

## Sample Social Media Policy

Social media can be a rewarding way to share your life and opinions with family, friends, the campus and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use regarding the official (Company-owned social media accounts and/or otherwise on behalf of Company) and non-official (personal) use of social media and social networking services and tools by Company employees. Company defines "social media" broadly to include online platforms and forums that facilitate activities such as professional or social networking, posting commentary or opinions, and sharing pictures, audio, video or other content (hereafter collectively, "social media"). This policy encompasses and applies to all types of social media content and services including, but not limited to:

- Media Sharing – Examples: YouTube, Flickr, iTunes
- Blogging/Microblogging – Examples: WordPress, Blogger
- Social Networking – Examples: Facebook, LinkedIn, Twitter
- Document and Data Sharing Repositories – Examples: Google Docs, Dropbox, OneDrive
- Social Bookmarking – Examples: Digg, Reddit, Tumblr, Pinterest

This policy applies to all employees who work for the Company.

### **Official Use of Social Media and Social Networking at Company**

All Company social media accounts are owned by Company. The Marketing Department has sole authority to manage, administer, and post to these accounts. At this time, these accounts include the following [as applicable]:

- Twitter: @ \_\_\_\_\_
- Facebook: \_\_\_\_\_
- YouTube: \_\_\_\_\_
- LinkedIn: \_\_\_\_\_
- SlipCase: \_\_\_\_\_

This means that any personas or posts you may create via one of the Company-owned accounts are the Company's. In addition, any "Followers," "Friends," "Subscribers," "Connections," or other interaction you may receive via a Company-owned account is the Company's.

Company is responsible for all the content published on social media. Be aware that any posted content becomes part of the public record, is considered to be in the public domain, is available indefinitely, and has the potential to be published and discussed in various media outlets. As a consequence, social media posts can quickly become unmanageable and damage Company's reputation.

Company's overall goal is simple: to actively participate in the online community in a respectful, relevant way that protects and enhances our reputation and ensures a positive campus experience, while adhering to the letter and spirit of the law.

Disclosure of information that is deemed time or content-sensitive, *i.e.*, marketing initiatives; pending legal matters; property negotiations; etc., may not be disseminated.

Failure to comply may result in disciplinary action, up to and including termination of employment.

Once given approval to speak on Company's behalf on social media, the important guidelines (as applicable) below should be followed.

### **Non-Official/Personal Use of Social Media and Social Networking**

Company encourages its employees to be ambassadors of goodwill and to join the online community to share Company's mission, goals, and messages. The Company respects the right of its employees to use social media during non-working time as a medium of self-expression. You should bear in mind, however, that although social media is generally viewed as a medium of self-expression, the posting of certain comments and information may have a harmful effect on Company's reputation, its employees, clients, staff, etc. You are personally responsible for representations you make online and should understand that what is posted is trackable, traceable, and potentially permanent. To the extent you reference or discuss the Company, its business, services, clients, or employees, you are free to express yourself, but should do so in a manner in conformity with the guidelines below.

When using social media in your personal capacity, it is important to remember that you are speaking personally, and not as a Company representative, unless that is part of your job function. If you identify yourself as a Company employee in the course of using social media in your personal capacity, you **must** include a disclaimer that explains that the views you express are your own and do not necessarily reflect the views or opinions of Company.

In addition, employees utilizing social media for personal use shall not use Company's logo and/or trademarks for any commercial reason, including but not limited to promoting or endorsing any product, cause, or political candidate. Disclosure of Company information that is deemed time and content-sensitive, *e.g.*, marketing initiatives; pending legal matters; property negotiations; etc., may not be disseminated. When in doubt about whether information should be posted, stop and ask the Marketing Department.

If you do decide to use social media, the Company asks that you follow the below guidelines.

### **GUIDELINES**

The same principles and guidelines found in the Company's policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects clients, employees, business associates or affiliates or the Company's legitimate business interests may result in disciplinary action up to and including termination. As a reminder, any communications made through or on Company equipment is considered Company property and no expectation of privacy exists on any Company-owned system as the Company may review and monitor its systems at its discretion. In addition, postings or communications made on sites accessible to the Company or Company personnel are not private.

- **Know and Follow the Rules.** Use of social media is governed by existing Company policies. Carefully read these guidelines, the Company's Computer and Electronic Systems Usage Policy, and the Equal Employment Opportunity Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include

discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

- **Be Respectful.** Understand that you are more likely to resolve a work-related conflict by speaking directly with your supervisor or co-workers or by following the Company's complaint reporting mechanism; however, to the extent you decide to post complaints or criticism about or relating to your co-workers, supervisors, or the Company on a social media outlet, others here at the Company may find out about it. If your posts could be viewed as malicious, obscene, threatening, discriminatory, harassing, violent, intimidating or otherwise violate Company policy, it could have an adverse impact on your employment. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation, a post that discusses an employee's race or age in a joking or not so flattering manner, or a post that could be read as having sexual innuendo. These types of posts could create or contribute to a hostile work environment or campus on the basis of race, sex, disability, religion or any other status protected by law or Company policy. The Company also reminds you to treat our employees, clients, suppliers, vendors and others on social media as you would as if they were standing right in front of you. Meaning, if you would not say it to the person's face directly, it is probably not wise to say it on social media as it could harm the Company's relationship with that particular employee, client, supplier, vendor or other third party that is an integral part of the Company.
- **Be Honest and Accurate.** Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about the Company, co-workers, clients, suppliers, people working on behalf of the Company or competitors.
- **Post Appropriate Content.**
  - Maintain the confidentiality of Company trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, know-how, technology, methods, enrollment and recruitment information. What the Company defines as and considers trade secrets and private or confidential information is more fully set forth in the Company's confidentiality policy and may also be discussed further in any employment contract you may have. Do not post non-public financial information about the Company, marketing material, strategy, internal reports, policies, procedures or other internal business-related confidential communications.
  - Do not disclose Personally Identifiable Information ("PII") or Protected Health Information ("PHI") through social media communications. PII is confidential information and includes an individual's first name and last name or first initial and last name in combination with any of the following: their social security number, tax I.D. number, social insurance number, driver's license number, state issued identification card number, passport number, date of birth, financial information, banking information, credit or debit card information, PINS or passwords, answers to security questions, mother's maiden name, tax information, medical or health care information, biometric data, DNA profile, or medical/health information. "PHI" is confidential information and includes information that is created, received, and/or

maintained by the Company related to an individual's health care (or payment related to health care) that directly or indirectly identifies the individual.

- Do not post any information or conduct any online activity that violates applicable local, state, or federal laws or regulations.
- Respect copyright, trademark and fair use laws as well as financial disclosure rules and obligations. Do not use content from another source without proper attribution. However, simply giving the creator credit may not immunize you or the Company from a possible copyright infringement claim. When in doubt, ask.
- Express only your personal opinions. Unless it is part of your job function to speak for the Company via a Company-owned social media account, never represent yourself as a spokesperson for the Company. If the Company is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of the Company, co-workers, employees, suppliers, business associates, or people working on behalf of the Company. If you do publish a blog or post online related to the work you do or subjects associated with the Company, make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of the Company."
- **Using Social Media at Work.** Unless you are posting on behalf of the Company as part of your job function, refrain from using social media while on work time (which does not include during your break times or pre- or post-work time) or on equipment the Company provides, unless it is work-related as authorized by your manager. Do not use the Company email addresses to register on social networks, blogs or other online tools utilized for personal use.
- **No Expectation of Privacy.** All communications via our electronic systems are property of the Company and subject to inspection without notice. In addition, you have no expectation or privacy with respect to any information you post via social media.
- **Retaliation is Prohibited.** The Company prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.
- **Use Professional Judgment.** Finally, the nature of electronic communications is ever-changing. This Policy is intended as guidance on appropriate communications but cannot anticipate every situation or future changes in technology or methods of communications. While your free time is generally not subject to any restriction by the Company absent the above, you must use good professional judgment and common sense in your social media communications.

The information set forth in this document is intended as general risk management information. It is made available with the understanding that Beazley does not render legal services or advice. It should not be construed or relied upon as legal advice and is not intended as a substitute for consultation with counsel. Beazley has not examined and/ or had access to any particular circumstances, needs, contracts and/or operations of any party having access to this document. There may be specific issues under applicable law, or related to the particular circumstances of your contracts or operations, for which you may wish the assistance of counsel. Although reasonable care has been taken in preparing the information set forth in this document, Beazley accepts no responsibility for any errors it may contain or for any losses allegedly attributable to this information.

**SOCIAL MEDIA POLICY**

**ACKNOWLEDGMENT**

**Employee Name:** \_\_\_\_\_

**Employee Position:** \_\_\_\_\_

**Date of Receipt of Social Media Policy:**

I acknowledge and agree that:

- (1) I have received a copy of the Company Social Media Policy;
- (2) I have read the Social Media Policy in its entirety and fully understand the provisions contained therein; and
- (3) I agree to abide by the provisions contained in the Social Media Policy.

\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Employee's Name (Printed)

\_\_\_\_\_  
Date