



SOCIAL MEDIA POLICY

We recognize social media encompasses a broad sweep of online activities that integrate technology, social interaction, and content creation. However, we also recognize that the rapid evolution of technology makes it difficult to identify all types of social media. Social media uses many technologies and forms, such as blogs, wikis, photo and video sharing, podcasts and social networking that build a virtual footprint. This policy is not meant to discourage you from utilizing social media. We take no position on your decision to start or maintain a blog or participate in social media/networking activities.

We want to remind you that the use of social media technology follows the same standards of practice and conduct outlined by the company in the employee handbook. Accordingly, Sunshine Village expects employees who maintain or contribute to social media on the internet will abide by certain guidelines.

Nothing in this policy is meant to be construed to prohibit or limit employees' rights to engage in protected concerted activity as prescribed by the National Labor Relations Act, or any other rights protected under federal and state law.

Outside the workplace, your rights to privacy and free speech protect legal online activity conducted on your personal social networks with your personal online account. However, what you publish on such personal online sites should never be attributed to Sunshine Village and should not represent in any way that you are speaking on Sunshine Village's behalf without prior written authorization to do so.

We prohibit the use of social media to post, or display comments about co-workers, supervisors, the company or our clients that are illegal, vulgar, obscene, threatening, intimidating, harassing, or a violation of the employer's workplace policies against discrimination, unlawful harassment, or hostility on account of age, race, religion, sex, ethnicity, nationality, disability, and any other category protected under state or federal law. Employees should remember that any information that is shared online instantly becomes permanent and public. Remember, that what you post online will be captured forever and can be transmitted endlessly without your consent or knowledge. Sunshine Village also wants to remind you that each employee is personally liable for his or her own commentary and can be sued by other employees, clients, competitors and any other individual or company that views the on-line content as proprietary, unlawfully harassing, libelous, creating a hostile work environment, or otherwise illegal.

Employees are expected to protect the confidential, proprietary and trade secret information of Sunshine Village. Employees are prohibited from disclosing at any time proprietary or confidential information learned during the course of their employment about the company or

its clients. Such information includes but is not limited to customer lists, trade secrets, financial information and strategic business plans. This policy also includes personal information about clients and employees that is protected from unauthorized disclosure by law, including, but not limited to, personal health information and personal data, such as driver's license, social security number, financial account numbers, or credit/debit card numbers.

Employees should not use employer-owned equipment, including computers, company-licensed software or other electronic equipment, nor facilities or company time, to conduct personal blogging or personal social networking activities.

Those individuals with supervisory/management responsibilities, by virtue of their position, must consider whether "friending" or personal thoughts they publish, even in clearly personal venues, may be misunderstood as expressing the Sunshine Village's position. They should assume their employees and those outside Sunshine Village will read what is written. A public blog is not the place to communicate Sunshine Village policies to employees.

We ask that each employee honor the privacy rights of our employees by seeking their permission before writing about happenings that might be considered to be a breach of their privacy and confidentiality or before posting their pictures. Posting information about other employees without their permission has the potential of disrupting the workplace. By maintaining your coworkers' privacy, you will be helping to maintain the professional work environment at the company.

In short, use your best judgment. Social media changes rapidly and there will likely be events or issues that are not addressed in this policy. If you have any questions about these guidelines, contact your supervisor or the Human Resources Department. When in doubt, employees should seek the guidance of the appropriate person before posting or otherwise engaging in online activity.

Violation of this policy may result in discipline up to and including termination of employment.