

Sonata Finance Private Limited

Social Media Policy

Ver 1.0

Classification: *Internal use*

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## Version History

Sl No	Description of change	Version number	Date
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**Table of Contents**

**Version History..... 2**  
**Introduction: ..... 4**  
**Purpose: ..... 4**  
**Social media policy..... 5**  
    **Policy statements..... 5**  
    **Implementation..... 8**

## Introduction:

This policy provides guidance for company personnel on the use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a broadcast manner.

Some examples include the following

1. Social networking – e.g. Facebook, MySpace , Google +
2. Video and photo sharing – e.g. Flickr, YouTube
3. Blogs – e.g. corporate blogs, personal blogs or media blogs
4. Micro blogs – e.g. Twitter
5. Forums and discussion boards – e.g. Yahoo! Groups , Quora ,
6. Online encyclopedias – e.g. Wikipedia, wiki.
7. Social bookmarking- e.g. Pinterest,

At all times employees and other parties using social media shall keep in mind the impact of such usage on the brand and reputation of the company. All employees posting on social media either as part of the official company accounts or as part of personal posting must remember that information remains forever on the internet and the internet never forgets and hence use caution and common sense at all times.

## Purpose:

This document aims to define the policy framework to enable the safe and productive use of various social media platforms available to the organization with an understanding of the risks and impact from improper use.

## Social media policy

This policy document details the actions to be take under the following heads

1. Account creation/set-up
2. Content posting/update
3. Employee usage of social media
4. Incident handling.

### Policy statements

#### Account creation/set-up

1. Social media accounts/handles (user names) shall be created and managed using clearly identified accounts belonging to the company.
2. All company social media accounts/handles shall follow the naming convention such as dept.-company name or employee\_company name so that identification of official social media accounts/handles is possible.
3. Official email ids shall be used for all social media log-in.
4. Passwords used in all social media log-in shall follow company password policy if such policy exists or include at least one special character, alphabets and numerals and shall be changed as per company policy or the policy enforced by the service provider.
5. Company profile on social media such as Twitter, Facebook, LinkedIn or any other such means shall clearly identify the content as belonging to the company and will use details that are version controlled and periodically reviewed and updated.
6. All images /screen profiles used on company social media shall belong to the company. Images/ other details for which the company does not own the copyright shall not be used. When posting content, which is from some other source, the post will always credit the source.
7. Any new social media account that has to be created shall be reviewed for risks and approved by relevant authorities including internal audit and the compliance team.
8. In case access to company/official social media account is being done from mobile devices, it shall be ensured that connections are secure (where possible public wifi should be avoided, passwords are not stored on the device).

#### Content posting/update

1. Content shall be reviewed and approved by the relevant authority before posting on any company social media account.
2. At all times customer information especially any information which may be considered private shall not be posted on social media pages. Information which are to be considered private and which shall not be posted include (but are not limited to), customer names, contact numbers, photographs,

- location details (such as Latitude-Longitude, GPS information, address), credit status, bank account information, payment status, credit status etc. For more information refer to the organization's information security policies
3. Content shall be posted in keeping with a periodic update policy/process.
  4. Responses to queries/inputs/comments on the social media pages shall be provided as per pre-defined internal process.
  5. It shall also be ensured that response to queries on social media are given as promptly as possible and as directly to the person posting the query be it a customer or enquiries about job openings in the company. Under no circumstance, shall information about a specific customer be posted directly on social media.
  6. Responses to queries about specific customer or customer related information shall be provided directly to such customer after verification of details to positively confirm the identity of the customer and the need to provide the information queried for. After verification of customer identity and need for the information, responses shall be provided directly to the customer over phone or email or mobile as the case may be. The media used for providing such information also needs to be confirmed before transmission of information. Under no circumstance will such information be posted directly on social media.
  7. It shall be ensured that responses at any time do not cause any offense or give rise to controversies and adhere to the statutory and regulatory requirements.
  8. At any time, a public response to a specific query/comment shall not be posted unless such response will help resolve or prevent from other sources. Responses will always be communicated specifically to the user/customer who has specifically posted the query/comment.
  9. Common updates/status updates/responses will only be provided where such a response is demanded or deemed necessary by the organization.
  10. Where necessary it shall be ensured that pre-approved messages are made available to employees, top management, third parties etc. who can post these on social media in support of the company.
  11. Under all circumstance any information marked as "internal use" or "confidential" shall not be posted on any social media sites/via any social media handles whether official or personal.
  12. All posting on social media handles/accounts must respect copyright. Always credit the source for any post where information from somewhere else or some one else is being posted by the company handle/social media account.

### **Employee usage of social media**

1. Employees of the company are allowed to use social media as long as they do not make any postings/updates or other such actions, which makes it look like their postings are made on behalf of the company.
2. Employees shall be encouraged NOT to link or tag or in any other way link company social media accounts to their personal postings.

3. Employees shall not divulge any information pertaining to the company or its customers on their personal social media pages.
4. Employees shall not post/update/link any information they come across in their day-to-day work on to the social media irrespective of the circumstances.
5. Employees shall always respect the privacy of colleagues /customers when posting information on their personal social media pages.
6. Employees must not post company information unless such information has already been posted by official accounts/spokes persons on company social media handles/accounts.
7. Employees who post both personally and also company related information are encouraged to use disclaimers such as the following in their profiles; e.g. "The postings on this site are my own and do not necessarily represent the position, strategy or opinions of the company".
8. Employees are encouraged NOT to talk about revenues, future products, pricing decisions, unannounced financial results, strategy or similar matters. It is good to stay away from discussing financial topics and prediction of future performance at all costs.
9. Employees are prohibited from posting on social media commentary, content, or images that are defamatory, pornographic, obscene, threatening, discriminatory, proprietary, harassing, libelous, or hateful.
10. Employees are not allowed to use company information processing facilities for posting on social media such as Facebook, Twitter, LinkedIN for personal purposes.
11. Employees should not spread rumors or otherwise inappropriate content online.
12. Employees should not use trademarks or any official marketing material on any personal communication or reproduce any company material.
13. The organization is not liable for any violation of statutory and regulatory requirements made by its employees.

### **Incident handling**

1. In case of any incidents whereby social media posting by the company or response raise hackles, steps shall be taken to suitably placate the public and those offended by posting suitable apology messages.
2. Under any circumstance, no attempt will be made to rebut or respond via counter message on social media.
3. In case social media postings by the company (from its official account/handle) or due to posting by employees / third parties or others causes issues, such matters must be reported to the relevant department or person as the case may be and handled according to the conditions stated in the contract / disciplinary action policy / NDA.

### Implementation

1. This Board approved Social Media Policy shall be implemented within SFPL by relevant teams and departments.
2. Compliance to this policy and implementation status shall be evaluated at least annually in keeping with assurance requirements indicated above and reported to the Board.
3. Responsibilities may be specifically allocated and detailed procedures may be developed where necessary to further support effective implementation of this policy.