Electronic Social Media Policy
Adopted as of March 15, 2013

I. Scope of Policy
This Electronic Social Media Policy (“Policy”) applies to (i) all College faculty, administration, staff members and other persons authorized to use College-provided or supported technology resources (collectively, “Users”), including, but not limited to desktop and laptop computers, tablets, mobile devices, cell phones, personal digital assistants, servers, networks, printers, software, data storage media, e-mail, voice mail, fax machines, photocopiers, Internet and intranet access (collectively, “College Technology Resources”); (ii) all information created, entered, received, stored, accessed, viewed or transmitted by the use of College Technology Resources while using or participating in Social Media (as that term is defined below) activity; and (iii) all accounts for the use of or participation in Social Media created for official business purposes of the College in conjunction with representing the College or in conducting official work for the College (collectively, “Official Social Media Accounts”). Additionally, to the full extent permitted by applicable law, this Policy applies to certain types of activity specifically prohibited by the Policy while using or participating in Social Media activities even if such activity involves use of non-College Technology Resources (“Personal Technology Resources”), whether during work or personal time.

This Policy may evolve as new technologies and Social Media tools emerge. Please check this Policy periodically to ensure familiarity with its content.

II. Definition of Social Media
For the purposes of this Policy, “Social Media” includes Internet-based, software-based and other electronic communications and online platforms that allow content to be generated by users, sent, posted and/or otherwise shared. Such activity may include use or participation in blogs, vlogs or microblogs (such as Twitter); personal websites or webpages; online forums or communities; message boards; wikis (such as Wikipedia); listservs or mailing lists; social or professional networking sites (such as Facebook, Google+ or LinkedIn); audio, photo or video-sharing websites or networks (such as YouTube, Flickr, Picasa or Pinterest); internal intranets or networks; text-messaging or instant-messaging; and participation in virtual environments (such as Second Life). This Policy applies to Social Media that is currently available or emerging as well as all other online platforms or media with user-generated content that may become available after the adoption of this Policy by the College.

III. Compliance with Other College Policies
This Policy is intended to supplement, not replace, other policies of the College, which remain in full force and effect and apply to the use of or participation in Social Media. Adherence to the other applicable policies of the College when using Social Media is required. In particular, the following policies found in the Babson College Employee Handbook and/or at www.babson.edu must be kept in mind when using Social Media:

- Computer Acceptable Use Policy
- Trademarks Service Marks and Copyrights – College Branding and Marketing Policies
Social Media must never be used in a way that violates any other of the College’s policies.

IV. Compliance with the College’s Harassment-Free Workplace Policy
Consistent with the provisions of Section III above, the use of College Technology Resources to engage in conduct that violates or could be construed to violate the College’s harassment-free workplace policy is prohibited. Users specifically may not use College Technology Resources to generate sexually explicit or offensive images, messages, cartoons, jokes, ethnic or religious slurs, racial epithets or any other material that could constitute harassment or disparagement on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, gender or any other status protected by law. Users are required to take all reasonable steps to avoid and eliminate receipt of potentially offensive material, including blocking or unsubscribing from known sources of such material. Further, Users may not create postings or comments that involve threats of violence or include sexual, racial or otherwise discriminatory content that is harmful to the College’s working environment.

V. Compliance with Applicable Laws When Using College Technology Resources
All applicable local, state, federal and international civil and criminal laws must be observed with regard to any Social Media activity conducted using College Technology Resources. College Technology Resources may not be used in violation of any such laws.

VI. Limits on Personal Social Media Activity When Using College Technology Resources
College Technology Resources are to be used only for legitimate business-related communications, except for occasional non-work related use, as described in the Babson College Employee Handbook. Excessive non-work related use of College Technology Resources, including excessive non-work related use of such resources to participate in Social Media activities, may result in disciplinary action, up to and including termination.

VII. No Expectation of Privacy
Users should have no expectation of privacy with regard to any Social Media activity conducted using College Technology Resources and are strongly encouraged to obtain personal accounts for any non-work related Social Media activity, and to avoid using babson.edu e-mail accounts for such activity.

The College reserves the right (but has no obligation) to monitor, intercept and review, without further notice, any and all activities involving the use of the College Technology Resources, including without limitation Social Media activities involving the use of such resources. Users
should not use the College Technology Resources for any matter that Users desire to be kept private or confidential from the College.

In addition, many Social Media activities are uniquely public and may be accessible by anyone, even if they are conducted using Personal Technology Resources. Because of the high likelihood that Social Media activity will be viewed by co-workers, alumni/ae and others (who may, for example, join a User's social network or visit a User's blog), all Users must act responsibly and exercise care to ensure that their activities are consistent with the College’s policies.

VIII. Review of Content Posted to Social Media
While the College is not obligated to monitor or review content posted to Social Media sites using College Technology Resources, the College shall have the right to do so.

With respect to any Social Media sites maintained and/or activities conducted in the name of the College, including without limitation any and all sites and activities associated with Official Social Media Accounts, whether or not such site or activity involves use of College Technology Resources, the College shall have the right to remove or cause the removal of any content (or portions thereof) for any reason, including without limitation content that the College, in its sole discretion, deems false, misleading, obscene, defamatory, libelous, tortious, degrading, threatening, harassing, hateful, insulting, inflammatory, offensive, unlawful, fraudulent, discriminatory, invasive of the privacy or publicity rights of others, in violation of intellectual property or other proprietary rights, injurious, unlawful, illegal or otherwise in violation of this Policy.

IX. Requirements for Official Institutional Representation via Social Media/Approval Process and Requirements
No official institutional representation via Social Media is permitted unless such representation is authorized by the Chief Marketing Officer. Specifically, the establishment of any Official Social Media Account must be approved, in writing, in advance by the Chief Marketing Officer to ensure consistency and compliance with the College’s Brand Style Guidelines, Computer Code of Ethics and other applicable policies of the College.

When requesting approval for the establishment of Official Social Media Accounts, all applicants shall submit the following information to the Chief Marketing Officer: the account name, the desired platform, the account purpose and goals (e.g., promotion of a specific program or department, communicating with students or alumni), a general description of content intended to be shared, and the designated College administrator of said account (i.e., the primary person responsible for maintaining and monitoring the site(s) to be associated with the Official Social Media Account to ensure compliance with this Policy) and his or her contact information.

All Official Social Media Accounts will be publicly listed by the College in a directory on the babson.edu website. The sites associated with these accounts and the related College administrator contact information should be verified annually and the information provided to the Chief Marketing Officer by September 15th of each year.

Official Social Media Accounts shall conform, at all times, to the College’s Social Media Best Practices.
College Marketing shall maintain a list of Official Social Media Accounts and shall have the
authority to revoke authorization for use of an Official Social Media Account at any time and
for any reason.

X. **Required Disclaimer and Disclosures/Endorsements**

Users must not create an impression that they are speaking on the College’s behalf or in any
way suggest that they are representing the College’s official position, unless they are
authorized to do so.

Other than when Users are speaking on behalf of the College with appropriate authorization,
if a User identifies himself or herself as a College faculty member, administrator, staff
member or as someone otherwise associated with the College, or comment on a College-
related issue while posting, **TO THE EXTENT IT IS PRACTICABLE TO DO SO**, the
User must include a prominent disclaimer stating that the views being expressed are his or
her own and not necessarily the College’s views:

The views and opinions expressed by [name] in this [blog/post/etc.] are [my/his/her]
own, and do not necessarily represent the views and opinions of Babson College.

Users should take special care when posting and be thoughtful about how they present
themselves in connection with the College; personal postings may be interpreted as the views
and opinions of, and will reflect on, the College even with the disclaimer language in place.

When they have prior authorization to do so, if a User is contacted by a member of the media
to comment upon the College or any College affairs, the User should refer that person to the
College’s Office of Public Relations.

If someone offers to pay a User for participating in Social Media in or in connection with
User’s role within the College or offers to pay User for or in connection with advertising or
endorsements, the User should contact the College's Chief Marketing Officer prior to taking
any action. Engaging in advertising or any form of commercial solicitation in connection with
User’s role within the College is prohibited, except where the prior written approval of the
Chief Marketing Officer has been obtained.

XI. **Best Practice Guidelines for Social Media Use and Participation**

The following Best Practice Guidelines apply while participating in a Social Media activity,
whether or not such activity involves use of College Technology Resources or Personal
Technology Resources and/or takes place during work or personal time:

- Be careful about what you post. Each User is personally responsible for what he or she
  posts. Remember that anything you post may be public for a long time, even if you try
to modify or remove it later.

- Keep personal Social Media activity distinct from professional Social Media activity,
  and conduct communications on purely personal Social Media from personal e-mail
  accounts only.

- Be responsible and thoughtful, and when uncertain or concerned about the
  appropriateness of any statement or posting, refrain from making the communication.
• Be respectful, professional and accurate in your communications, and abide by all applicable laws.

• Refrain from using the logos, brand names, taglines, slogans or other trademarks/service marks, or post any confidential or proprietary information of third parties without their prior written permission.

• Avoid misappropriating or infringing the intellectual property rights of others, including copyrights.
  
  - Always make a determination whether permission is needed for third party materials - such as photographs, articles or music - to be posted or uploaded.
  - Attribute what you post; let others know where you get your materials and information, being particularly respectful of and compliant with copyright, trademark/service mark and other intellectual property and proprietary rights. Keep in mind that attribution is not always sufficient. Indeed, in general, it is necessary to get permission prior to using third party materials.
  - Be careful about “reposting” information from other sites.

• Maintain the security of your own passwords, including those used to access or use a Social Media site (or features contained on such site).

• Review and comply with the legal terms and conditions, codes of conduct or other requirements, procedures or policies of or governing the Social Media site being accessed or used.

• Review the privacy policy of each Social Media site accessed or used to understand how the site uses the information that its users provide. Be careful about revealing excessive personal information, including your birth date, contact information and personal photographs. Social Media sites’ users who do not want their personal information to be publicly available should not post it online.

XII. Prohibited Social Media Activity
To the full extent permitted by law, the following conduct is specifically prohibited, and constitutes a violation of this Policy, while participating in a Social Media activity, whether or not such activity involves use of College Technology Resources or Personal Technology Resources and/or takes place during work or personal time:

• Posting content that reveals the College’s trade secrets and other confidential/proprietary information, or otherwise commenting on said information. The College’s trade secrets and other confidential/proprietary information must be treated accordingly and may not be jeopardized through the use of Social Media.

• Use of the College’s logos, brand names, taglines, slogans or other trademarks/service marks of the College, except where prior written permission from the College’s Chief Marketing Officer has been obtained. If permission is obtained, all such uses shall comply with the College’s Intellectual Property, Branding and Marketing Policies; failure to so comply shall constitute a violation of this Policy.

Updated: March 9, 2016
• Posting content that reveals Personal Information, as that term is defined in the Babson College Personal Information Security Plan and which shall include an individual's name, work or home address, e-mail address, telephone or facsimile number, Social Security number (SSN) or other government identification number, employment information and background information, financial information, medical or health information, such as an individual's health insurance identification number or condition, account numbers, device identifiers and serial numbers, and biometric identifiers (including finger and voice prints).

• Posting personal information about other individuals that may have been obtained through working at or in connection with your association with the College.

• Posting content in violation of applicable laws, including without limitation posting content that includes educational records in violation of the Federal Education Records Protection Act (FERPA).

• Posting content that is false, misleading, obscene, defamatory, libelous, tortious, threatening, harassing, abusive, hateful, racially or ethnically disparaging, inflammatory, offensive, fraudulent, discriminatory, invasive of the privacy or publicity rights of others, or otherwise injurious, unlawful or illegal.

• Posting content that discusses illegal activities with the intent to commit them.

• Posting content in violation of another’s intellectual property or other proprietary rights, including without limitation content that infringes on any patent, trademark, copyright or trade secret rights.

• Impersonating any person or entity or falsely stating or otherwise misrepresenting affiliation with a person or entity.

XIII. Revisions
The College may amend, revise or depart from this Policy at any time, with or without notice. This Policy does not constitute, and shall not be construed as an express or implied contract of employment. Because technology is constantly changing and evolving, this Policy should be periodically reviewed in order to become familiar with its terms and with any subsequent updates.

XIV. Construction
This Policy should not be construed to interfere with any rights protected under federal, state or local law, including employees' rights to discuss or engage in Social Media activities relating to their terms and conditions of employment, or other such rights protected by the National Labor Relations Act (NLRA). Any ambiguity found in this Policy shall be construed in favor of a lawful meaning. Specifically, nothing contained in this Policy or its enforcement is intended to interfere with the College’s employees’ rights under the NLRA — i.e., protected activities under the NLRA are neither prohibited nor discouraged. Any conflict between this Policy and the current state of the law will be decided in favor of the law.
XV. Policy Violations
Access to and use of College Technology Resources is a privilege, not a right. Users who do not comply with this Policy are (i) subject to denial of access to College Technology Resources and (ii) may be subject to disciplinary action up to and including termination of employment or cessation of any contractual relationship with the College, consistent with the then current state of the law. The College reserves the right to hold the user personally liable for any violations of this Policy.