

RECRUITMENT PRIVACY NOTICE FOR VIACOM ENTITIES IN SINGAPORE

A. SCOPE OF PRIVACY NOTICE

1. Like most businesses, we hold and process a wide range of information, some of which relates to individuals who are applying to work for us. We at Viacom take our responsibilities under the Singapore Personal Data Protection Act 2012 (“**PDPA**”) seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data. This Privacy Notice explains the type of information we process, as well as why and how we collect, use, disclose and/or process the personal data you provide to us.

This Privacy Notice focuses on individuals who are applying to work for us and the data we process as part of that process. We have a separate Workplace Privacy Notice that applies to our current and former employees. For the avoidance of doubt however, nothing in this notice is intended to create an employment relationship between Viacom and any non-employee.

For the avoidance of doubt, in the event that Singapore personal data protection laws permit an organisation such as Viacom to collect, use, and/or disclose the Applicant’s personal data (as defined below) without the Applicant’s consent, such permission granted by the law shall continue to apply.

B. WHAT DO WE MEAN BY “PERSONAL DATA”?

2. “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Examples of personal data that we may collect from you include your name, identification number, date of birth, contact information, financial records, and/or health records.

C. WHY WE COLLECT, USE, DISCLOSE AND PROCESS PERSONAL DATA

3. To administer and/or manage all job applications for employment with Viacom, we will necessarily need to collect, use, disclose and/or process certain personal data about the applicant who has expressed an interest in being employed by Viacom (the “**Applicant**”).
4. Such personal data will be collected, used, disclosed and/or processed by us for the purposes of:
 - (a) processing, administering, managing and/or assessing the Applicant’s suitability for any position for which the Applicant may apply at any Viacom entity including for recruitment, payroll administration, financial planning and budgeting
 - (b) entering into a contract with the Applicant (if the Applicant is made an offer by us)
 - (c) facilitating communication with the Applicant and/or his/her nominated contacts in an emergency;
 - (d) managing and administering the security control and access rights by the Applicant to Viacom’s premises including without limitation processing, facilitating and making arrangements for the Applicant’s travel;
 - (e) managing, facilitating and administering activities and/or transactions that are conducted or offered by Viacom and/or external entities which may include the disclosure of the Applicant’s information to other external entities;

- (f) monitoring of diversity and equal opportunities during recruitment;
- (g) complying with legal or regulatory obligations or Viacom's internal policies and procedures (including regulatory reporting in accordance with statutory obligations that may be required by law); and
- (h) responding to legal process, pursuing legal rights and remedies, defending litigation and managing complaints or claims.

(collectively, the "**Purposes**")

Please note that if you accept an offer from us, Viacom may/will process further information as part of the employment relationship. We will provide you with our full Workplace Privacy Notice as part of the on-boarding process.

D. WHERE THE PERSONAL DATA COMES FROM

- 5. You also acknowledge that Viacom may/will also be collecting from sources (such as third party recruiters, agents and similar organisations) other than from you, your personal data, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes.

E. WHO GETS TO SEE YOUR PERSONAL DATA

- 6. **Internal Use.** Where necessary and in accordance with this Privacy Notice, your personal data will be disclosed to relevant managers, HR and administrators for the Purposes. We will also disclose this to other members of our Viacom group where necessary for decision making regarding your application – this will depend on the type of role you are applying for.
- 7. **External Use.** Your personal data will/may also be disclosed by us to third party services providers or agents (whether in Singapore or elsewhere in the world where such service providers are sited) for one or more of the above Purposes, as such third party service providers or agents, if engaged by Viacom, would be processing your personal data for Viacom, for one or more of the above Purposes.
- 8. **Specific issues for the disclosure of personal data to third parties.** We respect the confidentiality of the personal data you have provided to us. In this regard, apart from the Purposes set out above, we will not disclose any of your personal data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:
 - (a) cases in which the disclosure is required based on the applicable laws and/or regulations;
 - (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
 - (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - (d) cases in which there are reasonable grounds to that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
 - (e) cases in which the disclosure is necessary for any investigation or proceedings;

- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer; and
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

The instances listed above at section 3.1 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to review the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://sso.agc.gov.sg>.

In all other instances of disclosure of personal data to third parties with your express consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

F. TRANSFER OF PERSONAL DATA

- 9. Where personal data is transferred by us to any third parties outside of Singapore, we will ensure that such transfers are compliant with the requirements under the PDPA. In this regard, we will take necessary measures to ensure that such overseas recipients are bound by legally enforceable obligations to ensure that these overseas recipients provide a standard of protection to the personal data so transferred that is comparable to the protection under the PDPA.

G. REQUEST TO WITHDRAW CONSENT

- 10. You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request to the contact details listed below.
- 11. We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

H. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 12. We will take appropriate measures to keep your personal data accurate, complete and updated.
- 13. We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 14. We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

I. COMPLAINTS

15. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
16. Please contact us through one of the following methods with your complaint or grievance:
 - (a) Telephone number : +65 6420-7220 or 6420-7286
 - (b) Email address : EmployeePrivacyRights@viacom.com
(Attention it to the '**Data Protection Officer**')
 - (c) Office address : 151 Lorong Chuan, #03-08 New Tech Park
Singapore 556741
(Attention: the Data Protection Officer)
17. Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in Viacom to handle. For example, you could title the subject header as "**PDPA Complaint**".
18. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

J. STATUS OF THIS NOTICE

19. As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
20. We reserve the right to amend the terms of this Privacy Notice at our absolute discretion. Any amended Privacy Notice will be posted online and can be viewed at <https://www.viacom.com/recruitment-privacy-notice-apac/>.
21. This Privacy Notice does not form part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this Privacy Notice is intended to create an employment relationship between Viacom and any non-employee.