

# Social Media Compliance Review

Legal & General America



Social media provides insurance producers with an opportunity to build and maintain relationships, and to promote themselves and the products they sell. When appointed producers use social media for personal or business purposes, and refer to Legal & General America, Banner Life Insurance Company and/or William Penn Life Insurance Company of New York, they must comply with the guidelines discussed below.

## Need-To-Know Definitions

**Companies:** The term “Companies” refers to Legal & General America, Banner Life Insurance Company and/or William Penn Life Insurance Company of New York.

**Producer:** The term “producer” refers to an individual and/or business that is appointed to market and sell insurance products offered by the Companies.

**Social Media:** The term “social media” refers to all internet-based applications that are now in existence or that may come into existence which allow users to create and exchange information and otherwise interact with each other. By way of example, social media applications include, but are not limited to Facebook, LinkedIn, Twitter, Google+, Instagram, Tumblr, and personal and professional blogs, to name a few.

Use of social media by a producer that is personal in nature is outside the scope of this policy. This would include a personal Facebook page or other social media that is not intended to develop your business of the Companies’ products.

## Types Of Social Media

Legal & General America’s social media guidelines differentiate between content that is static and content that is interactive. Static content is subject to review; interactive content is not, although there are some blurred lines.

**Static content** is planned and is less apt to change – like social network profiles, background images, or graphics that might accompany interactive content. Our company, like many other financial services organizations, views this content as similar to traditional advertising. Static content must be submitted for approval if it mentions Legal & General America (Banner, William Penn) products or services.

Examples of static content that requires approval: an ad for QDR to be placed on your Facebook wall, a graphic that mentions Legal & General America to be tweeted or pinned to a Pinterest board, an image that promotes OPTerm to be posted to LinkedIn. Some static content does not require approval like using our logo to identify us as one of the many companies with whom you have connections or as one you follow on a social media network. Using micro content created by Legal & General America does not require approval.

## For us, advertising is defined as:

Verbal, printed or written material designed to create interest in life insurance or in an insurance company, or to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a policy.

## Regardless of media format, if it fits the definition, it is an ad.

Newspaper  
Magazine  
Television  
Radio  
Internet  
Direct Mail  
Billboards  
Brochures  
Flyers  
Social Media  
Statement Stuffers  
Quote Software  
Presentations  
Form Letters  
Electronic  
Communications

## Materials created for purposes like these must be reviewed:

Interest Generation  
Broker Recruitment  
Rate  
Communication

Product information and especially any material made available to the general public.

The compliance review protects you, Legal & General America and its subsidiaries.

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**Interactive content** is content that changes. Its content which initiates conversation that invites response or responds to a social network conversation already underway. Facebook posts, tweets, instant messaging, and blog comments are examples of interactive content. This type of content doesn't need approval. You are however, expected to use good judgement and make sure you represent our industry professionally and responsibly. If you link to prepared materials, the materials must be submitted for approval prior to use (unless created by Legal & General America). Additionally, any discussions that provide advice and include specific personal or product information or pricing should be conducted offline.

## Guidelines

The following guidelines apply, regardless of whether the information consists of static or interactive content:

- All content must be accurate, truthful, and timely.
- Do not advertise by fax, text, robo call, prerecorded voice message, or auto dialer, or by using any vendor, software, or other technology that offers these services in contravention of the Telephone Consumer Protection Act (TCPA).
- Examples of static content requiring approval would include an ad for QDR on a Facebook wall, an infographic that mentions Legal & General America in a tweet or on a Pinterest board, or an image that promotes OPTerm on LinkedIn.
- Examples of interactive content not requiring approval would include comments that a producer makes in response to a social media post.
- Social media contents created by Legal & General America is already approved and does not need to be resubmitted for review.
- If your social media communication includes advertising of the Companies' products it must contain, link or appear on a page that includes the required disclosures including your name, street, city and state address, the Company's name and home office location and the product form number. Alternatively, you may provide a link to a website containing such information.
- Do not advertise or link to materials that are not approved for consumer use.
- Social media is a public forum. As such, when using social media do not communicate or collect anything that should not be public knowledge. Remember that social media should not be used to conduct real time discussions that provide advice and include specific product or pricing information.
- Always use good judgment about what you post. Remember that anything you post reflects on yourself and possibly the Companies.