

NBCUniversal

Covid-19 Workforce Privacy Notice Last updated July 21, 2020

What is the purpose and scope of this document?

NBCUniversal is committed to the privacy and security of the personal information of its workforce. This COVID-19 Workforce Privacy Notice (“**Notice**”) describes how we collect, use, and disclose personal information about our employees, contractors and other individuals who provide services to us (collectively, “**workforce**”) in the context of our response to the COVID-19 pandemic and our working relationship with you (“**workforce personal information**” or “**your information**”). This Notice supplements any other workforce privacy notice that may have been provided to you, and we may update it at any time. This Notice does not form part of any contract of employment or contract to provide services.

In this Notice we will use the terms “NBCUniversal”, “we”, “us” and “our” to refer to 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, and other companies in the NBCUniversal group of companies.

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 workforce, we collect, store, use and share various types of personal information about our workforce. We collect this information either directly from you or (where applicable) from your employer (e.g. if you are a contractor or employed by a vendor), 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:

- 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.

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

We will use information about your **physical health** to help protect the health and safety of our workforce and workplace (for example, by restricting potentially infectious individuals from attending the workplace, or providing notice of potential health or safety issues identified through contact tracing); to support our workforce; to assess your fitness to work; to conduct workforce planning, management and other operational activities (for example, to make decisions related to COVID-19 leaves of absence which may involve staffing considerations, or to conduct risk or trend analysis); to comply with (or exercise rights under) employment and other laws and regulations, and our contractual obligations; and (if necessary) to protect your vital interests.

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

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

- We share your information with people within NBCUniversal and Comcast 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 and NBCUniversal group functions such as Human Resources, Business Continuity & Crisis Management, Environment, Health & Safety, Legal and Comcast Medical.
- We share workforce personal information with government health agencies as required by law, 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 workforce members with whom you had contact while infectious. With your separate consent, we may disclose

your name and COVID-19 positive status to those workforce members, in order to alert them of the need to take steps to protect themselves and others.

- Where appropriate, we share certain workforce personal information with authorized third-party service providers, such as healthcare providers, security providers, HR management and administration suppliers and technology suppliers. It is our practice to require our third-party suppliers to take appropriate security measures to protect personal information, and to only allow them to process personal information for specified purposes and in accordance with our instructions.
- We may share your workforce 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 workforce personal information to a provider of healthcare 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.

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.

Privacy Department Contact Details:

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