

# WORKPLACE PRIVACY NOTICE FOR VIACOM ENTITIES IN THE EEA, UK AND SWITZERLAND

## SCOPE OF PRIVACY NOTICE

1. Like most businesses, we hold and process a wide range of information, some of which relates to individuals who work for us. This privacy notice explains the type of information we process, why we are processing it and how that processing may affect you.

The notice focuses on individuals who work for us, whether employed by us or not. It also focuses on individuals who we contract to work on our or third parties' productions. This includes those in production roles, such as designers, production assistants, camera crew etc. and also those working on-screen, be it as extras or featured performers, as well as our voiceover artists. In addition, it also covers information on former employees/workers and those who we have previously contracted to work on our or third parties' productions. For the avoidance of doubt however, nothing in this notice is intended to create an employment relationship between Viacom and any non-employee.

This privacy notice is set out in this document (the Core Notice) and Annex 1- Supplementary Information. We have also provided the local information, which makes clear any material differences in your particular jurisdiction. This can be found in Annex 2. Please note also that Viacom will also comply with all applicable local laws (including but not limited to any GDPR implementing legislation which has yet to be created) in relation to processing your personal data and if anything in this privacy notice conflicts with such local laws, those local laws will take precedence.

In the Supplementary Information, we explain what we mean by "personal data", "processing", "sensitive personal data" and other terms used in the notice.

2. In brief, this notice explains:
  - what personal data we hold and why we process it;
  - the legal grounds which allow us to process your personal data;
  - where the data comes from, who gets to see it and how long we keep it;
  - how to access your personal data and other rights;
  - how to contact us.

## PERSONAL DATA – WHAT WE HOLD AND WHY WE PROCESS IT

3. We process data for the purposes of our business including management, administrative, employment and legal purposes. We also process data for the purposes of our business including for our or third parties' production, broadcasting, distribution, marketing, management, administrative, employment and legal purposes. The Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data. See *Legal grounds for processing personal data* and *Further information on the data we process and our purposes*.

## **WHERE THE DATA COMES FROM AND WHO GETS TO SEE IT**

4. Some of the personal data that we process about you comes from you. For example, you tell us your contact and banking details.

Other personal data about you is generated in the course of your work, for example, from your managers, colleagues and customers or others outside our organisation with whom you deal.

Your personal data will be seen internally by managers, HR and, in some circumstances, colleagues. We will, where necessary and as set out in this privacy notice, also pass your data outside the organisation. For example, we may pass your data to people you are dealing with and payroll agencies.

Further information on this is provided in the Supplementary Information. See *Where the data comes from* and *Who gets to see your data?*

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

5. We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for the duration of your employment and for a period afterwards.

See *Retaining your personal data – more information* in the Supplementary Information.

## **TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA**

6. Due to the international nature of Viacom's business, we will where necessary and as set out in this privacy notice transfer your personal data outside the EEA to our group companies and processors in the US or, on rarer occasions, other jurisdictions in which we are established. If you featured in a production, the data constituting your performance may be transferred out of the EEA for distribution and marketing purposes.

Further information on these transfers and the measures taken to safeguard your data are set out in the Supplementary Information under *Transfers of personal data outside the EEA – more information*.

## **YOUR DATA RIGHTS**

7. You have a right to make a subject access request to receive information about the data that we process about you. As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted and to be given the data in machine readable format for transmitting to another data controller. Further information on this and on other rights is in the Supplementary Information under *Access to your personal data and other rights*. We also explain how to make a complaint about our processing of your data.

## **CONTACT DETAILS**

8. In processing your personal data, we act as a data controller. Our contact details are set out in Annex 2.

Please note that generally the data controller of your personal data will be your employing/engaging entity but also entities within the Viacom Group with which we share data for business administration purposes.

**STATUS OF THIS NOTICE**

9. 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 and if so we will issue a revised notice and/or take other steps to notify you of the changes in accordance with applicable laws. Nothing in this notice is intended to create an employment relationship between Viacom and any non-employee.

## ANNEX 1- SUPPLEMENTARY INFORMATION

### WHAT DO WE MEAN BY “PERSONAL DATA” AND “PROCESSING”?

1. “Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you such as your name, identification number, location data, online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity, but also intentions and opinions about you. Personal data can be online and on hard copy documents and in media as mentioned below.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV, video, audio and images captured as part of a production or photographs.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

References in the privacy notice to employment, work (and similar expressions) include any arrangement we may have under which an individual provides us with work or services. By way of example, when we mention an “employment contract”, that includes a contract under which you provide us with services; when we refer to ending your employment, that includes terminating a contract for services. We use the word “you” to refer to anyone within the scope of the notice.

### LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

#### WHAT ARE THE GROUNDS FOR PROCESSING?

2. Under applicable data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses

		effectively and properly and in connection with those interests processing your data.  Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as getting a criminal record check for a role which is regulated and rely on your consent to our doing so.

**PROCESSING SENSITIVE PERSONAL DATA**

3. If we process sensitive personal data about you (for example, storing your health records to assist us in ensuring that we provide you with a healthy and safe workplace or processing personal data relating to diversity monitoring), we will ensure that one of the grounds for processing mentioned above applies, and we will also make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law; and
- Processing based on us having received your explicit consent (although please note as set out above that, in general, processing of your data in connection with employment is not conditional on your consent).

**FURTHER INFORMATION ON THE DATA WE PROCESS AND OUR PURPOSES**

4. The Core Notice outlines the purposes for which we process your personal data. More specific information on these, examples of the data and the grounds on which we process data are in the table below.

The examples in the table cannot, of course, be exhaustive. For example, although the table does not mention data relating to criminal offences, if we were to find out that someone working for us was suspected of committing a criminal offence, we will process that information if necessary for our purposes and to the extent that this would be allowed under the applicable law.

If necessary and to the extent that this would be allowed under the applicable law we will also require criminal background checks for certain roles – for example those working in financial roles or with minors.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided, other background checks, and any information connected with your right to work. We will where necessary and as set out in this privacy notice also process information concerning your health, any disability, and in connection with any adjustments to working arrangements.	Contract Legal obligation Legitimate interests
Your employment contract including entering it, performing it and changing it	Information on your terms of employment including your hours and working patterns and your pay and benefits such as your participation in pension arrangements, life and medical insurance, and any bonus or share schemes.	Contract Legal obligation Legitimate interests
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Contract Legitimate interests
Payroll administration	Information on your bank account, pension contributions and on tax and social insurance.  Your social insurance number or other government issued identifier.  Information on attendance, holiday and other leave and sickness absence.	Contract Legal obligation Legitimate interests
Financial planning and budgeting	Information such as your salary and (if applicable) bonus levels.	Legitimate interests
Supporting and managing your work and performance and any health concerns	Information connected with your work, anything you do at work and your performance including records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other device (and any related monitoring will always be undertaken in a proportionate and as minimally invasive manner as possible).  Performance management information regarding you, including notes of meetings and appraisal records, and information you or our managers enter onto our training or appraisal platforms.  Information relating to your compliance with our policies.	Contract Legal obligation Legitimate interests

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	<p>Information concerning disciplinary allegations, investigations and processes and relating to grievances or complaints in which you are or may be directly or indirectly involved.</p> <p>Information concerning your health, including medical or doctors' notes, return to work plans, and medical and occupational health reports.</p>	
<p>Changing or ending your working arrangements</p>	<p>Information connected with anything that may affect your continuing employment or the terms on which you work including any proposal to promote you, to change your pay or benefits, to change your working arrangements or to end your employment.</p>	<p>Contract</p> <p>Legitimate interests</p>
<p>Physical and system security</p>	<p>CCTV images.</p> <p>Your IT account and directory information.</p> <p>Records of use of swipe and similar entry cards.</p> <p>Records of your use of our systems including computers, phones and other devices and passwords.</p> <p>In exceptional circumstances, we may monitor covertly for other purposes. This will normally only be in circumstances where we reasonably believe covert monitoring is necessary for the detection of criminal or other sufficiently serious activity and which is consistent with the monitoring described in any existing privacy impact assessment. In the event covert monitoring beyond the scope of our privacy impact assessment is required, we will normally conduct an additional assessment. In addition, prior authorisation will normally be sought from our Data Protection Officer.</p>	<p>Legal obligation</p> <p>Legitimate interests</p>
<p>Improving efficiency of IT and business systems and device use, including in connection with Viacom's efforts to maintain, improve and monitor cybersecurity</p>	<p>Records of your use of IT and business systems and Viacom devices.</p> <p>For example, we may collect information on the number of minutes and amount of data used on company mobile phones to ensure employees are on the most cost-effective tariff for their usage.</p> <p>We will where necessary and as set out in this privacy notice also contract with third parties so you can use third party applications on your company devices which may assist with your work (for example an application allowing 'one-click' dial in to conference calls). Such applications will process your personal data. Their own privacy notices will make clear precisely what information will be collected. We may</p>	<p>Legitimate interest</p>

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	be provided with information on the usage of such applications, for example for the purpose of troubleshooting or assessing overall usage and whether to continue to provide them.	
Providing references in connection with your finding new employment	Information on your working for us and on your performance.	Consent Legitimate interests
Providing information to third parties in connection with transactions that we contemplate or carry out	Information on your contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller or outsourcer.	Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age as part of diversity monitoring initiatives. Such data will be aggregated and used for equality of opportunity monitoring purposes. Please note we may share aggregated and anonymised diversity statistics with regulators if formally required / requested.	Legitimate interests
Monitoring and investigating suspicions of misconduct, compliance with policies and rules – both generally and specifically – but always in a proportionate and as minimally invasive manner as possible	We expect our employees and workers to comply with our policies and rules and may monitor our systems to check compliance (e.g. rules on accessing pornography at work). We will where necessary and as set out in this privacy notice check system and other data to look into those concerns (e.g. log-in records, records of usage and emails and documents, CCTV images). In appropriate cases, if we have suspicions of serious wrong-doing, we may make targeted records (e.g. video or sound) in connection with an investigation,	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation
Trade union check off arrangements and Works Council administration	Details of trade union membership and deductions of contributions made at source.  Information relating to Works Council (or similar body) participation, including any communication you send to us if acting for the Works Council (if applicable).	Contract Legal Obligation
Day to day business operations including marketing and customer/client relations and travel on our behalf	Information relating to the work you do for us, your role and contact details including relations with current or potential customers or clients. This may include a picture of you for internal or external use.  Information regarding your travel arrangements and location.	Legitimate interests

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Maintaining appropriate business records during and after your employment	Information relating to your work, anything you do at work and your performance relevant to such records.	Contract Legal obligation Legitimate interests

<b><i>Other processing activities that apply to cast, crew, production and talent</i></b>		
<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Enabling the creation, sale and distribution / broadcast of a production you are working on including, but not limited to, marketing purposes	Information connected with your role including (if applicable) records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other device.  If you have an on-screen or voiceover role this will likely involve processing images / video / audio of you.	Contract Legal obligation Legitimate interests

**WHERE THE DATA COMES FROM**

5. When you start employment with us, the initial data about you that we process is likely to come from you: for example, contact details, bank details and information on your immigration status and whether you can lawfully work. We will, where necessary and as set out in this privacy notice, also require references and information to carry out background checks including information on your credit or criminal history, if that is required for your job role. In the course of employment, you may be required to provide us with information for other purposes such as sick pay and family rights (e.g. maternity and paternity leave and pay). If you do not provide information that you are required by statute or contract to give us, you may lose benefits or we may decide not to employ you or to end your contract. If you have concerns about this in a particular context, you should speak to HR.
6. In the course of your work, we may receive personal data relating to you from others. Internally, personal data may be derived from your managers and other colleagues or our IT systems; externally, it may be derived from our customers or those with whom you communicate by email or other systems.

**WHO GETS TO SEE YOUR DATA?**

**INTERNAL USE**

7. Where necessary and as set out in this privacy notice, your personal data will be disclosed to your managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We will where necessary and as set out in this privacy notice also disclose this to other members of our group companies.

**EXTERNAL USE**

8. We will only disclose your personal data outside our group companies if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

We will disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy). Where necessary, we will also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

9. Specific circumstances in which your personal data may be disclosed include:

- Disclosure to organisations that process data on our behalf such as our payroll service, insurers and other benefit providers, our bank and organisations that host our IT systems and data;
- Disclosure to external recipients of electronic communications (such as emails) which contain your personal data;
- Disclosure on a confidential basis to a potential buyer of our business or company for the purposes of evaluation – but only if we were to contemplate selling;
- If you have an on-screen role, disclosure of footage, images, or audio recordings of you as part of the broadcasting, distribution and marketing of the production. Or, whether you have an on-screen or off-screen role, to allow us to credit your role;
- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request;
- To third parties for the purpose of assessing efficiency of IT or business system device usage. In such cases the data sent to the third party will be anonymised where possible;
- Disclosure as part of any marketing campaign for a production;
- Disclosure and transfer disclosed to respond to law enforcement agency requests or where required by applicable laws, pursuant to court orders, or arbitral or tribunal orders or rules of procedure, or to government regulations departments or agencies or regulatory bodies (including disclosures to tax and employment authorities), employment and any other regulatory bodies;
- Disclosure on a confidential basis to our advisers for example to our lawyers for the purposes of seeking legal advice or to further our interests in legal proceedings and to our accountants for auditing purposes; and
- Disclosure to our insurers.

#### **RETAINING YOUR PERSONAL DATA – MORE INFORMATION**

10. Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for the duration of your employment and for a period afterwards. In considering how long to keep it, we will take into account its relevance to our business and your employment either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV or a record of a holiday request), we will delete it in accordance with this privacy notice.

Some data, such as production footage itself and credit information, will be kept indefinitely as we have an ongoing legitimate interest in retaining the product.

## **TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA – MORE INFORMATION**

11. In connection with our business and for employment, administrative, management and legal purposes, we will where necessary and as set out in this privacy notice transfer your personal data outside the EEA to members of our group of companies and data processors in the US and on occasion other jurisdictions in which we are established. Some of our systems (for example, our HR Information system which is called PeopleSoft) are hosted in the US. We will ensure that any transfer is lawful and that there are appropriate security arrangements.

Although there is no decision by the European Commission that the US provides an adequate level of protection, Viacom Inc. and our US group companies are Privacy Shield certified. In some cases, we have also entered into agreements ensuring appropriate and suitable safeguards with processors outside the EEA. These are in standard terms approved by the Commission.

If you wish to see details of any of these safeguards or agreements, please contact your local BALA resource.

## **ACCESS TO YOUR PERSONAL DATA AND OTHER RIGHTS**

12. We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including:

- Giving you a description and copy of the personal data
- Telling you why we are processing it

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

## **COMPLAINTS**

13. If you have complaints relating to our processing of your personal data, you should raise these with HR in the first instance or with the Viacom Data Protection Officer. You may also send complaints or any other inquiries regarding your personal data to [EmployeePrivacyRights@viacom.com](mailto:EmployeePrivacyRights@viacom.com). Finally, you may also raise complaints with your statutory regulator. For contact and other details ask HR.

## **JOURNALISTIC EXEMPTION (IN RELATION TO CAST, CREW, PRODUCTION AND TALENT)**

14. Please note that owing to the nature of the work that you do for us (i.e. working on our or third parties’ productions) on some occasions Viacom and group companies or third parties will rely on exemptions to data protection rules in relation to journalistic freedom, the right to artistic expression or more generally, the right to freedom of expression (as mentioned in

Article 85 of the General Data Protection Regulation and in various jurisdictions' data protection rules).

**STATUS OF THIS NOTICE**

- 15. 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 Viacom and any non-employee.

**ANNEX 2 – INFORMATION SPECIFIC TO JURISDICTIONS**

**Belgium**

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

The statutory regulator is the Data Protection Authority (in Dutch: 'Gegevensbeschermingsautoriteit' / in French: 'l'Autorité de protection des données').

The Data Controller is the entity listed below and its affiliates:	Address:
VIMN Belgium BvbA	Havenlaan 86c 1000 Brussels

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

In addition:

- If we would like to process (reproduce/disclose) your picture, we will ask for your consent. This does not apply to pictures you have voluntarily provided to us (such as in your CV) if we have another legal basis to process it.

## 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 statutory regulator is Úřad pro ochranu osobních údajů.

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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

In addition:

- The Czech data protection legislation does not include any specific provisions on processing sensitive personal data for equality and diversity purposes. Therefore, we do not process sensitive data for these purposes without your consent.
- Your activity on the company's intranet, internet, access logs, web history and searches, as well as access and usage of emails and documents, may be monitored for the purposes of compliance with our policies and rules, which is in the legitimate interest of Viacom. However, in the event we come upon a private (i.e. non work related) electronic communication or any other private data, we will not monitor or check the contents of such communication or data.
- We will not include a picture of you for internal or external use without your consent.

## Denmark

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

The statutory regulator is the Datatilsynet (the Danish Data Protection Agency).

<https://www.datatilsynet.dk/forside/>

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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

## Finland

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

The statutory regulator is Tietosuojavaltuutettu (the Data Protection Ombudsman) (<http://tietosuoja.fi/en/index.html>)

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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

In addition:

- We collect personal data primarily directly from you. If we collect personal data from elsewhere, we will do so only with your consent. In any event, we will notify you of the collection of your personal data from such external sources prior to making any decisions based on that information.
- All communications from you, including all messages and all documents attached thereto, are confidential. We do not retrieve or open your e-mails, private files or other files containing your communications, unless you have expressly consented to this or it is specifically permitted by law.
- When monitoring our systems to check compliance, we do not access your emails or web browsers' logs, or monitor your internet use.
- All information concerning your health is retained separately from your other personal data we process

## France

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

The statutory regulator is the Commission Nationale de l'Informatique et des Libertés (CNIL).

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- Personal data regarding the system of income tax withholding at source (including your tax contribution rate) will be collected and processed consistent with this notice effective 1st January 2019.

## Germany

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

The statutory regulator is

Baden-Wuerttemberg	Der Landesbeauftragte für den Datenschutz in Baden-Württemberg	<a href="https://www.baden-wuerttemberg.datenschutz.de/">https://www.baden-wuerttemberg.datenschutz.de/</a>
Bavaria	Bayerisches Landesamt für Datenschutzaufsicht	<a href="https://www.lida.bayern.de/de/index.html">https://www.lida.bayern.de/de/index.html</a>
Berlin	Berliner Beauftragter für Datenschutz und Informationsfreiheit	<a href="https://www.datenschutz-berlin.de//">https://www.datenschutz-berlin.de//</a>
Brandenburg	Die Landesbeauftragte für den Datenschutz und für das Recht auf Akteneinsicht	<a href="http://www.lida.brandenburg.de">http://www.lida.brandenburg.de</a>
Bremen	Die Landesbeauftragte für Datenschutz und Informationsfreiheit	<a href="https://www.datenschutz.bremen.de">https://www.datenschutz.bremen.de</a>
Hamburg	Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit	<a href="http://www.datenschutz-hamburg.de">http://www.datenschutz-hamburg.de</a>
Hessen	Der Hessische Datenschutzbeauftragte	<a href="http://www.datenschutz.hessen.de">http://www.datenschutz.hessen.de</a>
Lower Saxony	Die Landesbeauftragte für den Datenschutz Niedersachsen	<a href="https://www.lfd.niedersachsen.de">https://www.lfd.niedersachsen.de</a>
Mecklenburg-Western Pomerania	Der Landesbeauftragte für Datenschutz und Informationsfreiheit Mecklenburg-Vorpommern	<a href="https://www.datenschutz-mv.de">https://www.datenschutz-mv.de</a>
North Rhine-Westphalia	Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen	<a href="https://www.lidi.nrw.de/">https://www.lidi.nrw.de/</a>
Rhineland-Palatinate	Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Rheinland-Pfalz	<a href="https://www.datenschutz.rlp.de/de/startseite/">https://www.datenschutz.rlp.de/de/startseite/</a>

Saarland	Landesbeauftragte für Datenschutz und Informationsfreiheit	<a href="http://www.datenschutz.saarland.de">http://www.datenschutz.saarland.de</a>
Saxony	Der Sächsische Datenschutzbeauftragte	<a href="https://www.saechsdsb.de">https://www.saechsdsb.de</a>
Saxony-Anhalt	Landesbeauftragter für den Datenschutz Sachsen-Anhalt	<a href="http://www.datenschutz.sachsen-anhalt.de">http://www.datenschutz.sachsen-anhalt.de</a>
Schleswig-Holstein	Unabhängiges Landeszentrum für Datenschutz Schleswig- Holstein	<a href="https://www.datenschutzzentrum.de">https://www.datenschutzzentrum.de</a>
Thuringia	Thüringer Landesbeauftragter für den Datenschutz und die Informationsfreiheit	<a href="http://www.tlfdi.de/tlfdi/">http://www.tlfdi.de/tlfdi/</a>

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- The German data protection legislation does not include any specific provisions on processing personal data for equality and diversity purposes. Therefore, we do not process sensitive data for these purposes without your consent.

## Hungary

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

The statutory regulator is National Data Protection and Freedom of Information Authority.

<http://www.naih.hu/>

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- An employee's consent shall be required for producing or using his/her photo or video. To produce a photo of the employee, the required consent may be granted by implicit conduct of the employee as well. If the employee knows that in the room where he/she enters, photos and/or videos may be taken, this shall constitute consent by implicit conduct. However, to use (e.g., make public) these photos and videos, explicit consent is required.

## Ireland

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

The statutory regulator is the Data Protection Commissioner.

The Data Controller is the entity listed below and its affiliates:	Address
Paramount Pictures Services UK	2 <sup>nd</sup> Floor Morrison Chambers, 32 Nassau Street, Dublin

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- There is no legal obligation in Ireland for employers to collect sensitive personal data for equality and diversity reporting purposes. Therefore, we do not process sensitive data for these purposes without your consent.
- The applicable legislation in Ireland on exemptions to data protection rules in relation to journalistic freedom, the right to artistic expression or more generally, the right to freedom of expression is set out in section 22A of the Data Protection Acts 1988 and 2003 and section 37 of the draft Data Protection Bill 2018.

## Italy

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

The statutory regulator is Autorità Garante della Privacy.

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- There is no legal obligation in Italy for employers to collect sensitive personal data for equality and diversity reporting purposes. Therefore, we do not process sensitive data for these purposes without your consent.
- In addition, any kind of background checks will be carried out only if strictly necessary in connection with the duties assigned.

## Netherlands

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

The statutory regulator is Autoriteit Persoonsgegevens. Mailbox 93374, 2509 AJ THE HAGUE.  
Phone: (+31) – (9)70 88 85 00.

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

In addition:

- All information concerning the nature of your health is retained separately at the Company Doctor or the Health and Safety service. Your employer does not have access to information concerning the nature of your health.
- Data regarding nationality, race and ethnic origin may be processed in order to give subjects a privileged position within the organisation (monitoring diversity / equal opportunities). However, the processing will no longer be allowed if the subject requests in writing that processing of nationality, race and ethnic origin data be ceased.
- Data regarding disability may be processed for monitoring diversity / equal opportunity purposes, in order to meet the requirements of the “Act Job appointments and Employment disabled persons”.
- With regard to the other mentioned sensitive data (with the exception of age), we will not process this data for the purposes of monitoring of diversity and equal opportunities purposes.

## Norway

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

The statutory regulator is the Datatilsynet (The Norwegian Data Protection Authority).

<https://www.datatilsynet.no/en/>

The Data Controller is the entity listed below and its affiliates:	Address
VIMN Nordic AB filial i Norge and its affiliates	Nedre gate 7, 0551 Oslo

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- Any monitoring and investigation of employee data such as CCTV monitoring, CCTV images, records of system and data use, swipe and entry cards, log-in records, records of usage of emails and documents will only be conducted to the extent permitted by applicable local law.

## Poland

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

The statutory regulator is the Prezes Urzędu Ochrony Danych Osobowych (The President of the Personal Data Protection Office).

T (22) 531 03 00 F (22) 531 03 01 online application form:

[https://ewnioski.biznes.gov.pl/suppliant/upage/general/unauth\\_step0\\_page?eservice=0000&type=procadura,wniosek&referer=external&institutionID=45](https://ewnioski.biznes.gov.pl/suppliant/upage/general/unauth_step0_page?eservice=0000&type=procadura,wniosek&referer=external&institutionID=45)

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

## Portugal

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

The statutory regulator is Comissão Nacional de Protecção de Dados (CNPD).

The Data Controllers are the entities listed below and each of their affiliates:	Address
MTV Networks Unipessoal Lda	Torre Ocidente, Rua Galileu Galilei, 2 – 4ºA 1500-392 Lisboa
MTV Ownership (Portugal), Lda	Torre Ocidente, Rua Galileu Galilei, 2 – 4ºA 1500-392 Lisboa

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- Portuguese data protection legislation does not include any specific provisions on processing personal data for equality and diversity purposes. Therefore, we do not process sensitive data for these purposes without your consent.

## Spain

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

The statutory regulator is the Spanish Data Protection Authority.

The Data Controllers are the entities listed below and each of their 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

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

- You may use any of the forms we have produced to exercise any of the data protection rights you are entitled to (right to make a subject access request, right to have your personal data rectified or erased, right to object to its processing or to have its processing restricted and to be given the data in machine readable format for transmitting to another data controller). However, you may also use any of the forms drafted by the Spanish Data Protection Agency for this purpose. Such forms, duly signed and with a copy of your ID Card, shall be submitted in person to us or sent by mail post or email to the addresses mentioned in the data controller chart above.
- Likewise, you will be entitled to submit a complaint before the Spanish Data Protection Agency in the event you consider that we, as the Data Controller, have not adequately addressed the exercise of your rights.
- The maximum term to resolve or otherwise respond to your request will be 1 month from the date your request was submitted.
- In the event any modification to your data takes place, please keep us duly informed (in writing) to keep your personal data duly updated.

**Sweden**

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

The statutory regulator is Datainspektionen (soon to change to Integritetsskyddsmyndigheten).

The Data Controllers are the entities listed below and each of their affiliates:	Address
VIMN Nordic AB	Kungsbro Strand 31, 112 26 Stockholm
Paramount Sweden AB	Kungsbrostrand 31, 112 26 Stockholm

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

**Switzerland**

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

The statutory regulator is the Federal Data Protection and Information Commissioner.

The Data Controller is the entity listed below and its affiliates:	Address
VIMN Switzerland AG	Bellerivestrasse 11 8008 Zürich

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

## United Kingdom

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

The statutory regulator is the ICO.

The Data Controllers are the entities listed below and each of their 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 W4 5YA
Paramount Pictures International Limited	Building 5 566 Chiswick High Road, W4 5YF
Paramount Pictures UK	Building 5 566 Chiswick High Road, W4 5YF

Employer Contact	Company	E-mail address
Data Protection Officer	Viacom Inc.	EmployeePrivacyRights@viacom.com

Please note that this Privacy Notice, along with other related Viacom policies and/or protocols, shall form Viacom's policy for processing special data as required by the UK Data Protection Bill 2018 (Schedule 1 Part IV).