



## Sony Interactive Entertainment Social Media Policy for Contractors

Modified  
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This Sony Interactive Entertainment (SIE) Social Media Policy applies to all SIE contractors, subcontractors, consultants, vendors and other individuals and companies (“Contractors”) who work with SIE, and who use social media for business or personal matters. All Contractors are expected to be familiar with this policy and to adhere to its terms, as well as the terms of any agreements in place between Contractor and SIE. Additionally, Contractors who are given access to SIE’s electronic mail system or Internet/Intranet connectivity via SIE resources must comply with SIE’s Email, Internet & Electronic Content Policy.

SIE may modify this policy at any time without notice. Contractors should periodically review this policy or ask for updates to it to ensure their compliance with its terms.

If you are uncertain of how these policies apply to you or have questions, please contact your SIE business representative or SIE’s Director of Corporate Compliance.

### **SOCIAL NETWORKING SERVICES**

A social media service is any online service, platform or site that allows users to share publicly or disseminate information online. Popular social media services include Internet forums, weblogs, social blogs and microblogs, virtual game and social worlds, and photo and video sharing sites, including Facebook, Twitter, LinkedIn, MySpace, YouTube, Foursquare and Pinterest.

### **SOCIAL MEDIA RISKS**

Common online threats such as viruses and malware have long been associated with Internet use. Social media services present unique risks to both individuals and corporations alike.

For individuals, the informal, personalized atmosphere of social media tends to foster an increased level of trust amongst its members. Consequently, individuals are more inclined to visit links or download content that they would otherwise scrutinize if presented via another channel of communication. Attackers will often exploit this trust by using “phishing” or other social engineering tactics to gain access to personal information or, perhaps, to coerce individuals into performing specific actions, unbeknownst to currently logged-in victims.

For corporations, social media has proven beneficial in the areas of marketing, recruiting and solicitation of customer opinions. Risk management and information technology departments are discovering, however, that corporate employees and contractors are increasingly co-mingling personal and corporate information, thereby blurring the lines between an individual’s Internet communications and those of a corporate representative. An employee’s or contractor’s expression of personal opinion can be misinterpreted as an official communication or pronouncement of SIE, and this can have negative legal, public relations and other consequences for the company.

## **SOCIAL MEDIA USE GUIDELINES**

Contractors must abide by the following usage guidelines for social media at all times:

1. Be aware that posted information will be public. Contractors should not expect that information they post on social media will be private. Once you post information, assume that anyone with Internet access can see it, even if you think that you have limited to distribution to “friends,” “family” or another limited list of persons. You should assume that your posts will be monitored by media, SIE’s competitors or other third parties who may benefit from exploiting the information.

2. Do not disclose confidential or sensitive information. As a Contractor, you have access to confidential, non-public and sensitive information relating to SIE’s business, products and services, including trade secrets, as well as to confidential, non-public or sensitive information of SIE’s partners and affiliates. You must not disclose this type of information for any reason at any time via any media, including social media, unless SIE has authorized you to do so. For example, you should not post on Facebook that you are working on a new game, especially if SIE has not made an announcement about the new game, nor should you post a picture or video of the game. You have an on-going obligation not to disclose any confidential or sensitive information about SIE, our affiliates and our partners even after you complete your services for SIE and your role as a Contractor for SIE terminates.

If you are uncertain if certain information is confidential, non-public or sensitive, speak with your manager or SIE business representative as appropriate.

3. Do not misrepresent. You must not present yourself as a representative of SIE with the authority to speak on SIE’s behalf on social media. If your agreement with SIE requires you or your company to make official statements on behalf of SIE, you must work directly with your SIE business representative to properly execute the required program. In all cases, you must provide SIE with the actual announcement to be made and obtain SIE’s prior written approval for that announcement.

4. Provide disclosures if you are commenting about a PlayStation product or service. Special requirements apply to publishing promotional content online, including any content designed to endorse, promote, sell or advertise PlayStation products and services. Unless your scope of work with SIE requires you to expressly promote or provide feedback regarding SIE, a PlayStation product, service, event, promotion, sweepstakes, contest or other matter, SIE does not require you to endorse or provide positive comments about SIE or PlayStation products and services. If, however, you decide to make personal comments about SIE or PlayStation products or services on social media, including any of SIE’s official sites (i.e., you contribute to a blog, write a product review or leave a “wall post”), you must disclose that you are a SIE Contractor, even if you did not receive the product or service for free or at a discounted price, and you must use a disclaimer that your comments represent your personal opinion and not that of SIE. If you have been issued a SIE e-mail address, you should not use your SIE e-mail address in connection with your personal social media activities or any other activities outside of

your scope of work for SIE. SIE e-mail addresses are intended for use in SIE business matters. Please refer to SIE's Email, Internet & Electronic Content Policy for more information.

5. Ensure employee and subcontractor compliance with this Policy. You are responsible for ensuring that all of your employees (if applicable) comply with this Policy. If you use third party subcontractors to provide services relating to SIE, you must also require that all such subcontractors comply with this Policy. You must require your employees and subcontractors to comply with the disclosure requirements set forth in section 3 above, whether or not they received any compensation directly or indirectly from SIE. SIE may require you, your employees and subcontractors to use a SIE-approved disclosure notice with placement of the notice to be determined by SIE. Additionally, you must implement a system to continuously monitor and audit your employees' and subcontractors' compliance with these requirements. You are responsible for your employees' and subcontractors' compliance with applicable laws and regulations, the terms of your agreement with SIE and this and any other applicable SIE policy.

6. Do not make harassing or obscene statements. You should refrain from making statements about SIE or employees of SIE or its affiliates, partners and Contractors that are harassing, obscene, vulgar, threatening, intimidating or that violate SIE's policies against discrimination, harassment, or hostility on account of race, sex, religion, color, national origin, age, mental or physical disability, marital status, veteran status or any other factor protected by federal or state law.

7. Do not use SIE's or any SIE partner's logos, trademarks or copyrighted material. Outside of job-related responsibilities that require it, SIE does not grant Contractors a license to use or share its assets, including on social media. Contractors should avoid use of SIE's intellectual property (i.e., logos, trademarks or copyrighted materials) or its partners' intellectual property on any website or social media service, including use of assets as part of any screen name, user name or user ID or handle, unless the use is for an approved business purpose. Contractors should not post a picture or video from SIE's video games, even if the game has been publicly released. If an agreement between SIE and Contractor expressly permits a Contractor's use of names, trademarks or copyrighted materials of SIE, our affiliates or our partners, Contract must comply with that agreement's terms and follow all applicable trademark usage guidelines.

8. Respect the privacy of SIE employees. In your role as a SIE Contractor, you must respect the privacy of SIE's employees. You should not disclose any SIE employees' personal information or post their pictures without their permission. Doing so may contribute to harassment and create a hostile work environment.

## **ENFORCEMENT**

If SIE determines that you, your employees or subcontractors have violated this policy or believes that your activity presents a significant risk to SIE, SIE may suspend or block your access or activity without notice or require you to revise or delete a posting, comment or social media account, and SIE may immediately terminate its agreement with you without liability. Additionally, you and your company may be subject to civil and criminal action.