Prepared by: Marketing and Communications

Effective Date: July 1, 2014 Revision Date: July 1, 2014

Title: Social Media Use Policy: 2.04

Policy: The term "social media" refers to the use of Web-based and mobile technologies to turn communication into an interactive dialogue. Philadelphia College of Osteopathic Medicine ("PCOM") realizes that social media sites including but not limited to Facebook, Blogger, YouTube, LinkedIn, Twitter, Pinterest and Issuu have become important and influential communication channels for our community. While it is solely your decision whether to engage in social media activities outside of work/campus time and on your own personal equipment, this policy is intended to provide helpful, practical advice to protect faculty, staff and students as well as PCOM.

All social media platforms are managed by the PCOM Department of Marketing and Communication.

Purpose: To establish policy and procedures governing the use of social media platforms in relationship to PCOM.

Scope: This social media policy (the "Policy") applies to the PCOM faculty and staff, as well as to our students, alumni and stakeholders, including the social media team (collectively, "user" or "you") participating in social media. The purpose of using these channels is to support PCOM's Mission and to disseminate college news, information, content and directives, and such use must be consistent with the procedures and guidelines contained in this Policy.

Procedures:

1. When using any social media channel, you should assume at all times that you are representing PCOM. Accordingly, the same principles and guidelines found in PCOM's Human Resources policies, the PCOM General Student Handbook, individual academic program handbooks, the Faculty Handbook or any applicable PCOM policy or agreement between you and PCOM apply to your activities online. Before creating online content, consider the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of your colleagues or otherwise adversely affects associates, classmates and PCOM's supporters/community or PCOM's legitimate business interests may result in disciplinary action up to and including termination.

Guidelines

- 2. You are expected to use your best judgment at all times while engaging in social media activities. The following guidelines apply to all social media activities by you at all times, whether or not on campus or using PCOM equipment. Nothing in these Guidelines is intended to prevent, interfere with or otherwise restrain an employee's rights under the National Labor Relations Act ("NLRA") or any other federal or state statute protecting employee workplace rights.
 - 2.1. Use of PCOM's Equipment. Except as specifically authorized, faculty and staff (fulltime and part-time), should limit or refrain from conducting blogging or social and professional networking activities using PCOM's equipment-including computers, handheld electronic devices, company-licensed software or other electronic equipment-or on PCOM's time (whether using PCOM's equipment or not). (See also Policy #2.03 Use of PCOM's Information Systems, PCOM-Owned Devices, and Personal Devices, and the "Acceptable Use Policy" which govern PCOM provided equipment).
 - 2.2. Social Media is inherently "Open." You have no reasonable expectation of privacy when you engage in social media activities using PCOM's equipment. Any posted material is subject to review in accordance with PCOM's faculty/staff and student policies and the use of social media in any context does not guarantee the privacy of any content. Information, including pictures or videos, that a user posts to social media sites, including your own sites, may be reviewed by PCOM. PCOM reserves the right to monitor comments or discussions about the College, its faculty, staff, employees, students, vendors, and the industry, posted on the Internet by anyone, including faculty, staff and students (whether part-time or fulltime). PCOM may use search tools and software to monitor social media activity such as blogs, social networking sites, postings, and other types of personal journals, diaries, and personal and business discussion forums. For reference, a "posting" may include any type of online communication, whether written, pictures, video or otherwise, whether posted by you or on your behalf. You are reminded that you do not have the right of privacy with respect to any messages or information created or maintained on PCOM's systems, regardless of whether that information has been deleted or erased.
 - 2.3. You are personally responsible for what you post. All users are personally responsible for the content they publish on social media. To help clarify that your comments are not on the behalf of PCOM (unless specifically authorized by PCOM), users should publish content in the first person. While users may mention in their personal profiles that they work for or attend PCOM, please do not use the PCOM name in any user name (such as "PCOMSusan"), whether or not in the workplace. If you are

not authorized to speak on behalf of PCOM (see 2.4, below) and PCOM is a subject of the content you are creating, be clear and open about your connection to PCOM and make it clear that your views do not represent those of PCOM, your colleagues, PCOM's faculty, associates, students, or PCOM's supporters/community. If you publish a blog or post online related to the work you do or subjects associated with PCOM, make it clear that you are not speaking on behalf of PCOM. If you publish content to any Web site outside of PCOM and it implicates your professional roles and responsibilities or subjects associated with PCOM, use a disclaimer such as: "The postings on this site are my own and do not necessarily represent PCOM's views, positions, strategies, or opinions.

- 2.4. Speaking on behalf of PCOM requires written approval from Marketing and Communications. To speak on behalf of PCOM, you must obtain the written approval of the College in advance. With approval, you should focus your contributions on topics related to your area of expertise and ensure that all statements are truthful. Your relationship with PCOM must be disclosed in a "clear and conspicuous" manner, such as "I am a PCOM faculty member." Even with PCOM's approval, you may be liable for your actions online.
- 2.5. Maintain confidentiality. You may not disclose any confidential or proprietary information of or about PCOM, its affiliates, faculty, staff or students, including but not limited to business and financial information, trade secrets such as the development of therapies, process, products, know-how and technology, represent that you are communicating the views of PCOM (unless specifically directed to do so by PCOM in writing), or do anything that might reasonably create the impression that you are communicating on behalf of or as a representative of PCOM without proper approval. If the information is not already public, you should not make it so. Do not post internal reports, policies, procedures, attorney-client privileged information or other internal business-related confidential communications; do not reveal personally identifiable information (e.g. social security numbers, addresses) regarding co-workers, students, vendors or other affiliates of PCOM. (See also Policy 2.01 Confidentiality).
- 2.6. When necessary, use disclaimers. If you publish content to any Web site outside of PCOM and it implicates your professional roles and responsibilities or subjects associated with PCOM, use a disclaimer such as: "The postings on this site are my own and do not necessarily represent PCOM's positions, strategies, or opinions."
- 2.7. Respect your audience. Do not use ethnic slurs, personal insults, threatening or inflammatory communications, obscenities, or engage in any conduct that would not be acceptable in PCOM's workplace as set forth in PCOM's Human Resources policies, the

PCOM General Student Handbook, individual academic program handbooks, the Faculty Handbook or any applicable agreement between you and PCOM. Always be fair and courteous to your colleagues, PCOM's faculty, associates, students and PCOM's supporters/community. If you decide to post complaints or criticism, avoid using statement, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparages PCOM's faculty, associates, students, or PCOM's supporters/community, or that might constitute harassment or bullying. Examples of such conduct may include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or PCOM's policies. If you should make an error online, be open and up front about the mistake and correct it. For example, in a blog setting, if you correct an earlier post, make it clear to readers that you have done so. (See also the "Acceptable Use Policy")

2.8. Obey the law. Do not post any information or participate in any social media activity that may violate applicable local, state, or federal laws or regulations. Users are prohibited from using any copyrights, trademarks or logos of PCOM, for commercial use without prior written approval of management.

Conclusion

- 3. PCOM will investigate and respond to all reports of violations of PCOM's Social Media Policy and other related policies. Users should send any concerning links or posts to the Office of Marketing & Communications [communications@pcom.edu] and the proper PCOM faculty or staff member will address any issues and post responses as appropriate. PCOM prohibits taking negative action against any employee or student for reporting a possible deviation from these Guidelines or for cooperating in an investigation. Any employee who retaliates against another for reporting a possible deviation from these Guidelines will be subject to discipline, up to and including termination
- 3.1 PCOM reserves the right to impose discipline, up to and including termination, where necessary against employees who engage in prohibited or unlawful conduct. If you have any questions about this policy or a specific posting online, please contact the Office of Marketing and Communications at 215-871-6300.