the Internet protocol address used to connect your device to the Internet

and some other data such as your browser type and version and the pages on the site that you visit. We may also collect some data from other sources. For example:

- Some data is collected from your employer and/or your former employer and other companies in the Nokia Group.
- We may also occasionally obtain data about you from other third party sources (for example, the Scheme administrators, the company's payroll provider, HM Revenue and Customs).

5. Except in those cases where it is indicated that the provision of data is purely voluntary, you are required to provide the personal data requested of you so that the Trustee can use it for the purposes set out below, including the performance of its duty to operate the Scheme efficiently and in order to comply with its legal obligations.
6. Failure to provide requested personal data could lead to the Trustee being unable to process the benefits provided in respect of you from the Scheme. If you have any questions about the Trustee's need for your information, please raise your questions with the person making the request or the Data Compliance Lead (the Trustee) who may be contacted at [NokiaRP@dalriadatrustees.co.uk](mailto:NokiaRP@dalriadatrustees.co.uk).

## Use of personal data

7. The Trustee may use your personal data for the following purposes:
  - to run and administer the Scheme properly and efficiently;
  - to administer the benefits provided in respect of you from the Scheme;
  - help manage risks and liabilities in the Scheme in order to seek to be able to pay full benefits as far as possible;
  - help the Scheme's sponsoring employer's comply with its their legal and regulatory duties;
  - to comply with the Trustee's regulatory and legal obligations in its capacity as Trustee of the Scheme;
  - improve our information and knowledge of pension schemes generally; and
  - otherwise in connection with your membership of the Scheme, or as required by law.

## What are our legal grounds for processing your personal information?

### In order to comply with our legal obligations

8. As the Trustee of the Scheme, we are under legal obligations to process your personal information in order to comply with pensions and other relevant legislation, the Scheme's rules, court rulings and Pensions Ombudsman decisions. For example:
  - legislation sets out certain things trustees must do (e.g. sending certain information to the Scheme's members); and
  - the Trustee is subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation.
9. It is necessary for us to process your personal information in order to comply with these legal obligations.

### In order to fulfil our legitimate interests

10. Processing your personal information is also lawful if it is based on our 'legitimate interests'. The Trustee has a legitimate interest in running and managing the Scheme and managing the Scheme's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal

information by the Trustee (e.g. your employer may need information in order to comply with regulatory requirements).

11. In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

## What are our legal grounds for processing your sensitive personal information?

12. There are three legal grounds that allow us to process your special category data (sometimes referred to as sensitive personal data):

- when we obtain **explicit consent** from you (e.g. when you sign one of the Scheme's forms which contains the appropriate consent wording);
- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under pensions law; and
- when processing is **necessary** for reasons of substantial public interest (which, under the Data Protection Act 2018, applies to certain processing by trustees of occupational pension schemes when making decisions about benefits).

13. The Trustee is legally entitled to process your personal data as described in this notice because it needs to do so in order to pursue the purposes described above in the operation of the Scheme. The Trustee does not generally rely on your consent to justify its processing of your data. If the Trustee does need your consent in any particular case it will ask you for it separately – you are not obliged to consent and if you do consent, you can withdraw it at any time where the Trustee is relying on your consent to justify its processing. (Although not providing or withdrawing consent could mean the Trustee has insufficient evidence to assess your eligibility or continued eligibility for benefits under the Scheme).

## International Transfers of Data

14. These disclosures may involve transferring your personal data overseas. You should be aware that this may include transfers to countries outside the UK, which do not have similarly strict data privacy laws. In those cases, where personal data is transferred to your employer's Group or the Trustee's service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your personal data is protected, on terms approved for this purpose by the European Commission or any other body as approved in the United Kingdom. As of the date on which this notice is issued, there are no such agreements in place (because the Trustee has not to date transferred any personal data overseas).

## Retention

15. Your personal data will be retained for such period as is reasonably necessary for the proper running and administration of the Scheme and the performance of the Trustee's legal obligations and the pursuit of its legitimate interest. Because trustees of pension schemes can commonly face complaints or questions from members, former members, other individuals or regulatory authorities many years after a member / beneficiary has ceased to be entitled or prospectively entitled to benefits, some personal data may need to be kept indefinitely. However, the Trustee will not retain personal data for longer than is necessary having regard to the purpose for which it is held. In cases concerning special category of data (e.g. medical information), where you have provided consent to the initial processing of such data, it may also be necessary to retain some or all of the information provided (including in cases where consent is withdrawn) as necessary for the defence of legal claims. The Trustee will keep this data retention policy subject to review and may update it from time to time to ensure it remains appropriate.

16. As a result, the Trustee will generally keep your personal information for the lifetime of the Scheme plus 15 years (which is the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods.

## How do we keep your personal information secure?

17. We use a range of measures to safeguard your personal information, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

## What do we do with any personal information that is provided by third parties?

18. We receive personal information from sources other than directly from you. This includes information shared by your Scheme employer, the Scheme's administrator, its professional advisers, service providers and other relevant third parties.
19. When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the Scheme and the Scheme more generally.

## Who do we share your personal information with?

20. For the purposes of administering and managing the Scheme, managing its risks and liabilities, and paying benefits under it, the Trustee may need to share your personal information with third parties. This will include your employer (e.g. the payroll, finance, compliance, audit and HR teams) or another company in the Nokia Group. It will also include third parties who provide advice or services to the Trustee. These third parties may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, medical advisers, and any other such third parties as may be necessary for the operation of the Scheme and to enable the Trustee to carry out its duties e.g. independent financial advice providers in connection with member option exercises.
21. We've set out a list of the third parties with whom we share your personal information where possible, links to their data protection and privacy information.
22. Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've included links to their online privacy information if you want to find out more about how they process your personal information.
23. In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to The Pensions Regulator or HM Revenue and Customs.
24. We may also share your personal data with the Scheme's employers to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).
25. Sometimes, in order to improve our knowledge and information of pension schemes generally (so that we may improve our ability to run the Scheme appropriately), we pool the personal data we hold with that of other pension schemes through third parties (for example, to obtain up to date and more accurate longevity data

## Your rights

### What rights do you have in respect of your personal information?

- 26.** In certain circumstances, you have the following rights in respect of your personal information:
- the right to object to us processing your personal information;
  - the right to request access to personal information relating to you;
  - the right to request that we correct any mistakes in your personal information;
  - rights in relation to automated decision taking;
  - the right to request to restrict or prevent processing of your personal information;
  - the right to request to have your personal information transferred to another data controller (e.g. if you decide to transfer your pension benefits to another pension scheme); and
  - the right to request to have your personal information deleted.

### How will we respond to your request?

- 27.** We will usually respond to any request that you make in relation to your rights within a month of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the UK's data protection laws at [www.ico.org.uk](http://www.ico.org.uk).
- 28.** Under the UK's data protection legislation, there are exemptions which mean that, in certain circumstances, we may continue to store, process or transfer your personal information (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so) even if you ask us not to.

## Changes to personal details

- 29.** In order to enable the Trustee to meet its legal obligations you should notify the Pensions Team of any changes to your personal details (e.g. address or other contact details) as soon as possible.

## Miscellaneous

- 30.** The Data Compliance Lead can be contacted at the following email address [NokiaRP@dalriadatrustees.co.uk](mailto:NokiaRP@dalriadatrustees.co.uk) in relation to any questions about this notice.
- 31.** The Trustee would encourage you to use its own internal procedures and informal discussions with the Data Compliance Lead to resolve any concerns you may have about data privacy in the first instance. However, you do have the right to lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)) or by calling their helpline on 0303 123 1113.

## Changes to this policy

- 32.** Any changes we make to this notice in the future will be available on request from the Data Compliance Lead (changes will also be published and/ or communicated directly if it is deemed appropriate to do so by the Trustee). Please check for any changes if you are using a printed copy of this notice.

## More about how and why we process your personal information

PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Address	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use it to send you information that we think will be relevant to you as a member of the Scheme.	We have a legal obligation to send certain information to members of the Scheme. In addition, we may send additional information to fulfil our legitimate interest of running the Scheme.	This information is initially provided by you or your employer when you joined the Scheme. Your employer may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Scheme's administrator.
Telephone number			
Email address			
Name and title	We use this information to identify you and to create and update your membership record in the Scheme.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.	If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third party tracing agent to obtain up to date contact information.
Date of birth and your Scheme retirement date			
Gender			
Marital status	We use this information to help us decide who should receive what benefits from the Scheme.	We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.	
Dependents			
Next of kin			
National Insurance number	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	The Trustee is also required to comply with tax legislation and deduct the correct level of tax from benefits.	The Scheme's administrators may create a unique reference number so that your records can be easily identified.
Employment start and, if applicable, end dates			
Payroll number			
Bank account details	We use this information in order to pay your benefits under the Scheme directly to you.	Processing this information also fulfils the Trustee's legitimate interests in running and managing the Scheme.	Your bank details provided by you when you fill in your membership form and when you update your details.
Tax status			
Salary details			
Scheme reference number			

Details about your entitlement to pension benefits under the Scheme	We use this information to calculate the correct level of your benefits under the Scheme.	See the section above on the previous page.	Details about your entitlement to benefits under the Scheme may be provided by your employer or be determined by reference to the Scheme's governing documentation. The Scheme's actuary and administrators will carry out calculations, the results of which will be added to your record.
Investment choices	We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment funds.	We have a legal obligation to ensure that the Scheme is run properly and in line with its governing documents. There is also specific legislation that governs payment of contributions into money purchase investment funds.	We (or our third party providers) give you information about the investment options that are available to you. You then provide us with your choices and any changes to your investment choices.
Death benefit nomination forms	We use this information as part of our decision making process when deciding who will receive death benefits.	As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes	You provide us with the information contained on our death benefit nomination forms.
Medical information (including medical records and doctors' opinions)	We use this information as part of our decision making process when deciding ill health benefits under the Scheme.	an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We	Medical information relating to you may be provided directly by you, by the Scheme employer, your doctor or by a third party providing health assessments / reports.
Information about your personal relationships	This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.	also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.	This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.

<p>Certified copies of official documents, including:</p> <ul style="list-style-type: none"> <li>• passport;</li> <li>• driving licence;</li> <li>• birth certificate;</li> <li>• marriage certificate</li> <li>• death certificate; and</li> <li>• decrees nisi / absolute.</li> </ul>	<p>This information is used to:</p> <ul style="list-style-type: none"> <li>• identify you;</li> <li>• determine the status of your relationship;</li> <li>• determine who may be entitled to benefits under the Scheme; and</li> <li>• trigger certain processes in respect of your benefits under the Scheme (e.g. payment of death benefits or splitting of benefits in cases of divorce).</li> </ul>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustee to make legally valid decisions.</p>	<p>This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g. when we are having difficulty locating a member or identifying their next of kin) publically available official documentation may be obtained by a third party tracing agent.</p>
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## Third parties

For the purposes of administering the Scheme and paying benefits under it, the Trustees may need to share your personal information with certain third parties. This section lists the key third party service providers with whom we share your personal information

THIRD PARTY	ROLE	USE OF PERSONAL DATA	OTHER INFORMATION (IF APPLICABLE)
Aon Solutions UK Limited	Actuary	Aon are the Scheme's named actuary for statutory purposes use personal data in order to perform actuarial calculations, or as requested by the Trustee to provide advice in respect of the Scheme.  The Scheme's actuary has to use personal data in order to fulfil certain statutory or regulatory duties, for example, relating to the formal scheme valuations.	<a href="#">Click here for Aon's privacy notice</a>
Gowling WLG	Lawyers	The Scheme's lawyer uses personal data in order to provide legal advice to the Trustee.	<a href="#">Click here for Gowling's privacy notice</a>
Aptia	Administrator	The Scheme's administrator uses personal data in order to run the Scheme and pay benefits to members and other beneficiaries.	<a href="#">Click here for Aptia's privacy notice</a>
Crowe UK LLP	Auditor	The Scheme's auditor uses personal data as part of its work auditing the Scheme's financial records and accounts.	<a href="#">Click here for Crowe UK's privacy notice</a>
Nokia UK Limited	Principal Employer	The Scheme's employer uses personal data in order to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).	<a href="#">Click here for Nokia's privacy notice</a>
Aptia	Payroll	Provides payroll services to the Scheme	<a href="#">Click here for Aptia's privacy notice</a>
Clerical Medical Limited	AVC providers	Provides administration services in relation to AVCs.	<a href="#">Click here for Clerical Medical's privacy notice</a>

Aegon (Formerly Blackrock)			<a href="#">Click here for Aegon's privacy notice</a>
Utmost Life			<a href="#">Click here for Utmost's privacy notice</a>
Aviva Investors			<a href="#">Click here for Aviva's privacy notice</a>
Prudential Corporate Pensions			<a href="#">Click here for Prudential's privacy notice</a>
Phoenix Life and Pensions			<a href="#">Click here for Phoenix Life's privacy notice</a>
Insurance Pension Corporation	Insurer buy-in		<a href="#">Retirement Privacy Policy - Aviva</a>
Aviva			<a href="#">Retirement Privacy Policy - Aviva</a>

## Key terms and phrases

<b>Data controller</b>	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity.
<b>Data Protection Legislation</b>	means the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 and the General Data Protection Regulation as adopted in the UK, together with regulatory guidance and codes of practice issued by the Information Commissioner's Office.
<b>Data protection principles</b>	<p>means the principles that are set out in the Data Protection Legislation relating to the processing of personal data. In the General Data Protection Regulation, there are six principles:</p> <ul style="list-style-type: none"><li>• lawfulness, fairness and transparency;</li><li>• purpose limitation;</li><li>• data minimisation;</li><li>• accuracy;</li><li>• storage limitation; and</li><li>• integrity and confidentiality.</li></ul> <p>In addition, there is an overarching principle of accountability.</p>
<b>Data processor</b>	means a natural or legal person or other body who processes personal data on behalf of the data controller.
<b>Data subject</b>	means the identified or identifiable living individual to whom personal data relates.
<b>General Data Protection Regulation (UK GDPR)</b>	is the primary EU legislation that, on and from 25 May 2018, applies to the processing of personal data in all member states of the EU. The UK GDPR is retained in UK law by virtue of section 3 of the European Union (Withdrawal) Act 2018.
<b>Group</b>	The "Group" means your employer and its associated companies; further details of which can be obtained from the Data Compliance Lead.
<b>Information Commissioner's Office (ICO)</b>	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
<b>Personal data or Personal information</b>	means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
<b>Privacy notice</b>	means the information that is provided to inform individuals about what you do with personal data. Under the Data Protection Legislation, data controllers must provide accessible information to individuals about the use of their personal data.

**Processing**

means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Special categories of personal data**

(also referred to as sensitive personal data)

means:

- personal data that is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation.

**"relating to you" or "about you"**

The references in this notice to data "relating to you" or "about you" include references to data about third parties such as your spouse, civil partner, co-habitee and/or children (if any) which you provide to the Trustee on their behalf. Where you provide such data (for example, when completing or updating an expression of wish form / death benefit nomination form), you should inform the third party that you are providing such data and share a copy of this notice with them so they also understand how this data is processed.