

FLANAGAN STATE BANK

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FSB Social Media Acceptable Use Policy

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SOCIAL MEDIA ACCEPTABLE USE POLICY

Definition of Social Media - For the purposes of this policy, social media should be understood to include any website or forum that allows for open communication on the internet, including, but not limited to:

- Social and professional networking sites (e.g., LinkedIn, Facebook, Instagram, Tumblr);
- Micro-blogging sites (e.g., Twitter);
- Blogs (including company and any personal blogs) and other online journals and diaries;
- Bulletin boards and chat rooms;
- Online encyclopedias (e.g., Wikipedia);
- Video and photo-sharing websites (e.g., YouTube, Pinterest, Flickr); and
- Employee review sites (Glassdoor, vault).

Social media activity not only includes adding posts/content, but also includes permitting or failing to remove posts/content by others when the employee has control over the forum, such as a personal page or blog.

When you are participating in social networking, you are representing both yourselves personally and Flanagan State Bank. It is not our intention to restrict your ability to have an online presence and to mandate what you can and cannot say. We believe social networking is a very valuable tool and continue to advocate the responsible involvement of all Flanagan State Bank employees in this space. While we encourage this online collaboration, we would like to provide you with a company policy and set of guidelines for appropriate online conduct and to avoid the misuse of this communication medium.

Application – This policy applies to all employees and to social media activity that relates to Flanagan State Bank’s business, employees, customers, vendors or competitors or that identifies an employee’s affiliation with Flanagan State Bank (other than as an incidental mention of place of employment in personal social media activity unrelated to Flanagan State Bank).

Scope – This policy applies to social media activity when on or off duty, while using Flanagan State Bank’s or personal electronic resources, and whether or not the employee posts anonymously or using a pseudonym.

Use at Work or on Employer Equipment – Employees should limit their use of social media during work hours or on equipment provided by Flanagan State Bank unless such use is work-related or authorized by a supervisor or other authorized personnel of Flanagan State Bank. Employees should not use company-provide email addresses to register or social networks, blogs or other websites for personal use. Employees should note that this provision is not meant to prohibit employees from engaging in protected concerted activity under Section 7 of the National Labor Relations Act (NLRA).

Requesting a Flanagan State Bank Business Social Media Account – If a mortgage group, loan officers, branch or other Bank employee would like to have a social media page related to Flanagan State Bank (or any DBA) business, they should request this from the Director of Marketing. No Bank business-related social media page may be created for any mortgage group, loan officer, branch or other Bank employee without the prior approval of the marketing and compliance departments. For mortgage loan officers, these pages must include the loan officer's NMLS number, the Bank's name (as well as the name of any DBA), the Bank's NMLS number, and the Equal Housing Lender logo.

Transferring Pre-existing Social Media Accounts - Any existing business profile created by a division, office, or loan officer of the Bank prior to beginning its employment relationship with Flanagan State Bank must register the profile or page with the Director of Marketing immediately upon employment. The Director of Marketing and compliance department will review the profile or page for compliance with applicable regulations and consistency with the Bank's general standards of appearance and professionalism. The Director of Marketing will convey any changes that must be made to the profile or page in order for it to remain active. Changes must be completed within 30 days of notification, or the profile or page must be deleted.

Posting to Business-Related Social Media Pages - All posts made to mortgage group, loan officer, branch or other Bank business pages must be submitted through the Gremlin software and approved by marketing and compliance departments prior to posting, regardless of whether there is a cost involved or not. Posts that are not able to be processed through Gremlin should be sent to compliance and marketing for approval prior to posting. Employees may share approved Flanagan State Bank posts from other social media pages to their page. Loan officers or others may wish to prepare of schedule of posts to the Director of Marketing to be approved all at once in advance for a certain period of time.

Ownership of Business-Related Social Media Accounts –Flanagan State Bank's own banking Facebook page and any other business social media pages will be maintained by the Director of Marketing and remain the property of Flanagan State Bank at all times. See the Ownership of Social Media Accounts and Work Product section for further information.

Posting Business-Related Content to Personal Accounts – If desired, Flanagan State Bank employees may "share" approved posts from Flanagan State Bank's (and DBAs) own social media pages to their personal pages either with pre-approved and provided wording or without any additional business or product advertising content/wording added by the employee. However, employees may not create their own posts advertising Flanagan State Bank products or services for their personal pages. Other than "sharing" posts from Flanagan State Bank's own social media pages as described above, we ask that loan officers or any other employees not use their own personal social networking sites to advertise Flanagan State Bank's products or services, as this opens both the individual and the Bank up to unnecessary liability.

Professionalism – Posts to business-related social media pages should be consistent with Flanagan State Bank's general standards of appearance and professionalism. Posts/content that undermine

the professionalism of the Bank, its employees or the industry will not be approved. Posts/content that insults or promotes a negative image of other companies, competitors, consumers, customers or employees will not be approved.

Application of Other Policies – Flanagan State Bank’s policies regarding discrimination, harassment, retaliation and protection of Flanagan State Bank’s confidential information apply to social media use.

Personal Opinions – Employees should express only personal opinions online and should never represent themselves as a spokesperson for Flanagan State Bank unless given explicit permission to do so. An employee who chooses to post online content relating to Flanagan State Bank should make it clear that he or she is not speaking on behalf of Flanagan State Bank, such as with a statement like *“The opinions expressed on this site are my own and do not necessarily represent the views of Flanagan State Bank”*.

Content posted to a business-related social page should not contain any personal opinions on controversial or political topics unrelated to the banking or mortgage industry. Employees should also refrain from using business-related social media pages to advertise, recommend, or solicit funds or donations for businesses, business partners, or unapproved causes.

Confidential Information – Employees should not post any financial, confidential, sensitive or proprietary information about Flanagan State Bank or our customers.

Intellectual Property Laws – Employees should respect and comply with all copyright, patent, trademark and intellectual property laws and to avoid violating the intellectual property rights of the company or others. Employees are prohibited from using any of Flanagan State Bank’s logos for any business/commercial ventures without Flanagan State Bank approval. Flanagan State Bank will only use photographs and other materials such as graphics, clip art, memes, etc. that it has the legal rights to use. Legal rights means that the Bank has paid for it, created it, or is allowed to use the file under Creative Commons or other similar licenses. Discretion needs to be used in identifying the true copyright status of a file, as there are many fraudulent sites online that advertise files for use that are actually stolen from copyright owners. Even if a site claims that their files are free for use or the image is found in Google Images as free, the Bank could still be held responsible if we use someone else’s copyrighted work without the owner’s permission. To help reduce this risk, please refrain from using Google Images, meme generating sites, or unverified sites that claim to offer free files, and instead contact Marketing for a list of approved options.

Photograph Use Consent – Before using any photographs in an advertisement to promote a product or service you must obtain the consent of any person(s) identifiable in the photograph. For minors, you must first obtain the consent of a parent or legal guardian. Contact Marketing if you need a copy of a photograph consent form.

Demonstrate Respect – Employees should not post content that: (a) is threatening, abusive, offensive or knowingly false; (b) disparages the employer’s products or services; or (c) depicts the employee engaging in conduct that violates company policy or that is unlawful. Such prohibitions do not apply to employees’ Section 7 rights.

Personal Information – Employees should safeguard sensitive personal information and avoid posting their own or others’ personal information that may be used to commit identity theft, such as credit card numbers, driver’s license numbers and Social Security Numbers. Employees should not request confidential information from customers via social media sites.

Privacy Settings – Employees should use privacy settings to restrict access by others to overly personal content posted on social media websites.

Media Inquiries – Any media inquiry for comment on the behalf of Flanagan State Bank (including any DBA) must be directed to the Director of Marketing.

Internal Contact – Any concerns about social media content posted by others related to Flanagan State Bank or any of its DBA’s must be directed to the Director of Marketing. Employees should not try to have the post removed or send a written reply that will escalate the situation.

Work-Related Concerns – For the most efficient resolution, employees are asked to directly address any work-related concerns with their supervisor or the Human Resources department rather than through social media. This policy is not intended to prohibit employees from using social media or otherwise violate Section 7 rights.

Monitoring and Enforcement – Where applicable law permits, Flanagan State Bank reserves the right to monitor employees’ use of any social media and to take appropriate action with respect to inappropriate or unlawful posts. The need to monitor may arise in cases where Flanagan State Bank has specific information about work-related misconduct or criminal activities, or unauthorized transfer of the employer’s confidential and proprietary information or Flanagan State Bank needs to comply with applicable federal, state or regulatory requirements. Flanagan State Bank will monitor social media to the fullest extent permitted by law and will take disciplinary action, up to and including termination, against those who violate the policy. In monitoring social media, Flanagan State Bank will not in any way interfere with any employee rights under Section 7 of the NLRA.

Ownership of Social Media Accounts and Work Product

All social media accounts, developments, and intellectual property (including computer programs, blogs, copyrighted works, online journals, and profiles on social networking sites such as Twitter, Facebook, LinkedIn, Instagram, etc.) created or used by employees for Flanagan State Bank or any of its DBAs or to promote and/or market Flanagan State Bank or any of its DBAs, including accounts featuring or displaying Flanagan State Bank’s or any of its DBA’s name and trademarks (collectively “Flanagan State Bank Work Product”), belong solely to Flanagan State Bank. Flanagan

State Bank shall own and have the right to control all Flanagan State Bank Work Product whether you open the account or use, manage, or access it. Flanagan State Bank Work Product includes any and all log-in information, data, passwords, trademarks, and content related to the account, including all followers, subscribers, and contacts. Flanagan State Bank Work Product shall include no social media accounts that are created or used by you exclusively for your own personal use. Flanagan State Bank shall not require or request you to provide personal social media account information or passwords in accordance with applicable laws.

You agree you will not create, develop, or maintain any Flanagan State Bank Work Product without Flanagan State Bank's express prior authorization. All approved Flanagan State Bank Work Product shall where possible be registered, in whole or in part, using the Flanagan State Bank's name and contact information.

After registration, the log-in and password information for all Flanagan State Bank Work Product shall be promptly reported to the Director of Marketing and shall not be changed without prior written authorization from the Director of Marketing.

If you have any questions about creating or managing a social media account for the Flanagan State Bank, please contact the Director of Marketing for guidelines and restrictions related to the creation, development, and maintenance of Flanagan State Bank Work Product and all business use of social media.

Upon Flanagan State Bank's request during employment or immediately after your separation from employment with Flanagan State Bank, you will cease accessing, using, updating, or modifying Flanagan State Bank's Work Product.

Upon your separation of employment from Flanagan State Bank, you understand that Flanagan State Bank will retain ownership and control of all Flanagan State Bank Work Product created or used during your employment, including all related data and information. Prior to your separation of employment, you agree to provide to Flanagan State Bank the login information, including the usernames and passwords, for Flanagan State Bank Work Product you created, modified, or used. You will also agree to assist Flanagan State Bank, both during and after your employment, with the transition and maintenance of Flanagan State Bank Work Product created or used by you during employment, including providing information that may be necessary to ensure Flanagan State Bank can access Flanagan State Bank Work Product.

Social Media Contractual Provisions Definitions

1. "Confidential Information" includes all data and information concerning the business of Flanagan State Bank which is proprietary and confidential, including but not limited to Trade Secrets, intellectual property rights, confidential strategic business initiatives (e.g., a new secret product line, acquisition, or "secret sauce"), customer requirements, customer lists, business plans, finances, sales and training methodologies, pricing, or confidential personal information about customers or employees (which is defined as another employee's social security number,

protected health information, credit card numbers, drivers' license numbers, mother's maiden name, complete date of birth, minor children's names).

2. "Copyrightable Works" are those defined by 17 U.S.C.A. § 102(a).

3. "Developments" means all inventions, whether or not patentable, Confidential Information, computer programs, copyrighted works, mask works, trademarks, including on any online journal or blog, or on any social media or social networking sites (such as Twitter, Facebook, LinkedIn, YouTube, etc.) and other intellectual property made, conceived, or authored by you, whether alone or jointly with others, while employed with Flanagan State Bank, whether or not during normal business hours or on Flanagan State Bank's premises, that are within the existing or contemplated scope of Flanagan State Bank's businesses when such Developments are made, conceived, authored, or which result from or are suggested by any work you or others may do for Flanagan State Bank.

4. "Trade Secrets" includes all information including, any formula, drawing, pattern, compilation including customer list, program, device, method, technique or process that derives independent economic value, actual or potential, from not being generally known to and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

Flanagan State Bank may monitor content out on the web; users who violate the Policy may be subject to discipline, up to and including termination of employment. If you have any questions about this policy or a specific posting out on the web, please contact Human Resources.

Flanagan State Bank Social Media Account Ownership Agreement

Social Media Account Name: _____

Social Networking Site: _____

Social Media Account URL: _____

Social Media Account Name: _____

Social Networking Site: _____

Social Media Account URL: _____

Social Media Account Name: _____

Social Networking Site: _____

Social Media Account URL: _____

I have read, and agree to, all provisions of Flanagan State Bank’s Social Media Acceptable Use Policy. I understand that the social media account(s) listed above and all related customer lists, friends, followers, content, usernames, passwords, and e-mail addresses are the sole property of Flanagan State Bank and may be used only in accordance with applicable policy for business purposes. I also understand that upon any separation from Flanagan State Bank, that Flanagan State Bank will retain ownership and control of all Flanagan State Bank Work Product created or used during my employment, and I will assist Flanagan State Bank with the transition and maintenance of Flanagan State Bank Work Product during my employment, including providing information that may be necessary to ensure Flanagan State Bank can access Flanagan State Bank Work Product.

Employee Name (Print): _____

Employee Signature: _____ Date: _____