

Social Media Policy

Purpose

This document establishes the corporate policy and standards for social media use at LandStar Title Agency, Inc. and provides guidance for professional and personal use of social media.

Social Media

Social media is a form of interactive electronic communication used to create and share content through text, images, audio, and/or video and enable people to socially interact online. Social media consists of web-based and mobile technologies that facilitate interaction, information-sharing, and relationship-building among users.

Social Media may include, but is not limited to

- Social networking sites (such as Facebook, Myspace, LinkedIn, Bebo, Yammer)
- Video and photo sharing websites (such as Flickr, YouTube)
- Blogs, including corporate blogs and personal blogs
- Blogs hosted by media outlets
- Microblogging services (such as Twitter)
- Wikis and online collaborations (such as Wikipedia)
- Forums, discussion boards and groups (such as Google Groups)
- Podcasting
- Online multiplayer gaming platforms (such as World of Warcraft, Second Life)
- Instant messaging (including SMS)
- Geo-spatial tagging (Foursquare)

Policy

All LandStar Title Agency, Inc. employees and contractors are responsible for following the standards defined in this document when using social media for personal or professional use.

Reporting Inappropriate Use

Employees or contractors who notice inappropriate or unlawful content online relating to LandStar Title Agency, Inc., or content that may have been published in breach of this policy, should immediately report the circumstances to Kenneth Warner by phone at 516-336-2020 or e-mail at kwarner@landstartitle.net

Professional Use of Social Media

Before engaging in social media as a representative of LandStar Title Agency, Inc., employees or contractors must be authorized to comment. To become authorized to comment in an official capacity, employees and contractors must have been through a trial usage period, obtained approval from their manager and/or from John Burke.

Once authorized to comment as a company representative, employees or contractors *must*

- Disclose they are an employee or contractor of the company, and use only their own identity, or an approved official account or avatar
- Disclose and comment only on information classified as public domain information
- Ensure that all content published is accurate and not misleading and complies with all relevant departmental policies

- Ensure they are not the first to make an announcement unless specifically given permission to do so
- Comment only on their area of expertise and authority
- Ensure comments are respectful of the community in which they are interacting online
- Adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, trademark, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws

Those authorized to comment as company representatives, *must not*

- Post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright or trademark, constitutes a contempt of court, breaches a Court suppression order, or is otherwise unlawful
- Use or disclose any confidential or secure information including, but not limited to
 - Personal or transactional information about consumers (buyers, sellers, borrowers)
 - Personal, transactional or contractual information about customers (lenders, real estate agents)
 - Non-public information (NPI) of any kind (loan numbers, social security, etc. – see NPI policy)
- Make any comment or post any material that might otherwise cause reputational damage or cause disrepute to LandStar Title Agency, Inc., its customers (lenders, Realtors) or their employees and agents, or consumers (buyers, sellers, borrowers)

Moderation of Company-Produced Social Media

The site owner must ensure the moderation policy is clear when inviting comments from the public on a company website or social media platform.

All company website activity including any social media must be approved by the John Burke.

Personal Use of Social Media

LandStar Title Agency, Inc. recognizes that employees and contractors may wish to use social media in their personal lives. This policy does not intend to discourage or unduly limit their personal expression or online activities.

Employees and contractors should

- Recognize the potential for damage that could be caused directly or indirectly to LandStar Title Agency, Inc. in certain circumstances from personal use of social media by those that can be identified as a company employees or contractors
- Comply with this policy to ensure that the risk of such damage is minimized

Employees and contractors are personally responsible for the content they publish in a personal capacity on any form of social media platform. When in doubt, they should seek guidance from the LandStar Title Agency, Inc. on how to comply with these obligations:

Where comments or profiles can identify someone as a company employee or contractor, company employee and contractors *must*

- Only disclose and discuss publicly available information
- Ensure that all content published is accurate and not misleading and complies with all relevant departmental policies
- Expressly state on all postings identifying them as a company employee the stated views are their own and are not those of the company
- Be polite and respectful to all people interacted with
- Adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment, and other applicable laws

Where comments or profiles can identify someone as a company employee or contractor, company employee and contractors *must not*

- Post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright or trademark, constitutes a contempt of court, breaches a court suppression order, or is otherwise unlawful
- Imply they are authorized to speak as a representative of the company or give the impression that the views they express are those of the company
- Use their company e-mail address or any company logos or insignia
- Use their company email address or any company logos or insignia that may give the impression of official support or endorsement of their personal comments
- Use the identity or likeness of another employee, contractor or other member of the company
- Use or disclose any confidential information obtained in their capacity as an employee or contractor of the company
- Imply they are authorized to speak on behalf of the company, or give the impression that any views they express are those of the company
- Use or disclose any confidential information or personal information obtained in their capacity as an employee or contractor of the company
- Post material that is, or might be construed as, threatening, harassing, bullying, or discriminatory towards another employee or contractor of the company
- Make any comment or post any material that might otherwise cause damage to the company's reputation or bring it into disrepute

Reasonable and Unreasonable Personal Use

When accessing social media using the LandStar Title Agency, Inc. Internet, intranet, or extranet systems, employees and contractors must use these resources in a reasonable manner that does not interfere with their work, that is appropriate, and that does not constitute excessive access.

Examples of *reasonable use* include

- Participating in working groups on the company's intranet
- Updating Facebook status and posting messages during a lunch break

Examples of *unreasonable use* include

- Company resources should not be used to access or post any material that is fraudulent, harassing, threatening, bullying, embarrassing, sexually explicit, profane, obscene, racist, sexist, intimidating, defamatory, or otherwise inappropriate or unlawful.
- It is not acceptable to spend hours using social media that is not related to work, during work hours.

Copyright

Employees and contractors should respect copyright laws and fair use of copyrighted material and attribute work to the original author/source wherever possible.

Harassment and bullying

Workplace bullying and harassment includes any bullying or harassing comments employees make online, even on their own private social networks or outside of work.

Abusive, harassing, threatening, or defaming postings are in breach of LandStar Employee Policy, and may result in disciplinary action being taken.

All employees are expected to treat their colleagues with respect and dignity and must ensure their behavior does not constitute bullying and/or harassment.

Defamation

Employees and contractors should refrain from publishing material that may cause injury to another person, organization, association, or company's reputation, and should seek further guidance if publication of such material is thought to be necessary.

Offensive or Obscene Material

Material may be offensive or obscene and may infringe relevant online classification laws if it is pornographic, sexually suggestive, harassing, hateful, racist, sexist, abusive, or discriminatory. Employees and contractors should refrain from accessing offensive or obscene material.

Contempt of Court

Employees and contractors should obtain approval before referring to pending court proceedings to avoid publishing material that may have a tendency to prejudice those proceedings, in particular, material that will be part of the evidence in those proceedings.

Employees and contractors should make enquiries about any applicable court suppression orders before commenting on any court proceeding (past, pending, or current).

Violation of Policy

Failure to adhere to all requirements stipulated in this policy and all related documents may result in disciplinary actions, up to and including

- Immediate removal of any applicable hardware/software/access to the LandStar Title Agency, Inc. computer network or business systems
- Formally reporting the incident to LandStar Title Agency, Inc. senior management
- Termination of employment
- Any other action deemed necessary by LandStar Title Agency, Inc. senior management

Depending on the circumstances, non-compliance with this policy may constitute a breach of employment or contractual obligations, misconduct, sexual harassment, discrimination, or some other infringement of the law.

Review

LandStar Title Agency, Inc. has voluntarily adopted this policy for its sole and exclusive use. This policy and all related documents will be reviewed annually or as needed based on prevailing business conditions.

Approved

Kenneth Warner, Esq., Vice President and Senior Counsel
Revision History

Version Number	Revised Date	Effective Date	Approved By	Brief Change Summary