

VIACOMCBS PRIVACY NOTICE FOR ENTITIES IN THE EEA AND SWITZERLAND

UPDATED: January 20, 2021

This notice describes the personal data that ViacomCBS Inc. (“ViacomCBS”, “we”, “us” or “our”) and its entities in the UK, European Union and Switzerland may collect about individuals, specifically with respect to the re-opening of our offices, productions and other sites (collectively, the “Sites”) as staff begin to return to our Sites following the outbreak of the novel coronavirus 2019 n-CoV (“COVID-19”).

Please note that this notice applies to our employees and also to other individuals who carry out work for us such as freelancers, consultants or talent that we engage. In this notice, we refer to this broader group of persons as ‘Employees’ for ease. Section I, II, IV, V and VII of this notice may also apply to employees, contractors and agents of our third-party productions, so far as they access our Sites.

In particular, this notice explains:

- what personal data we collect;
- why we process your personal data;
- the legal grounds which allow us to process your personal data; and
- who gets to see your personal data.

I. PERSONAL DATA – WHAT WE COLLECT AND WHY WE PROCESS IT

COVID-19 is the infectious disease caused by the most recently discovered coronavirus. COVID-19 is highly contagious and spreads easily from persons who have the virus to other persons. In order to reduce the risk of spreading the illness among our Employees, as well as outside of our Employee population, ViacomCBS may collect and process certain personal data relating to your health and circumstances.

As you know, in early 2020, in response to the outbreak and spread of COVID-19, ViacomCBS closed its Sites worldwide to non-essential employees. As we begin to gradually reopen our Sites we may process your personal data in accordance with our health and safety protocols and applicable law in order to minimize the risk of Employees contracting COVID-19 in our workplace.

Specifically, where permitted by applicable law, we may request, and in certain cases, require, that you participate in one or more daily health screenings prior to entering any of our Sites. Please refer to the appendix specific to your Site for further information on the testing that we may implement. To date, such health screenings may include:

- (1) a health questionnaire (the “Health Check”); and
- (2) an on-site or at-home temperature check (“Temperature Check”); and
- (3) diagnostic testing for COVID-19 (“Diagnostic Tests”).

Health Check Data

We may process the following personal data about you by virtue of the Health Checks: your name, department, business email address, the date(s) you will be on Site, and whether you have answered affirmatively to any questions about whether you or anyone in your household has or has been exposed to COVID-19, has certain COVID-19 related symptoms, has travelled internationally, works in the healthcare industry or otherwise was exposed to positive COVID-19 patients.

We may also ask (be it as part of any Health Check or separately) whether you or a member of your family are particularly vulnerable to the virus, for example due to having certain health conditions.

Please note that we will not process your personal data unless necessary for our purposes. Normally, the only information that we will record will be whether you have answered *affirmatively* to any of the Health Check questions. However, in some cases (such as where you have identified yourself as being particularly vulnerable) we may need to seek further details from you.

Temperature Check Data

We may process the following personal data about you during the Temperature Check: your name, department, business email address, the date of the check, and whether your body temperature is at or greater than 38°C (100.4°F) (together with data described in “Health Check Data” and “Diagnostic Test Data”, referred to as the “Health Data”). We will normally only process data where your temperature meets or exceeds the relevant threshold.

Diagnostic Test Data

In connection with our productions, we (or the production companies with which we partner in the respective territories) may ask you to participate in diagnostic testing (namely, Covid-19 PCR Rapid Molecular Testing or any analogous medical tests) before entering into specific production Sites. We may also offer diagnostic testing, on a voluntary basis, to non-production Employees who need to enter our Sites.

Any such testing will be facilitated by an external health service provider and carried out by qualified doctors, nurses or other trained medical personnel engaged on our behalf (“Health Providers”) or on behalf of our local production partners. These Health Providers will only process limited data about you in a confidential and secure manner and, in some instances and subject to the applicable local laws, will notify us of any positive results and/or whether you are not approved to enter the Site. When relevant, limited ViacomCBS staff may be able to access positive testing results in order to ensure health and safety in the production Sites and take any necessary steps, including by sharing test results with public health authorities to the extent required by local laws.

II. WHAT WE WILL DO WITH THE DATA

The data collected will be used to ensure that we keep our Sites as safe as possible.

In the event that:

- you inform us, or a Diagnostic Test indicates, that you have (or someone in your household has) been positively diagnosed with COVID-19 and you have entered the Site and/or been in contact with other Employees;
- you inform us, or a Diagnostic Test indicates, that you have (or someone in your household has) been positively diagnosed with COVID-19 but have not entered the site, or have had contact with other employees;
- you inform us that you have (or someone in your household has) symptoms of COVID-19;
- you inform us that you are (or someone in your household is) particularly vulnerable to the virus; or
- we record a body temperature above 38°C (100.4°F).

we may take **one or more** of the following actions, **as relevant**:

- notify the other Employees or individuals who might have been exposed to you and/or update our intranet with a list of the building and floor on which the office of a positively-diagnosed Employee is located.

This is especially important information for our staff who may be particularly vulnerable to the virus, or who have vulnerable family members who they may then need to isolate from. Please note that when notifying other individuals of potential exposure, **we do not** share your name or any identifiable personal data unless required by the local health authority or if you give us express permission; we only inform them that we understand that they have come into contact with someone with a positive diagnosis. As such, if we tell you we believe you have been in contact with someone with the virus, please understand that we cannot confirm or deny the specific person;

- reach out to discuss next steps, including self-isolation measures;
- seek more information from you in order to discuss with you options to mitigate the risks the virus poses to you and/or someone in your household;
- request that you carry out your duties off-site (to the extent this is possible); and
- record any action taken as above.

III. WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR HEALTH DATA?

A summary of the grounds for processing personal data under applicable data protection law is available in the legacy Viacom Workplace Privacy Notice (the “WPN”), which is available [here](#), or in the applicable legacy CBS Workplace Privacy Notice (the “CBS WPN”), which you can request from your local Human Resources representative. In addition, you may refer to our COVID-19 Privacy Notice dated March 27, 2020, available [here](#).

In this case we process your data in order to comply with our legal obligation to safeguard our Employees. Additionally, as your Health Data is special data, before processing it, we ensure that the processing is necessary for the purposes of carrying out our obligations and exercising our rights in the field of employment, social security or social protection law. In this case we have an obligation to ensure a safe place of work and a general duty of care to all our staff. We also believe that such processing is necessary for reason of substantial public interest.

In certain jurisdictions, we may also process your data on the basis of the Employee’s consent and to comply with any relevant sanitary protocols provided by the local authorities/administrations/federations.

IV. WHO SEES YOUR HEALTH DATA?

Your Health Data will be processed by and/or shared with a limited group of critical ViacomCBS personnel, all of whom are members of ViacomCBS’ COVID-19 response team and some of whom are located in the United States. For further information about how and why we transfer your personal data outside of the UK or EEA generally, please refer to the WPN or CBS WPN, as applicable.

Your Health Data may also be shared with your supervisor(s), and with public health authorities to the extent required by local laws.

Otherwise, as mentioned above, in the event of a positive diagnosis, we may inform work-related individuals who you may have come into contact with **on an anonymous basis**, and, if relevant, critical personnel of ViacomCBS productions and its production partners, and union or guild representatives, **on a confidential and need-to-know basis**.

V. HOW LONG DO WE RETAIN YOUR PERSONAL DATA

As a general principle we will only keep your personal data for as long as it is necessary for the purposes set out above – i.e. to protect Employees and visitors and to keep our sites safe. This may depend on how long the COVID-19 pandemic lasts, relevant government guidance, and scientific developments. For example, as information on immunity develops we may keep data on who has had the virus (and so is likely to be immune) to allow us to better manage risk.

In some circumstances, your data may be kept where necessary for legal purposes or for the for the establishment, exercise or defence of legal claims.

VI. OTHER INFORMATION

The Health Data will be kept securely and – save as above - will not be used for purposes outside of dealing with the COVID-19 crisis.

For further information on how we process your personal data, including your data rights under applicable data protection law, and how to contact us, please refer to the WPN or CBS WPN, as applicable.

VII. STATUS OF THIS NOTICE

For the avoidance of doubt, this 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 notice is intended to create an employment relationship between ViacomCBS and any non-employee.

Please click on the link for your office:

Czech Republic

Denmark

Finland

France

Germany

Hungary

Italy

Netherlands

Poland

Portugal

Spain

Sweden

Switzerland

United Kingdom

Czech Republic

If you are employed, engaged or otherwise in the Czech Republic for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
MTV Networks S.R.O.	Perlová 371/5, 110 00, Praha 1, Czech Republic

We may implement the following type of screening(s):

- Health questionnaires
- Temperature check

Denmark

If you are employed, engaged or otherwise in Denmark for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Nordic, filial af VIMN Nordic AB, Sverige	Flæsketorvet 26-28, 1711 København

We may implement the following type of screening(s):

- Health questionnaires
- Temperature check

Finland

If you are employed, engaged or otherwise in Finland for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Nordic AB filial i Finland	Kaisaniemenkatu 3B 4th floor Apartment 21. 00100 Helsinki

In accordance with local data privacy legislation, we have no plans to implement employee health screenings at this time.

France

If you are employed, engaged or otherwise in France for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
MTV Networks SARL 3454	22 rue Jacques Dulud, 92521 Neuilly Sur Seine, Paris
Game One SAS 3459	22 rue Jacques Dulud, 92521 Neuilly Sur Seine, Paris
Paramount Pictures France SARL	20-24, rue Jacques Ibert 92300 Levallois-Perret
Paramount Home Entertainment (France) S.A.S.	20-24, rue Jacques Ibert 92300 Levallois-Perret
Worldwide Enterprises (France) SARL	Rue de 4 Septembre, 75002 Paris, France

In accordance with local data privacy legislation, employee health screenings would not be implemented at this time. However, in certain exceptional and specific circumstances, we may implement employee health screenings subject to having obtained the express consent of the person concerned and to comply with any relevant sanitary protocols provided by the local authorities/administrations/federations.

Additionally, local guidance requires employees to inform us in the event of suspected or actual infection – it is important that you do this in order to protect other employees. You should also monitor your temperature each day and if it is above 38 degrees Celsius/100.4 degrees, do not come into work. We will provide further information as to what you should be looking for and who you should contact.

For individuals who will take a diagnostic test, please complete and return the consent form on the next page.

INFORMED CONSENT FOR COVID-19 DIAGNOSTIC TESTING - FRANCE

In connection with and during the production of _____¹, I voluntarily consent and authorize a physician, healthcare provider, hospital or other healthcare facility or other trained medical personnel engaged on behalf of ViacomCBS Inc. or one of its subsidiaries to conduct collection, testing, and analysis for the purposes of a COVID-19 diagnostic. I acknowledge and understand that my COVID-19 diagnostic test will require the collection of an appropriate sample by a healthcare provider through a nasopharyngeal swab, oral swab, or other recommended collection procedures. I understand that this COVID-19 test is being administered for the purposes of a safe return to work and for no other purpose. I understand that this testing does not constitute medical treatment of any kind and if I test positive for COVID-19 I am solely responsible for obtaining medical care. In the event of a positive diagnosis, I understand that my result may be confidentially shared in accordance with the VIACOMCBS PRIVACY NOTICE FOR ENTITIES IN THE EEA AND SWITZERLAND.

Name:

Signature:

Date:

¹ Insert name of production for which you are scheduled to provide services and appear on Site.

Germany

If you are employed, engaged or otherwise in Germany for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Germany GmbH	Boxhagener Strasse 80, 10245, Berlin
Paramount Home Entertainment (Germany) GmbH	Betastr. 10 C, Unterfoehring
Paramount Pictures Germany GmbH	Betastr. 10 C, Unterfoehring
CBS International GmbH	Munchen Geschäftsanschrift, Prinzregentenstrabe 72, 81675 Munich
Pluto TV Europe GmbH	Boxhagener Strasse 80, 10245, Berlin

In accordance with local data privacy legislation, we have no plans to implement employee health screenings at this time.

Local guidance requires employees to inform us of any suspicion of infection - it is important that you do this in order to protect other employees.

Hungary

If you are employed, engaged or otherwise in Hungary for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
Viacom International Hungary Korlátolt Felelősségű Társaság	Bocskai út 134-146, Budapest, 1113
Viacom Intl Hungary Kft.	Bocskai road 134-146, Dorottya udvar 1113 Budapest

We may implement the following type of screening(s):

- Health questionnaires

Italy

If you are employed, engaged or otherwise in Italy for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
Viacom International Media Networks Italia SRL	Corso Europa, 5 - 20122 Milan
VIMN Advertising and Brand Solutions SRL	Corso Europa, 5 - 20122 Milan
Paramount Home Entertainment (Italy) SRL	8 Via Virgilio, Rome
CBS International Television Italia SRL	Palazzo Valadier, Piazza del Popolo 18 – 00187 Rome

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

Additionally:

- Local guidance requires employees to inform us of any suspicion of infection - and it is important that you do this in order to protect other employees
- Temperature checks are mandatory – we are required to carry these out

Netherlands

If you are employed, engaged or otherwise in the Netherlands for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Netherlands B.V.	NDSM-plein 6, 1033 WB, Amsterdam
Paramount Pictures International Ltd (Amsterdam Ofc)	Atlas Arena, Asia Building, 2nd Floor, Hoogoorddreef 5 1101 BA
CBS International (Netherlands) B.V.	Gerrit van der Veenstraat 11, 1077 DM, Amsterdam

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

Poland

If you are employed, engaged or otherwise in Poland for one of the following companies, the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Poland Sp. z o.o.	ul. Mokotowska 19, 00-560 Warszaw
Paramount Poland sp. z.o.o.	ul. Mokotowska 19, 00-560 Warszaw

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

Portugal

If you are employed, engaged or otherwise in Portugal the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
MTV Networks Unipessoal Lda	Torre Ocidente, Rua Galileu Galilei, 2 – 4ºA 1500-392 Lisbon
MTV Ownership (Portugal), Lda	Torre Ocidente, Rua Galileu Galilei, 2 – 4ºA 1500-392 Lisbon

In accordance with local data privacy legislation, we have no plans to implement employee health screenings at this time.

However, local guidance requires employees to inform the National Health Authority in the event of suspected or actual infection. If you have or suspect you have the virus please tell us too so we can protect other employees. You should also monitor your temperature each day and if it is above 38 degrees Celsius/100.4 degrees, do not come into work. We will provide further information as to what you should be looking for and who you should contact.

Spain

If you are employed, engaged or otherwise in Spain the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
Viacom International Media Networks España, S.L.U.	Paseo de Recoletos 33, 28004 Madrid
Paramount Spain S.L.U.	3 Calle de Albacete, Madrid

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

Additionally:

- Local guidance requires employees to inform us of suspected contact with the virus - and it is important that you do this in order to protect other employees

Sweden

If you are employed, engaged or otherwise in Sweden the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Nordic AB	Kungsbro Strand 31, 112 26 Stockholm
Paramount Sweden AB	Kungsbrostrand 31, 112 26 Stockholm

We may implement the following type of screening(s):

- Health questionnaires

Switzerland

If you are employed, engaged or otherwise in Switzerland the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
CBS Interactive GmbH	Bruder-Klausen-Weg 3, 6072 Sachseln,

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

United Kingdom

If you are employed, engaged or otherwise in United Kingdom the following additional information applies.

The Data Controller is the entity listed below and its affiliates:	Address:
Channel 5 Broadcasting Limited	17-29 Hawley Crescent London NW1 8TT
The Paramount UK Partner	17-29 Hawley Crescent London NW1 8TT
Viacom International Media Networks U.K. Limited	17-29 Hawley Crescent London NW1 8TT
Nickelodeon - UK (JV)	17-29 Hawley Crescent London NW1 8TT
VIMN CP Services (UK) Limited	17-29 Hawley Crescent London NW1 8TT
Viacom Camden Lock Limited	17-29 Hawley Crescent London NW1 8TT
Viacom Global Limited	17-29 Hawley Crescent London NW1 8TT
Paramount Pictures International Limited	Building 5 566 Chiswick High Road, W4 5YF
Paramount Pictures UK	Building 5 566 Chiswick High Road, W4 5YF

CBS Interactive Limited	The Warehouse, The Bower 207-211 Old Street London EC1V 9NR
Simon & Schuster (UK) Limited	Cannon Place, 78 Cannon Street, London EC4N 6AF
CBS Broadcast Services Limited	
Last FM Limited	

We may implement the following type of screening(s):

- Health questionnaires
- Temperature checks

Testing for Production Sites

In addition to the above, in certain **Production Sites**, specific circumstances and in certain cases, we may require that you participate in testing (namely, Covid-19 PCR Rapid Molecular Testing or any analogous medical tests, "Covid-19 Testing") before entering into the specific Production Sites. We may also offer voluntary testing to non-production Employees who are required to enter our Sites. Testing will be facilitated by our External Health Service providers (Fleet Street Clinic and World Extreme Medicine and any other ones that we may contract in the future with the appropriate safeguards in place) and carried out by qualified doctors and nurses.

Our External Health Service providers will only process limited data about you in a confidential and secure manner and will notify us of the results. Pursuant to applicable law, such data may include name, sex, date of birth, NHS number, ethnicity, address, telephone number, and email address, in addition to the Health Data. Limited ViacomCBS staff will be able to access testing results in order to ensure health and safety in the Sites and take any necessary steps as explained above. including sharing results with public health authorities to the extent required by local laws.