

## SOCIAL MEDIA POLICY

CU Medicine understands that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media. This policy applies to all individuals who are employed by CU Medicine, and covers the use of social media both in and outside of the workplace.

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal website, social networking, video sharing or affinity web site, web bulletin board or chat room, and any other websites or applications that enable users to create and share content, whether or not affiliated with CU Medicine.

CU Medicine has created the following policies and procedures to help employees understand the unique issues raised by this new and evolving communication tool. Failure to follow these policies and procedures may result in disciplinary action, up to and including termination.

### Policy applies to personal social media

This Social Media Policy does <u>not</u> cover CU Medicine-sponsored social media, which is separately regulated. Instead, this policy covers employees who participate in personal social media or other Internet activities. This policy applies regardless of whether the conduct occurs during working or non-working time, and regardless of whether Company equipment is used.

If you have ideas for content that you believe should be communicated through CU Medicinesponsored social media, please reach out to CU Medicine's Content and Social Media Specialist.

### Know and follow the rules

Carefully read these guidelines, CU Medicine's Discrimination and Harassment Prevention Policy, and ensure your postings are consistent with these policies.

### Do not post confidential or HIPAA-protected content

Employees may not use social media in a manner that compromises the confidentiality of CU Medicine's confidential or proprietary information, trade secrets or other sensitive information. Trade secrets may include, but are not limited to, information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications. Employees may not post any private, restricted or confidential information regarding patients, may not post names or images of patients, and must otherwise follow all applicable regulations under the Health Insurance Portability and Accountability Act (HIPAA).

## Post only appropriate content

Express only your personal opinions. Never represent yourself as a spokesperson for CU Medicine. If CU Medicine is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of CU Medicine, fellow employees, associates, patients, or others working on behalf of CU Medicine. If you publish a blog or post online related to the work you do or subjects associated with CU Medicine, make it clear that you are not speaking on behalf of CU Medicine. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of CU Medicine."

Also, do not create a link from your blog, website or other social networking site to a CU Medicine website without identifying yourself as an employee of CU Medicine.

# Be honest and respectful

Never post any information or rumors that you know to be false about CU Medicine, fellow employees or associates, patients or others who work on behalf of CU Medicine.

Always be fair and courteous to fellow employees, associates, patients, or others who work on behalf of CU Medicine. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers, management or the human resources department than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage employees, associates, patients or others who work on behalf of CU Medicine, or that might constitute harassment or bullying. Examples of such conduct might 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 company policy.

Inappropriate posts that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

### No expectation of privacy

Regardless of any privacy settings on various social media platforms, social media is not private. Information becomes public the moment it is published on the Internet. Assume that co-workers and members of CU Medicine's management will see anything and everything posted online, and act accordingly.

Also remember that the Internet archives almost everything; therefore, even deleted postings can be searched.

### Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work related as authorized by your manager. Do not use your CU Medicine email addresses to register on social networks, blogs or other online tools utilized for personal use.

## You are responsible for your posts

If at any time you are uncertain about how to apply these policies and procedures or have any question about your participation in social media activities, you should contact a member of the human resources department.

Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees, or otherwise adversely affects other employees, associates, patients or others who work on behalf of CU Medicine, or CU Medicine's legitimate business interests, may result in disciplinary action, up to and including termination.

## **Retaliation is prohibited**

CU Medicine prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.