

COVID-19 Privacy Notice

Last updated January 19, 2021

What is the purpose and scope of this document?

This COVID-19 Privacy Notice (“**Notice**”) describes how we collect, use, and disclose your personal information in the context of our response to the COVID-19 pandemic and our relationship with you (“**personal information**”).

In this Notice, we will use the terms “NBCUniversal,” “we,” “us” and “our” to refer to:

- **For Productions:** the NBCUniversal company that is producing or commissioning that production or event, if you are directly or indirectly employed or engaged by, or otherwise participate in, a NBCUniversal production or event (“**Production**”), or are accompanying someone who is doing so.
- **For Workforce:** the company that employs you or engages you or (if you are employed by a vendor) that has engaged your employer to provide services to it, if you are an employee, contractor or other individual who provide services to NBCUniversal in a non-production context (collectively, “**workforce**”).

NBCUniversal is the “**data controller**” of your personal information. This means that it is responsible for how it holds and uses personal information about you.

This Notice only applies to our relationship with you in the context of our response to COVID-19. Other aspects of our relationship may be governed by the terms of other privacy policies or notices that have been provided to you separately.

We may update this Notice from time to time.

The kind of information we collect about you under this notice

As part of our ongoing efforts to maintain the health and safety of our Production or workforce, we collect, store, use, and share various types of personal information about you. We collect this information either directly from you, or from another person or entity, or through the use of technology (e.g. wearable devices, mobile phone apps). The kind of information we collect about you may include, where applicable:

- Demographic information such as name, phone number, address and gender;
- Information regarding potential exposure to COVID-19;
- Information about potential symptoms;
- Information about pre-existing conditions or heightened health risk factors;
- Information about a diagnosis of COVID-19 or your immunity to it, where you have disclosed this to us, or where we have collected it based on your separate authorization; and
- Information about compliance with COVID-19 safety guidelines.

What will we do with your personal information collected under this notice?

We will use the above information to help protect the **health and safety** of our Production or workforce (for example, by restricting potentially infectious individuals from attending our facilities or locations, or providing notice of potential health or safety issues identified through contact tracing); to **support our Production or workforce**; to assess your **fitness to work or participate**; to conduct **production or workforce planning, management, and other operational activities in our legitimate interests** (e.g. to make decisions related to COVID-19 absences, to organize COVID-19 testing or vaccinations and monitor testing progress and capacity, or to conduct risk or trend analysis); to comply with (or exercise rights under) **laws, regulations and contracts**; and (if necessary) to protect your **vital interests**.

Who will your personal information be disclosed to under this notice?

We will disclose your personal information to the following types of entities (where applicable):

- We share your personal information with **people within NBCUniversal, NBCUniversal group companies, and Comcast** (our ultimate parent company) who have a “need to know” that information to carry out the purposes described in this Notice. This includes, as applicable, relevant personnel within NBCUniversal (such as production or workforce management, COVID-19 compliance personnel and Human Resources) and NBCUniversal Group functions such as HR, Business Continuity & Crisis Management, Environment, Health & Safety, and Legal, and Comcast Medical. As part of a global company doing business across national borders, there are situations where personal information will need to be transferred to NBCUniversal group or Comcast entities in the United States, the United Kingdom or another country, including countries whose laws may provide no or less legal protection for personal information. However, we take the privacy and security of your personal information very seriously, and we take steps to protect your personal information in every country where it is held or accessed, including by putting in place appropriate safeguards such as the European Commission approved or other appropriate data transfer agreements.
- We share personal information with **government health agencies, unions** and other entities as required by law or regulation, or if compelled to do so by judicial or administrative process.
- **If you test positive for COVID-19**, we may conduct **contact tracing** to identify and warn individuals with whom you had contact at the Production or workplace while infectious. With your separate consent, unless otherwise required by applicable law, we may disclose your name and COVID-19 positive status to those individuals or their employers, in order to alert them of the need to take steps to protect themselves and others.
- Where appropriate, we share certain personal information with authorized third-party **service providers**, such as healthcare providers, lodging providers (e.g. hotels), security providers, production services providers and insurers. These third-party suppliers may be based in the United States or another country. It is our practice to require our third-party suppliers to take appropriate security measures to protect personal information, and to require them to put in place measures to ensure that your personal information is treated by them in a way that is consistent with, and which respects, applicable laws on data protection, such as European Commission approved or other appropriate data transfer agreements.
- We may share your personal information with your **employer**, if you are not an NBCUniversal employee (e.g. if you are a contractor or employed by a vendor), for workforce or workplace health and safety, operational or contractual reasons.
- We may disclose your personal information to a **provider of healthcare** to facilitate the ordering and administration of COVID-19 tests, test results and vaccinations, or to aid any treatment or diagnosis of you where you are unable to authorize the disclosure.
- We may share your information if relevant in a **lawsuit, arbitration, grievance, or other claim or challenge** to which you and NBCUniversal are parties and where your physical health may be at issue.
- **If you work on, or participate in, a Production:** We may share certain personal information with a **platform** which intends to exhibit the Production, with a **co-production partner**, or with the **distributor** of the Production (each, a “**Partner**”), as applicable. The Partner may receive production documents containing your personal information (e.g. call sheets, executed agreements) from NBCUniversal. In addition, if required from time to time, we may notify the Partner of changes in the availability of individuals engaged in the Production, for example, if they have tested positive for COVID-19, are required to self-isolate, or are unable to participate in the Production for other reasons. The Partner will process these documents and information to make creative decisions, maintain production records, production management and administration, risk management and administration, exercise or defend its legal rights, and comply with legal, regulatory and contractual obligations. In so doing, the Partner may disclose your personal information to group companies and third-party suppliers.
- **If you are a participant in a Production** and your COVID-19 status or compliance with related orders and safety protocols impacts your participation in the Production or the promotion thereof, we may disclose your COVID-19 status to the **general public**.

How We Protect Your Personal Information

We maintain organizational, technical, and physical safeguards to help protect the information we collect and use. These safeguards vary depending upon a variety of factors including the sensitivity of the information we collect and use. Despite all reasonable practices, no security method is infallible.

Exercising Data Rights

Under certain circumstances, in certain jurisdictions you may have the legal right to:

- Request **access** to your personal information. This would enable you to receive a copy of the personal information that we hold about you;
- Request **correction** of the personal information that we hold about you. This would enable you to have any incomplete or inaccurate information we hold about you corrected;
- Request **erasure** of your personal information. This would enable you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You may also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **Object** to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
- Request the **restriction** of processing of your personal information. This would enable you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing;
- Request the **transfer** of your personal information to another party; and
- Withdraw your consent for the processing of your personal information.

If you would like to exercise any of your data rights, or if you have any questions or concerns about how we have used your personal information, please contact the NBCUniversal Privacy Department at Productions.Privacy@nbcuni.com (Productions) or Privacy.operations@nbcuni.com (workforce). You may have the right to make a complaint at any time to the data protection authority in your country about our collection and use of your personal information, but we hope that you will contact us first to give us a chance to resolve your concerns.

Retaining Your Personal Information

We will keep your personal information for as long as is necessary to fulfill the purposes we collected it for, including to satisfy legal, regulatory, and reporting requirements.

NBCUniversal Privacy Department Contact Details:

Chief Privacy Officer, NBCUniversal Legal Department, 30 Rockefeller Plaza, New York, NY 10112, USA

Productions.Privacy@nbcuni.com (Productions) or Privacy.operations@nbcuni.com (workforce)