

LendMe

Web & Social Media Policy

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1. Version control

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2. Objectives and Rationale

LendMe's digital channels and its content (defined below in section 3) is vital to the successful promotion, positioning and operation of LendMe. It is important that all aspects of the digital channels and its content are designed, provisioned and maintained according to applicable legal requirements, best practices and to the highest quality possible. This Policy clarifies how LendMe governs this digital estate and also provides guidelines for Users when creating, publishing and maintaining content on behalf of LendMe.

This Policy objectives are:

- To outline the management and governance of LendMe's digital channels and its content.
- To provide a framework for the development, deployment, delivery and maintenance of LendMe's online digital estate.
- To inform Users of LendMe the rules in terms of usage of digital communication on the web and social media.

3. Scope and Intended Audience

This document covers policy, procedures and standards relating to the digital platforms or digital spaces through which information about LendMe, its products and industry information is provided, including:

1. The LendMe.dk domain and all subdomains and sub sites.
2. Any externally hosted LendMe website that has been developed on behalf of LendMe for any of its organisational units engaged in promotional activities
3. Official social media sites created by LendMe (including material for Staff)
4. LendMe profile pages created on third party sites such as Facebook, Twitter, LinkedIn, YouTube, etc.
5. Users use of LendMe accounts on third party social media sites or websites

This Policy governs the digital estate as outlined above, and applies to all Users.

4. Definitions, Owner and Related Policies

4.1. Definitions

For the purposes of this Policy, the following capitalised terms (which are used throughout this Policy) shall have the following meanings in the context of this Policy:

- Policy - This Web & Social Media Policy.
- Staff - All full-time and part-time employees of LendMe.
- LendMe IT Resources - IT resources provided by LendMe. This includes IT resources accessed remotely via without limitation:
 - LendMe's network and connected networks and to all equipment connected to those networks physically or via wireless.
 - Any networks created independently outside LendMe's, if they are connected to LendMe's network.
 - All LendMe-owned IT equipment including servers, desktops, laptops, tablets, mobile devices and network-related equipment.Any equipment owned by third parties, leased or personally-owned which use LendMe's network.
- Users - All Staff and External Parties.

4.2. Owner

The Chief Marketing Officer (CMO) is responsible for the governance of LendMe's digital estate, and the owner of this Policy.

4.3. Related Policies, instructions and guidelines

Please note that certain additional LendMe policies and procedures supplement this Policy and should be read in conjunction with this Policy. All Users should ensure compliance with all relevant LendMe policies and procedures.

These include but are not limited to the following:

- **Acceptable Usage Policy**

5. Policy Statement

5.1. The LendMe Website Policy

The LendMe website (LendMe.dk or other local domains) is the sole property of LendMe; while certain Staff will have access to edit certain portions of the site, create new content, and remove old content, the site and all its sub-sites remain the property of LendMe.

The content on the LendMe website is ultimately the responsibility of the CMO (or their nominee). Any requests for changes to LendMe homepage content must be made through or in collaboration with the CMO and will be reviewed on a case-by-case basis. Any structural changes needs to be made through the CMO and CPO in unison.

5.2. Social Media Policy

Users must at all times use social media sites in a responsible manner, having due regard to the rights and reputation of LendMe and of others. In particular, Users are required to comply with the following rules:

- Do not use social media sites for any purpose which is prohibited under the terms of the Acceptable Usage Policy.
- Do not use social media so as to contravene or breach the laws of Denmark, specifically in relation to: privacy rights, defamation law and data protection law.
- Do not use social media sites to engage in any form of bullying or behaviour which is illegal or likely to cause harassment to others (e.g. stalking, grooming of minors, etc.).
- Do not excessively duplicate previously posted communications (other Users may consider this as spam).
- Do not impersonate any other person nor engage in trolling (i.e. intentionally insulting and harassing people via the Internet).
- Do not post any material which breaches the intellectual property rights of third parties (e.g. logos, written works, diagrams, pictures, music, video/film clips, etc.); where necessary the express permission of the rights holder should be obtained.
- When posting as individuals, Users are asked to consider that it may be appropriate for them to identify any personal views expressed by them, on third party websites, as their own and not representing LendMe (for example the following disclaimer is often stated on twitter accounts: "all views expressed here are my own and don't reflect the views of my employer"). Please refer to the Acceptable Usage Policy for further clarification.
- Do not post material which is confidential and proprietary to LendMe or which could have the effect of damaging the reputation of LendMe or the privacy or reputation of any third party.
- Do not post material which would identify a third party (e.g. comments, photographs, video clips etc.) without the express permission of the third party concerned.
- Ensure that information posted is accurate and not misleading.
- Do not post material for the purpose of embarrassing people or which will bring that person or LendMe into disrepute.
- Do not use the name of LendMe, including any emblems or logos, to promote their own commercial objectives or activities.
- Do not use the name of LendMe, including any emblems or logos to imply that LendMe endorses an activity without its prior written consent.
- Respect LendMe time and property: LendMe IT Resources are reserved for the use of Users for LendMe related business, research and study.

5.3. Official LendMe Social Media Accounts

The CMO or any person appointed by the CMO shall maintain the official LendMe social media account on any given social media platform. The following is a link to a list of official LendMe social media accounts:

<https://LendMe.dk/kundeservice>

Only the CMO (or his/her nominee) may set up an official social media account on behalf of LendMe, and the CEO and CPO needs to be notified when such an account is set up.

The operation of some official LendMe social media accounts may be devolved, with permission from the CMO and CPO in unison, to an office or an external provider.

All official LendMe social media accounts shall be operated within the rules established in this Policy.

All official LendMe social media accounts shall contain a link (where feasible and relevant) to this Policy.

5.4. LendMe Organisational Unit Social Media Accounts

- If relevant - only the CMO (or their nominee) may approve the set up of a LendMe organisational unit social media account.
- A LendMe organisational unit social media account must have the initials "LendMe" in the account name (preferably at the beginning of the name e.g. LendMe IT or LendMeCustomerSupport).
- All LendMe organisational unit social media accounts shall contain a link (where relevant and feasible) to this Policy.

5.5. Third party social media sites

Third party social media sites, such as Facebook, Twitter, YouTube and LinkedIn are used at the User's own risk and since LendMe has no control over these sites, LendMe cannot take any responsibility for data stored on these sites. Users should familiarise themselves with the terms and conditions governing all social media sites and adhere to these conditions, in addition to the regulations set out in this Policy. Users should ensure that they protect themselves, read and familiarise themselves with any privacy policy governing the site to ensure that they are happy with the uses and disclosures that may be made of their data. It is recommended that Users maintain the highest possible privacy settings.

The following relate to the Twitter social media platform:

- You must use "LendMe" as part of your Twitter account name
- Keep the account name as short as possible to enable other Twitter users to retweet your tweets more easily and to reference your account more easily within the 280 character limit for tweets.

The following relate to the Facebook social media platform:

- You must use "LendMe" as part of your Facebook account name and Facebook page address.

The following relate to the Snapchat social media platform:

- You must use "LendMe" as part of your Snapchat account name
- Keep the account name as short as possible

The following relate to the Instagram social media platform:

- You must use "LendMe" as part of your Instagram account name

The following relate to the YouTube social media platform:

- You must use "LendMe" as part of your YouTube account name.

5.6. Notice and Takedown

Users are encouraged at all times to use social media sites in a responsible manner having due regard to the rights and reputation of LendMe and others.

- In the event of discovering a posting to a LendMe social media account that is thought to contravene this Policy, notice must be sent to info@LendMe.dk to have the posting removed.
- The CMO and CEO will review the posting and determine if the posting does contravene this Policy.
- If it is determined that the posting does not contravene this Policy, it will be left in place.
- If it is determined that the posting does contravene this Policy, it will be removed as soon as is practical and a notice sent to the original poster informing them of the reason for its removal.
- Repeated postings that contravene this Policy from the same user will lead to the user in question being blocked and where they are a User, disciplinary procedures may be undertaken.

5.7. Think before you post

Even where social media accounts have been deactivated, copies of user information may still remain online. Before posting content on a social media site, Users should consider the permanent online footprint they are creating in doing so.

The nature of the Internet provides unique opportunities for copying and dissemination of information, regardless of the originator's intentions. Users should think carefully about whether they are happy for their information to be made available in this manner, not just now, but into the future.

6. Ongoing Compliance

LendMe reserves the right to monitor, intercept and review, without notice, the postings and activities of Users where there is reason to suspect that this Policy is being breached, or where deemed necessary by LendMe for other legitimate reasons. The CMO will ensure that every User using social media platforms is acquainted with this Policy, and that it should be adhered to at all times.