

VIACOM SAFE HARBOR PRIVACY POLICY

Viacom, Inc. respects individuals' privacy, and strives to collect, use and disclose personal information in a manner consistent with the laws of the countries in which it does business. This Safe Harbor Privacy Policy (the "**Policy**") describes the privacy principles Viacom follows with respect to personal information it receives from the European Economic Area and Switzerland.

SAFE HARBOR OVERVIEW

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions to enable U.S. companies to satisfy European Union ("**EU**") law requiring that Personal Data transferred from the EU to the United States be adequately protected (the "**U.S.-EU Safe Harbor**"). The European Economic Area (the "**EEA**"), which includes all member states of the EU, Iceland, Liechtenstein and Norway, has recognized the U.S.-EU Safe Harbor as providing adequate protection of Personal Data (2001 O.J. (L 45) 47). The United States Department of Commerce and the Federal Data Protection and Information Commissioner of Switzerland (the "**Commissioner**") have agreed on a similar set of data protection principles and frequently asked questions to satisfy the Swiss law requirement that adequate protection be given to Personal Data transferred from Switzerland to the United States (the "**U.S.-Swiss Safe Harbor**"). Consistent with its commitment to protect personal privacy, Viacom adheres to the principles set forth in the U.S.-EU Safe Harbor and the U.S.-Swiss Safe Harbor (collectively, the "**Safe Harbor Principles**").

SCOPE

This Policy applies to all Personal Data received by Viacom in the United States from the EEA and Switzerland, either directly from individuals or from its subsidiaries.

DEFINITIONS

"**Agent**" means any third party that processes, collects or uses Personal Data under the instructions of, and solely for, Viacom or to which Viacom discloses Personal Data for use on Viacom's behalf.

"**Personal Data**" means any information or set of information that (1) is transferred from the EEA or Switzerland to the United States, (2) recorded in any form and (3) identifies or is used by or on behalf of Viacom to identify any individual. Personal Data does not include anonymized information, aggregated information or publicly available information that has not been combined with non-public personal information.

"**Sensitive Personal Data**" means Personal Data of any individual that: (a) reveals such individual's race; ethnic origin; political opinions, religious, ideological or philosophical beliefs; or trade union membership, views or activities; (b) reveals such individual's health or sex life, information about social security benefits, or information on criminal or administrative

proceedings and sanctions other than in the context of pending proceedings or (c) is received from a third party where that third party validly identifies and treats the information as sensitive personal data with respect to such individual pursuant to the EU Data Directive.

“**Viacom,**” “**we,**” “**our**” or “**us**” means Viacom, Inc., its successors, subsidiaries, divisions and groups in the United States.

PRIVACY PRINCIPLES

The privacy principles set forth in this Policy have been developed based on the Safe Harbor Principles.

NOTICE: When Viacom collects Personal Data directly from individuals in the EEA and Switzerland, it will inform them about the purposes for which it collects and uses Personal Data about them, the types of non-Agent third parties to which Viacom discloses that Personal Data, the choices and means, if any, Viacom offers individuals for limiting the use and disclosure of their Personal Data, and how to contact Viacom about its practices concerning Personal Data. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Data to Viacom, or as soon as practicable thereafter, and in any event before Viacom uses or discloses the information for a purpose other than that for which it was originally collected.

Purposes for which we may collect and use Personal Data from our employees and job applicants include:

- Carrying out human resources functions such as training, implementing career and succession planning, administering employee contracts, evaluating employees, implementing employment-related actions and obligations and providing employment benefits and related information.
- Enabling Viacom and its employees to contact one another using an employee’s work telephone and fax numbers, e-mail address or mailing address.
- Administering compensation, bonus and benefits plans and other employment matters.
- Arranging, booking and implementing employees’ travel plans and arrangements for business related purposes.
- Enabling Viacom to maintain building security and employee security, health and safety.
- Transferring Personal Data in connection with Viacom’s legal, regulatory compliance and auditing purposes.
- Facilitating Viacom’s internal administrative and analytics purposes, such as project staffing, headcount and statistics initiatives.
- Complying with Viacom’s legal obligations, policies and procedures.

Purposes for which we may collect and use Personal Data from our customers, consumers and other non-employees include:

- Responding to individual’s inquiries, including in connection with prospective employment at Viacom, and administering and processing an individual’s employment application to Viacom.
- Communicating to individuals about our products, services and related issues.

- Notifying individuals of, and administering, contests, sweepstakes, promotions and other offers.
- Evaluating the quality of our products and services.
- Allowing individuals to register for our Web sites, online communities and other social networking services, and administering and processing these registrations.
- Enhancing or customizing an individual's experience on our Web sites.
- Processing transactions including subscriptions and purchases.
- Transferring Personal Data in connection with Viacom's legal, regulatory compliance and auditing purposes.
- Facilitating Viacom's internal administrative and analytics purposes, maintaining and administering Viacom's websites and complying with Viacom's legal obligations, policies and procedures.

Where Viacom receives Personal Data from its subsidiaries, affiliates or other entities in the EEA or Switzerland, it will use and disclose such Personal Data in accordance with the notices provided by such entities and the choices made by the individuals to whom such Personal Data relates.

We may share Personal Data within the U.S. family of Viacom companies. We may also disclose Personal Data to our Agents in the United States and other third parties when required to do so under law or by legal process. We do not use Personal Data for purposes incompatible with the purposes for which the information was originally collected without notifying the relevant individuals of such uses and offering an opportunity to opt out.

CHOICE: Viacom will allow individuals whose Personal Data is collected in the EEA or Switzerland and transferred to the United States to choose (by either opt-out or opt-in) whether their Personal Data can be (1) disclosed to a third party that is not an Agent or (2) used for a purpose other than the purpose for which it was originally collected or subsequently authorized by that individual.

For Sensitive Personal Data, Viacom will give individuals the opportunity to affirmatively and explicitly consent (opt in) to permit Viacom to (1) disclose Sensitive Personal Data to a third party that is not an Agent or (2) use Sensitive Personal Data for a purpose than the purpose for which it was originally collected or subsequently authorized by the individual.

Viacom will provide individuals with clear and conspicuous, readily available, and affordable mechanisms to exercise these choices.

ONWARD TRANSFER: Viacom will obtain assurances from its Agents that they will safeguard Personal Data in a manner consistent with this Policy. Examples of appropriate assurances that may be provided by Agents include: (1) the Agent's certification that they participate in the U.S.-EU Safe Harbor or the U.S.-Swiss Safe Harbor, (2) a contract requiring the Agent to provide at least the same level of protection as is required by the Safe Harbor Principles, (3) being subject to the EU Data Protection Directive (EU Directive 95/46/EC), the Swiss Federal Act on Data Protection or another law providing an adequate level of privacy protection. Where Viacom has knowledge that an Agent is using or disclosing Personal Data in

a manner contrary to this Policy, Viacom will take reasonable steps to prevent or stop the use or disclosure.

SECURITY: Viacom will take reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration or destruction. As necessary, Viacom will take additional precautions regarding the security of Sensitive Personal Data. While Viacom strives to secure Personal Data, even reasonable security measures do not guarantee the security of any information, and Viacom cannot guarantee that the Personal Data it seeks to protect will be protected in all circumstances, including those beyond its reasonable control. Records containing Personal Data are considered Viacom property and should be afforded confidential treatment at all times, regardless of whether these records are in electronic or paper form.

DATA INTEGRITY: Viacom will use Personal Data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Viacom will also take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete and current.

ACCESS: Upon request and in accordance with the Safe Harbor Principles, Viacom will grant individuals reasonable access to their Personal Data that is held by Viacom. In addition, Viacom will take reasonable steps to permit individuals to correct, amend or delete Personal Data that is demonstrated to be inaccurate or incomplete. Viacom may limit or deny access to Personal Data as permitted by the Safe Harbor Principles. For example, Viacom may limit an individual's access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy or where the legitimate rights of persons other than the individual would be violated.

With respect to Personal Data of employees and job applicants, Viacom will provide such access either directly or through the employer located in the EEA or Switzerland.

ENFORCEMENT: Viacom has established procedures for periodically verifying its compliance with the Safe Harbor Principles, including an annual self-assessment of its relevant privacy practices to confirm the accuracy of, and verify its adherence to, this Policy. Viacom will investigate suspected infractions of this Policy. Any employee that Viacom determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

Any questions or concerns regarding the use or disclosure of Personal Data should be directed to Director, Global Compliance at the address listed below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the Safe Harbor Principles. For complaints that cannot be resolved through our internal process: (1) for Personal Data received from the EEA, Viacom will participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles and (2) for Personal Data received from Switzerland, Viacom will cooperate with, and comply with any advice given by, the Commissioner in the investigation and resolution of complaints brought under the US.-Swiss Safe Harbor.

CONTACT INFORMATION

Please submit questions or comments regarding this Policy or our practices concerning Personal Data to:

Director, Global Compliance
Viacom
1515 Broadway
New York, NY 10036
linda.davidoff@viacom.com

LIMITATIONS

Viacom's adherence to the Safe Harbor Principles may be limited by any applicable legal, regulatory, ethical or public interest consideration and as expressly permitted or required by any applicable law, rule or regulation. Examples of such limitations include, without limitation, exceptions to the opt-in requirements for Sensitive Personal Data as permitted by Commission Decision 2000/520/EC of 26 July 2000, exceptions to access as permitted by the Safe Harbor Principles, or under applicable EEA member state or Swiss law. Viacom may also sell, transfer or otherwise disclose Personal Data reasonably related to the sale, assignment, transfer or other disposition of all or part of our business, subject to and in accordance with applicable law.

CHANGES TO THIS POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. Appropriate notice will be given concerning any such amendment.

EFFECTIVE DATE

This Policy is effective as of September 15, 2011.

