

Bank of England Mortgage

SOCIAL MEDIA AND NETWORKING POLICY

PURPOSE

This policy outlines procedures and processes related to the use of social media and networking resources by Bank of England Mortgage, its personnel and others, formalized by the Board of Directors of Bank of England.

POLICY STATEMENT

General

Bank of England Mortgage realizes that in addition to traditional communication and marketing methods, a legitimate business need and purpose exists to market itself and its products and services by utilizing social media and networking channels. The use of social media and networking (such as Facebook, LinkedIn, Twitter, blogs, wikis, etc.) provides Bank of England Mortgage with a unique opportunity to:

1. Enhance its existing marketing efforts to generate additional interest in the Bank, its people, and the products and services offered;
2. Create additional business opportunities and explore new markets;
3. Promote and raise awareness of the Bank's brand;
4. Announce Bank or financial industry related activities or events;
5. Participate in financial industry interactive discussions with customers, Bank personnel, and others;
6. Promote the sharing of ideas and information on key topics; and
7. Respond to breaking news.

However, the use of social media and networking channels by Bank of England Mortgage and its employees poses a degree of risk, including but not limited to, risk arising from compliance with all applicable laws, rules and regulations, privacy, confidential and proprietary information, reputation, and other key areas of risk. As such, it is the policy of Bank of England Mortgage to take advantage of the opportunities presented by the use of social media and networking technology by implementing appropriate information technology, communication, personnel resources, and other key measures to mitigate such risks in order to enhance its communications and marketing efforts and exchange information to meet its business mission and goals.

Program Overview

In general, Bank of England Mortgage's Social Media and Networking Program includes the following key elements:

1. The overall use of social media and networking technology and related resources by the Bank, its personnel and others is primarily based upon a legitimate business decision approved by the Board of Directors and Senior Management that takes into consideration Bank's mission statement and goals, customer base and intended audience, risks and mitigating safeguards, technical capabilities, and potential benefits.
2. The mortgage division's marketing department, with the concurrence and approval of Senior Management, is ultimately responsible for determining who is authorized to use social media and networking on behalf of the mortgage division and its related branches and departments, including appropriate access levels.
3. It is the responsibility of each designated branch or department, with the concurrence and approval of the respective officers, to establish and maintain content posted to their portion of the social media and networking sites and to establish and maintain measures to prevent inappropriate or technically harmful information and links.
4. Bank of England Mortgage personnel and others are restricted to only utilize Bank approved social media and networking resources for hosting official social media and networking sites. Such social media and networking sites are to be created and maintained in accordance with the guidelines of this policy and must have appropriate and easily identifiable characteristics of an official site of the Bank that is in compliance with all related laws, rules and regulations.

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5. Branch and department use of Bank of England Mortgage's social media and networking resources is to be documented and maintained in an easily accessible format that tracks information and preserves items that may be considered a record subject to disclosure or any other document retention requirements under federal or state law.
6. Bank of England Mortgage's social media and networking sites are to be monitored on a regular basis and prompt corrective action is to be taken by appropriate personnel in the event an issue arises that places, or has potential to place, the Bank or BANK OF ENGLAND MORTGAGE at risk.
7. The same standards, principles and guidelines that apply to BANK OF ENGLAND MORTGAGE personnel in the performance of their assigned duties apply to the use of Bank of England Mortgage's social media and networking resources.

Applicability

This policy applies to all Bank directors, officers, BANK OF ENGLAND MORTGAGE employees and approved third party entities, such as consultants, service providers and contractors, performing business on behalf of Bank of England Mortgage (referred to as "individuals of the Bank") in relation to the use of social media and networking and its resources during work hours. In addition, this policy applies to such personnel with regards to the use of social media and networking outside of normal working hours in the event the individual affiliation with Bank of England Mortgage is identified, known or presumed.

Violations to Policy

The use of social media and networking by individuals of Bank of England Mortgage is strictly limited to legitimate business purposes only. Any individual of the Bank found to be in violation of this policy will be subject to disciplinary action and/or termination, removal from or omission of re-nomination to the Board of Directors and possible financial restitution. In addition, it is the responsibility of any individual of Bank of England Mortgage who knows or suspects a violation of this policy to immediately report the matter to his or her direct supervisor.

Enforcement

Changes to this policy require approval by the marketing department and Board of Directors of the Bank. Changes in operating procedures, standards, guidelines and technologies, provided they are consistent with this policy, may be authorized by the marketing director.

The Board of Directors has the authority to approve this policy, and annually approves the merit thereafter. Senior Management is responsible for ensuring the directives are implemented and administered in compliance with the approved policy.

The primary responsibility for enforcement of this policy and its operating procedures rests with the respective department or branch manager.

No part of this policy or its supporting operating procedures should be interpreted as contravening or superseding any other legal and regulatory requirements placed upon Bank of England Mortgage. Protective measures should not impede other legally mandated processes such as records retention or subpoenas. Any conflicts should be submitted immediately to the marketing director and internal legal counsel.

Communication

It is the responsibility of each designated branch manager to notify the marketing department (marketing@boemortgage.com) of all social media being used by the branch and its individuals.

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RISK MANAGEMENT

The Bank has implemented an effective Social Media and Networking Risk Management Program, which is part of the Bank's overall Risk Management Program and approved by the Board of Directors, specifically tailored to meet its needs and circumstances.

STRUCTURE OF ACCOUNTABILITY

Board of Directors and Senior Management

The Board of Directors has the ultimate responsibility to ensure the proper management of Bank of England Mortgage's Social Media and Networking Program. To this end, the Board of Directors has charged Senior Management with the responsibility to determine the necessary course of action to ensure effective promotion of Bank of England Mortgage and its products and services and adherence to appropriate laws, rules and regulations in an effective and consistent manner for the entire organization.

Corporate Marketing Director

The Bank of England Mortgage Marketing Director is to make a written report to the Compliance Director who will provide to the Board of Directors on an annual basis regarding the status of the activities and results with respect to Bank of England Mortgage's Social Media and Networking Program.

APPROVED SITES AND CONTENT STANDARDS

General

It is the policy of Bank of England Mortgage that:

1. Authorized individuals of Bank of England Mortgage only utilize social media resources approved by the Board of Directors and Senior Management for hosting official Bank of England Mortgage social media and networking sites;
2. Usage standards are developed and maintained for each approved social media and networking resource to optimize use of the site in correlation with Bank of England Mortgage's overall business mission and the guidelines contained in the Access, Use and Behavior Standards topic of this policy, and must have appropriate and easily identifiable characteristics of an official site of the Bank (such as the Bank's name, logo, product names or brands, contact information, etc.) that is in compliance with all related laws, rules and regulations.
3. Social media and networking accounts are to be created using an official Bank of England Mortgage e-mail account whenever possible.
4. Social media and networking sites display, or provide a link to, Bank of England Mortgage's social media and networking disclaimer and any other applicable policies or official statements.
5. The Marketing director at Bank of England Mortgage is responsible for maintaining a list of approved social media and networking resources for the mortgage division.
6. Approved social media and networking resources are reviewed on at least a calendar quarterly basis for changes to terms of use agreements and/or new/expired offerings.

Approved Social Media and Networking Resources

Bank of England Mortgage Lending participates in the following social media and networking resources:

A. BLOGS;

B. FACEBOOK;

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- C. LINKEDIN;
- D. TWITTER;
- E. YOUTUBE;
- F. INSTAGRAM

Content Standards

The following represents Bank of England Mortgage's standards for establishing and maintaining content posted to its social media and networking sites:

1. Bank of England Mortgage's website is to remain the primary and predominant source for its presence on the Internet and for providing information about the Bank and its products and services, regardless of the extent Bank of England Mortgage participates in social media and networking resources;
2. It is the responsibility of each designated branch manager or department, with the concurrence and approval of the respective officers, to establish and maintain content posted to their portion of the social media and networking sites and to establish and maintain measures to prevent inappropriate or technically harmful information and links;
3. All content is to fully comply with Bank of England Mortgage's Social Media and Networking Standards and is to be in compliance with all related laws, rules and regulations. In addition, information and comments shared through social media and networking channels is to fully comply with all related Bank of England Mortgage policies, procedures and processes and prohibit the disclosure of confidential or proprietary information;
4. Sharing or posting content owned by others is to be performed in accordance with copyright, fair use, and other established laws, rules and regulations pertaining to materials owned by others (such as quotes, images, documents, links, etc.);
5. Electronic information posted to a social media and networking site by Bank of England Mortgage is to be considered a record subject to all applicable federal or state laws, rules and regulations. Please refer to the following link for social media regulations
<http://www.ftc.gov/os/2013/03/130312dotcomdisclosures.pdf>
6. **The following is never allowed on any social media:**
 - A. Mortgage Rates
 - B. Misleading Content and Promises
7. **ALL social media must contain the following:**
 - A. **Facebook:**
 - a. Loan Officers Name, Title and NMLS# in name
 - b. Approved Company Logo and Equal Housing Lender Logo (in Cover Page photo)
 - c. **Must have the following Disclaimer in the "About" Section/ "My Story" Section:**
 - i. *This is not a commitment to lend or extend credit. All loans are subject to credit approval including credit worthiness, insurability, and ability to provide acceptable collateral. Not all loans or products are available in all states or counties. Bank of England Mortgage is a division of Bank of England. NMLS 418481. Member FDIC.*
 - B. **Instagram:**
 - a. Approved Company Logo in Profile Picture
 - b. Loan Officers Title and NMLS# in "BIO" section
 - c. **Must have the following Disclaimer in the "BIO" section:**
 - i. *Bank of England Mortgage is a division of Bank of England. NMLS 418481. Member FDIC. Equal Housing Lender.*

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C. Twitter:

- a. **Approved Company Logo and Equal Housing Lender Logo (in Cover Page photo)**
- b. **Loan Officers Title and NMLS# "BIO" Section**
- c. **Must have the following Disclaimer in the "BIO" section:**
 - i. *Bank of England Mortgage is a division of Bank of England. NMLS 418481. Member FDIC. Equal Housing Lender.*

D. LinkedIn:

- a. **Loan Officers Title and NMLS# in name "Headline"**
- b. **Approved Company Logo and Equal Housing Lender Logo (in Cover Page photo)**
- c. **Must have the following Disclaimer in the "BIO" section:**
 - i. *Bank of England Mortgage is an Equal Opportunity Employer. It is the policy of the Company to provide equal employment opportunities to all qualified applicants without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, protected veteran or disabled status, or genetic information. This is not a commitment to lend or extend credit. All loans are subject to credit approval including credit worthiness, insurability, and ability to provide acceptable collateral. Not all loans or products are available in all states or counties. Bank of England Mortgage is a division of Bank of England. NMLS 418481. Member FDIC.*

8. Bank of England Mortgage's use of social media and networking sites is not intended in any way to guarantee the right of protected free speech. As such, it is the responsibility of the respective officers and each participating branch manager and department to monitor postings and take appropriate action when necessary, to protect general site visitors from inappropriate or technically harmful information and links for their specific areas of responsibility;
9. In the event that Bank of England Mortgage participates in social media and networking sites that allow public comment, it will inform visitors of the intended purpose of the site and provide a clear statement of the discussion topic introduced for public comment so that the public is aware of the limited nature of the discussion and that inappropriate posts are subject to removal, including but not limited to the following types of postings regardless of format (text, video, images, links, documents, etc.):
 - A. Comments not topically related;
 - B. Offensive language or content;
 - C. Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regards to public assistance, national origin, physical or mental disability or sexual orientation;
 - D. Sexual content or links to sexual content;
 - E. Solicitations of commerce;
 - F. Conduct or encouragement of illegal activity;
 - G. Information that may tend to compromise the safety or security of the public or public systems; or
 - H. Content that violates a legal ownership interest of any other party.

ACCESS, USE AND BEHAVIOR STANDARDS

General

All individuals of Bank of England Mortgage should always be mindful of Bank of England Mortgage's position and reputation in the community. Since the success of any mortgage operation depends on public trust, it is extremely important that all individuals of Bank of England Mortgage conduct affairs related to social media and networking in such a way as to avoid discredit or embarrassment to themselves or to Bank of England Mortgage. As an example, such behavior, including, but not limited to, the posting of any remarks or statements regarding Bank of England Mortgage or its business interests that may be misconstrued in a way that could damage Bank of England

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Mortgage's goodwill and business reputation, even indirectly, should not be made. Personal behavior and appearance should, likewise, be governed by both common sense and good taste. Individuals of Bank of England Mortgage are expected to provide complete and truthful information in dealing with Bank of England Mortgage.

While conducting Bank of England Mortgage business or representing Bank of England Mortgage, all individuals of the Bank are expected to conduct themselves in a nondiscriminatory manner with BANK OF ENGLAND MORTGAGE customers, vendors, employees, and the general public. Bank of England Mortgage's policy prohibits discriminatory conduct due to race, age, color, religion, national origin, sex, veteran status, disability, or any other basis protected by federal, state, or local law. Discriminatory behavior not only is illegal, but it also diminishes good customer, vendor, and employee relations, all of which are essential to the success of Bank of England Mortgage.

Confidential Information

During the course of performing Bank of England Mortgage related duties, individuals of Bank of England Mortgage may hear or acquire a great deal of confidential information and intellectual property about Bank of England Mortgage, present and prospective customers, suppliers, shareholders and other staff members. That information must be held in the strictest of confidence during the term of the individual's employment and after termination for any reason. It is to be used solely for corporate purposes and never for personal gain. Under no circumstances should such information be transmitted to persons outside the Bank, including family or associates, or to other individuals of Bank of England Mortgage (unless they have a specific need to know information to discharge their duties). The only exceptions to this policy would be routine credit inquiries, information released in the normal course of business (i.e., disclosures required by legal process, and information authorized for release by customers). **Under no reason should such information be submitted or communicated through the use of social media and networking for any reason.**

Personnel Access and Authorized Use

Access to Bank of England Mortgage's social media and networking resources is limited to only authorized and designated individuals of Bank of England Mortgage who are responsible for performing official duties on behalf of Bank of England Mortgage in accordance with all information and security controls. It is the responsibility of branch and department managers, in coordination with the Marketing Director, to determine who is authorized to access and use of Bank of England Mortgage's social media and networking resources for their area of responsibility, and for designating appropriate access levels by:

1. Limiting access only to those with a clear business purpose to use the forum;
2. Provide appropriate access levels that include identifying what sites, or type of sites, the individual is approved to use, in addition to defining the user's capability (such as publishing, editing, commenting, or viewing only); and
3. Providing authorized users with a copy of this policy and requiring them to sign BANK OF ENGLAND MORTGAGE's Social Media and Networking Acknowledgement Form to acknowledge their understanding and acceptance.

The respective officers will keep a list of all individuals who have been granted access to social media.

Bank of England Mortgage's personal computers, laptops and mobile access devices used to access social media and networking sites are required to have current and continuously updated software to protect against destructive technical incidents or events, including but not limited to, cyber, virus and spyware/adware attacks. It is the responsibility of the Information Technology Officer and Information Technology Committee to ensure that all such equipment maintains these appropriate safeguards, and that authorized users have the ability to access Bank of England Mortgage's social media and networking sites and networks in accordance with Bank of England Mortgage's Information Technology Policy.

It is the policy of Bank of England Mortgage that any Bank hosted website must not contain automatic feeds to uncensored social media and networking site content. It is the responsibility of the respective officers, in coordination with the marketing director, to ensure that all branch and department managers maintain appropriate monitoring protocols for their area of responsibility to ensure content and links are appropriate and free from harmful technical attacks prior to approving content for display on websites.

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As a reminder, any activity conducted by or through Bank of England Mortgage's information technology resources or communication systems, including activities and postings related to social media and networking, remains the sole property of Bank of England Mortgage. As such, it is the policy of Bank of England Mortgage to reserve the right to monitor, intercept, access, record, disclose, inspect, review, retrieve, print and review without prior or further notice, any such activity conducted by individuals of Bank of England Mortgage. The Bank reserves the right to do so for the performance of operation, maintenance, auditing, security or investigative functions. Data sent over or stored on Bank of England Mortgage's information technology resources or communications systems may be read by Bank of England Mortgage management or other designated and authorized personnel. **Therefore, individuals of Bank of England Mortgage should have no expectations of privacy associated with submission or exchange of such data, including, not limited to, any e-mail, link, message, data file, document or image, video, post, telephone conversation or message, or any other kind of form of information or communication file or data transmitted to, received or printed from, or stored or recorded on the Bank's information technology resources or communication systems.** In addition, BANK OF ENGLAND MORTGAGE reserves the right to store copies of such data and communications for a period of time after they are created, and may delete such copies from time to time without further notice.

User Behavior

The same standards, principles, guidelines, policies, procedures, and processes that apply to individuals of BANK OF ENGLAND MORTGAGE in the performance of their assigned duties apply to the use of Bank of England Mortgage's social media and networking resources. As such, it is the policy of Bank of England Mortgage that authorized personnel are to:

1. Utilize Bank of England Mortgage's social media and networking resources only within the defined scope of their specific branch or department responsibilities, including compliance with all applicable laws, rules, regulations, Bank of England Mortgage policies, procedures, processes, and use agreements;
2. Strictly focus on subjects that add value that is specifically related to Bank of England Mortgage with respect to Bank sponsored blogs. As an example, such subject matter may include, but is not limited to, discussions that:
 - A. Generate additional interest in Bank of England Mortgage, its people, and the products and services it offers;
 - B. Educate customers, clients or others;
 - C. Assist coworkers in solving problems or issues and enhance productivity;
 - D. Contribute, directly or indirectly, to the improvement of Bank of England Mortgage products and services, policies, procedures and processes; or
 - E. Promote Bank of England Mortgage.
3. Indicate that comments or viewpoints are personal, be written in the first person, and may not reflect Bank of England Mortgage's views or opinions during personal social networking discussions. In addition, the comments or viewpoints are to be as accurate, professional, humble, and honest as possible at all times, be in a sentence case format (not all capital letters), and be reviewed through the use of spelling and grammar check proofing tools. Authorized personnel are personally responsible for the contents of such comments or viewpoints, and good judgment is to be used regarding the content of any posting. In the event a mistake is made, be the first to admit it, respond to it, and correct it as soon as possible. This can be accomplished by the modification of an earlier post rather than deleting it, but it should be made clear that the user has modified the original post to correct the error.
4. Carefully read, comprehend, and evaluate information posted by others for accuracy and truthfulness before responding. Always treat others with respect. Refrain from commenting on misrepresentations, accusations, personal, professional or credibility attacks, or other posts that are intended to incite conflict or online fights, are hostile or controversial, contain potentially inflammatory subjects, or exhibit inappropriate behavior. In the event that a response to a negative post or comment is required, prior approval from the Marketing Director and/or Senior Management must be obtained before a response is made;

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5. Obtain prior approval of professional recommendations (such as individuals, products and services, etc.) in writing from the Marketing Director and Senior Management;
6. Use a Bank of England Mortgage e-mail address when communicating on a social media and networking site or blog when working in an official capacity for Bank of England Mortgage (which implies to others that the user is acting on Bank of England Mortgage's behalf), and a personal e-mail address when communicating on a personal level (outside of Bank of England Mortgage business);
7. Accurately list reference sources of information owned by others when applicable to protect the user and Bank of England Mortgage against liability for brand, trademark, and copyright infringement, and any applicable laws, rules or regulations;
8. Strictly follow and adhere to the terms and conditions of use established for each venue used for social media and networking activities;
9. Carefully pay attention to security warnings that may pop up on a computer before clicking on unfamiliar links to avoid the risk of infection of virus, spyware, malware, or other forms of harmful unauthorized programs;

Individuals of Bank of England Mortgage are prohibited from using Bank of England Mortgage's social media and networking resources in a way that:

1. Establishes Bank of England Mortgage participated or hosted social media or networking site or blog without prior written approval from the Board of Directors and Senior Management;
2. Defames or disparages Bank of England Mortgage Lending, the Bank or its affiliates, directors, shareholders, officers, employees, customers, clients, business partners, suppliers, vendors, stakeholders, or any others in any manner, including any comments, material, images, graphics or video that might be considered obscene, offensive, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity such as ethnic slurs, sexist comments, discriminatory comments, insults, etc.;
3. Interferes with their work commitments and/or job responsibilities;
4. Provides links to Bank of England Mortgage's e-mail or website address(es) on a personal website, social media and networking site, or blog;
5. Announces any unauthorized press releases or news about BANK OF ENGLAND MORTGAGE, including acting as an unauthorized spokesperson if contacted by the media, press, or others;
6. Promotes the unauthorized use of Bank of England Mortgage's logos, brand names, trademarks, taglines or other trademarks;
7. Provides unauthorized positive or negative references for Bank of England Mortgage, the Bank or its affiliates, directors, shareholders, officers, employees, customers, business partners, suppliers, vendors, or other stakeholders in any manner which might create legal liability for the user and/or the Bank;
8. When acting in an official capacity for Bank of England Mortgage, working anonymously by using pseudonyms or false screen names;
9. Misleads or falsifies online credentials or professional attributes of the user, including the use of the terms of "specialist", "expert", or "authority", etc.;
10. Discloses any unauthorized confidential, proprietary or intellectual information regarding Bank of England Mortgage, the Bank or its affiliates, directors, shareholders, officers, employees, customers, clients, business partners, suppliers, vendors, stakeholders, or any others;
11. Harasses the Bank's directors, officers, employees, or others in any manner;
12. Circulates inappropriate or unprofessional material, such as links, photos or images, e-mails, chain letters, videos, etc.;

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13. Promotes or advertises commercial, personal, political or religious solicitation, or the promotion or advertisement of outside organizations unrelated to Bank business;
14. Requires a fee for participation or to be paid by a third party for participating;
15. Openly “friend” an unknown individual or an individual with whom no correspondent relationship has been established; or
16. Communicates Bank of England Mortgage related policies, procedures and processes.

NOTE: As a reminder, any individual of BANK OF ENGLAND MORTGAGE found to be in violation of this policy will be subject to disciplinary action and/or termination, removal from or omission of re-nomination to the Board of Directors and possible financial restitution. In addition, it is the responsibility of any individual who knows or suspects a violation of this policy to immediately report the matter to his or her direct supervisor.

Personal Social Media or Networking Site or Blog Participation

It is the policy of Bank of England Mortgage to respect the right of the individuals of Bank of England Mortgage to participate in social media and networking resources on their own personal time, and Bank of England Mortgage does not discourage or discriminate against such activity of self-expression, public conversation, and for other lawful purposes. Any individual of Bank of England Mortgage that participates in a social media and networking site, publishes a blog, posts a comment, or shares an image in a personal capacity outside of official Bank of England Mortgage business is generally protected by the rights of privacy and free speech when conducting such activity and/or using a personal e-mail address. However, any personal comments, viewpoints or opinions published within such public forums must never be attributed to, connected with, or have the appearance of being endorsed by, or originated from, Bank of England Mortgage. In the event an individual of Bank of England Mortgage chooses to list their affiliation with Bank of England Mortgage, the individual must make it clear that his or her views are personal, and may not reflect Bank of England Mortgage’s views and opinions. At a minimum, one of the following legal disclaimer statements should be used:

“The postings on this social media and networking site are my own personal views and opinions, and do not reflect the views and opinions of Bank of England DBA Bank of England Mortgage.”

“LEGAL DISCLAIMER STATEMENT: This is a personal social media and networking site, which was created, implemented and maintained on my own personal time and solely reflects my personal views and opinions. Any statements listed on this site do not represent the views, opinions, or policies of my past, current, or future employer, or any other organization or entity of which I may be affiliated with. All content on this personal social media and networking site is copyrighted.”

NOTE: The use of either legal disclaimer does not by itself exempt individuals of Bank of England Mortgage from adhering to this policy. An individual of Bank of England Mortgage is responsible for carefully considering whether his or her personal thoughts may be misunderstood as expressing those of Bank of England Mortgage, and assume at all times that his or her view or opinion will openly be read by the public.

Monitoring

It is the policy of Bank of England Mortgage that all approved social media and networking resources are monitored regularly and prompt corrective action be taken when an issue arises that places, or has potential to place, BANK OF ENGLAND MORTGAGE at risk. As such, it is the responsibility of designated management personnel who are acting as a social media and networking site administrator to:

1. Conduct reviews of site activity and content for exploitation or misuse;
2. Promptly track, respond and monitor any complaints received via social media and networking resources.
3. Immediately report perceived or known compromises to Bank of England Mortgage’s internal counsel and/or the Marketing Director.

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NOTE: In the event authorized personnel are unsure how to respond to, or concerned about the appropriateness of any statement or posting, the matter is to be referred to their immediate supervisor or the Marketing Director for assistance before any reply or action is taken.

RETENTION OF DOCUMENTATION

It is the policy of Bank of England Mortgage to properly document the use of social media and networking and retain it in an easily accessible format that tracks account information and preserves items that may be considered a record subject to disclosure under applicable federal or state laws, rules or regulations.

All site content, including content that constitutes public record, is to be maintained in accordance with Bank of England Mortgage's record retention schedule for two years. If the content constitutes a public record, it must be disclosed to the public unless an exemption applies.

Posts deemed technically harmful or inappropriate are to be promptly documented by the Marketing Director and/or the applicable branch or department manager that is responsible for maintaining the site as a matter of record retention and then removed.

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