



Agent Social Media Policy

Addendum to the Agent Advertising Guidelines

November 2013

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SCOPE

This Policy is intended as an addendum to the Agent Advertising Guidelines and applies to all insurance producers and agents appointed with North American Company for Life and Health Insurance® (the “Company”) who wish to use social media in any capacity including sales, marketing and recruiting. Under these guidelines, any promotion of the Company or its products through social media may be deemed advertising, and if so must comply with the Advertising Guidelines and this Policy.

PURPOSE

The purpose of this Policy is to provide North American producers, and their employees (i.e. assistants) with requirements and restrictions for advertising via Company sponsored social media or via social media that is supported by the Company, in which a producer affiliation with North American is acknowledged, recognized, or assumed.

DEFINITION OF SOCIAL MEDIA

While there are several ways to define social media, the Company defines social media as the participation and dissemination of information through the social interaction of various interconnected websites, whereby communications will be presented, viewed and reacted to in an open public domain.

Social media offers multiple ways to communicate with existing and potential clients via blogging, status updates, discussion boards, instant, direct, or private messaging. Some of the most frequently used social media sites today are Facebook, LinkedIn, and Twitter, although these are not the only social media websites. Any website that invites users to interact with the site and with other users falls under the definition of social media.

TYPES OF CONTENT

Social media can be either static or interactive.

Static content remains posted and is visible until changed or updated. It is generally accessible to all visitors. The Company views static content similarly to traditional forms of advertising such as print or television. Use of static social media that mentions the company name or specific product(s), must be submitted for approval prior to use and otherwise fully comply with the Advertising Guidelines.

Interactive social media content is “real time” content that may involve multiple parties and as such cannot be considered private. Interactive social media may be conversational and responsive to other people. Interactive social media will be treated and viewed as a public appearance. We will not require prior approval of interactive social media unless the Company name or specific product(s) are mentioned as outlined below. A general posting that references industry news or other useful information, or identifies the agent as a producer offering insurance products as financial solutions may be acceptable.

As mentioned, while it is acceptable for producers to provide general business information, such as “Independent Insurance Agent Offering Life Insurance and Annuities,” a specific mention of the Company name or specific product names in interactive social media could subject that posting or reference to review under the Advertising Guidelines. Using the Company name for a business purpose requires advertising review and pre-approval. The same process applies to static social media content that mentions the Company name or products. Using the Company name or product names in interactive social media does not discharge the responsibility that you must get prior approval for such usage. All other interactive social media usage will be deemed public appearance and will be reviewed post-use or upon our request.

Any time an interactive conversation crosses into a request for specific product information or recommendations, it should be immediately taken offline and discussed privately with a potential or current client.

RECORDKEEPING

Treat social media as any other form of advertising. It is important that you keep records and documentation that can easily demonstrate compliance with state insurance advertising laws and regulations and Company policy.

REGISTERED REPRESENTATIVES AND SOCIAL MEDIA

Registered Representatives are required to comply with the policies and procedures established by his or her broker-dealer regarding the use of social networking sites, which may be more restrictive than the guidelines we have established here.

The use of social networking sites (Facebook, LinkedIn, Twitter, etc) bulletin boards, websites, message boards, or other electronic communication systems on the internet for the purposes of advertising, soliciting business or in any way **communicating about Sammons Securities Company, LLC (SSC) business is prohibited unless specifically approved by the SSC Compliance Department.** As a securities licensed producer, you are responsible for maintaining your records in accordance with Rules 17a-3 and 17a-4 under Securities and Exchange Act of 1934 and FINRA Rule 4510, and any other updates or applicable securities regulations.

SOCIAL MEDIA PERSONAL USE VS. BUSINESS USE

Social media use that is personal in nature is outside the scope of this policy. This would include a personal Facebook page or other social media profile that is not used to develop or grow your business.

GENERAL GUIDELINES FOR BUSINESS USE

The following guidelines will be used in reviewing social media content. Please review them prior to posting or blogging on social media sites. Please note that these guidelines are not meant to be inclusive and additional requirements may apply.

- Current advertising guidelines and policies apply to content and material (status, updates, posts, video, text, audio clips, etc.) posted online. All state advertising regulations and standards must be adhered to when posting information to the Internet.
- All online advertising and sales material that specifically promotes the Company or Company products must be approved prior to use by the appropriate Advertising review teams as outlined in the current Agent Advertising Guidelines. When submitting content for review please include which social media site will be used, the intended target audience and the intended date of posting said content. As a reminder, content should remain generic in nature. Producers are responsible for the content published on the

Internet, including but not limited to blogs, wikis or any other user-generated media. Once material is published it is public and permanent.

- Follow applicable privacy laws and treat sensitive confidential information as such. Do not send confidential unsecured customer information through the Internet. Printing internal company information or confidential information requires permission. Respect and follow copyright laws.
- Be sure to read and comply with Terms and Conditions of all social media sites used.
- Keep the information broad in topic. If a customer desires to discuss the information in more detail, set up an offline meeting or follow up call. Do not make offers for an insurance product or recommendations via a social media platform.

BEST PRACTICES

The keys to success in social media are being honest and being thoughtful before posting, and respecting the purpose of the social media community.

Be Transparent—An authorized independent producer for a company should identify him or herself clearly. Never hide an identity for the purpose of promoting a company through social media. Use of social media should focus on a brand as a resource on issues relating to insurance or retirement planning solutions.

Be Thoughtful—Remember that this is a public forum; please do not communicate anything that should not be public knowledge.

Be Respectful—As with all forms of communications producers must be professional and respectful in online communications. It is critical to treat the Company, employees, producers, customers and competitors with respect. Do not post any material that is obscene, offensive, profane, defamatory, threatening, harassing, abusive, hateful, or embarrassing to another person or entity. Disparaging remarks and disrespectful communications may result in your Company or producer appointment being terminated.

Be Accurate—Be truthful in all marketing. Verify all the facts before disseminating any information. Online reputations are better served by verifying and sourcing the correct information the first time rather than having to post a correction or retraction. Specifically cite sources when possible.

If an error is made, correct it quickly and visibly.

Think Before Posting—There’s no such thing as a “private” social media site. Search engines can turn up posts years after the publication date. Comments can be forwarded or copied. Archival systems maintain information even if a post has been deleted. Ask “How will this look if everyone views it?” before posting.

BEST PRACTICES CONTINUED

Maintain Confidentiality—Do not post confidential or proprietary information about North American or its employees. Do not use or disclose any policyholder/annuitant identifiable information of any type on any social media.

Even if an individual is not identified by name within the information, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of law and Company policy.

Follow Fair Use and Copyright Laws—Linking to or citing another’s work is the best blogging policy. It is essential to respect copyrighted material and to source materials as appropriate. This includes copyright laws for text as well as images, videos, and music.

Be Responsible—Agents and their employees are personally responsible for posts, blogs, wikis, or other forms of online communication. Keep in mind that anything written online will remain online for a long period of time.

One of our Company’s core values is integrity and the Company expects agents to use personal responsibility whenever participating in online communication in any social media format. This includes breaching the trust of those with whom the agent is communicating. Conduct any advertising or promotion via social media with the same responsibility as is required with written material.

Uses of Logos, Service, or Trade Marks—Do not use the Company’s logo or service mark unless approved to do so by the Company. Any material that may be personally identifiable to the Company must go through the formal ad review process prior to use.

Do Not Be Confrontational—If misrepresentations about the Company are identified in the media, by analysts, or other online communicators, please notify the Company’s appropriate representatives. Do not engage in an interactive dialogue with the individual over social media.

RESTRICTIONS ON USAGE

Disparaging comments about our competitors and sending any material that would be considered offensive or inappropriate is strictly prohibited.

MONITORING

The Company conducts periodic reviews (including: audits, compliance examinations, risk management assessments) which will include the following subject matter related to social media use:

The Company monitors social media outlets and websites for use of Company and product names. If North American discovers its name or the name of its products is being promoted via social media, a review of records for prior approval will be required. Violation of the Social Media policy or Agent Advertising Guidelines could result in the termination of a contract and appointment.

FAILURE TO COMPLY

If the Company determines that a representative has violated the obligations under this Policy, the Company reserves the right to take action which may include, among other actions, termination of the contract and appointment. It is important to follow the Social Media Policy and Agent Advertising Guidelines.

Social Media Content Requiring Pre-Approval

STATIC CONTENT

All content that remains “static” or unchanged on your social media profile page or Company page. This is everything from the photo or graphics used to the descriptions about yourself or your company. Interactive content, also called “posts”, “tweets”, “pins”, or “status updates”, depending on the social media site being used, may also be subject to pre-approval. Please see examples of interactive content that may require pre-approval below.

NOTE: If you are a Registered Representative, you must comply with your Broker/Dealer’s policy, which may include adding particular information and disclosures directly onto your profile, or may entirely prohibit the use of certain social media platforms. Be sure to review your Broker/Dealer’s social media policy for this information.

Regarding LinkedIn Endorsements and Recommendations: it is required that these functions of LinkedIn profiles be turned off for Registered Representatives, and that “Skills and Expertise” keywords be listed as skills in the “Summary” portion of your profile rather than the “Skills and Expertise” section. SEC Rule 206(4)-1 of the 1940 Act (the “Testimonial Rule”) prohibits an IAR from utilizing testimonials; given that a recommendation or endorsement on a social media site is considered to be a testimonial. In addition, FINRA Rule 2210 requires that client testimonials be prominently noted as such with specific wording that cannot be adequately added to these sections.

Likewise, the use of “like” or “share” buttons on particular content could be construed as a testimonial or a recommendation. It is advised that agents do not “like”, “share”, or “comment” on content that would require pre-approval (listed below), specifically promoting a company or its products and services. Again, Registered Representatives must consult the social media policy of their Broker/Dealer for specific information about using social media, or any of its features.

ALL PROMOTIONAL MARKETING OR ADVERTISING

Any content that falls into the category of “advertising” will be subject to the same rules as advertising through any other medium (e.g. print, web, email, video, etc.). Social media is simply a new channel through which content can be communicated. Therefore, if that content is advertising the Company or its products in the following ways, it must be submitted for pre-approval before posting, even though it is in the interactive section of the social media site. Such types of posts include, but are not limited to:

- Videos about Products or Sales Concepts
- Marketing Materials (e.g. brochures, post cards, promotional emails, landing pages, Website content, and social media posts) or Any Other Repurposed Content Related To:
 - Products
 - Sales Concepts
 - Company Programs
 - Incentives, Rewards, Bonuses
 - Conferences & Company Events

Please note that social media posts made by North American which promote Company products, services, or sales concepts have been approved for corporate social media use only. If an independent agent or agency wishes to “like”, “share”, or otherwise redistribute social media content or company approved marketing materials that fall under the above categories of “advertising”, they must submit the social media post for approval prior to posting.

While North American encourages our social media community to share our content, it’s important to remember that as a licensed agent, you must abide by the regulations set forth by the entity which governs your license. Therefore, please consider the nature of the content and whether it requires pre-approval thoroughly before sharing it with your own social media network.

Be sure to thoroughly review the entire Agent Advertising Guidelines to make sure your social media content – both static and interactive – adhere to the guidelines for your protection.

Social Media Content Requiring Archiving For Post-Review

Certain interactive content does not require approval before you post it. However, you must retain records of your content in the event that a post-review is necessary.

Record Retention

In accordance with the North American Compliance Manual, it is important to maintain, and make available upon request to North American, the insurance department/division of your state, on any other regulatory agency with jurisdiction, a record of client information collected, whether or not the client elected to purchase a policy. Certain documents should always be maintained. These include:

- Original sales proposals;
- A copy of any needs analysis completed during the solicitation. North American makes a fact finding form available for use by its agents through its Website;
- A copy of any sales material and advertisements used during the sales process, including social media posts and correspondences made through social media platforms via email messaging features (e.g. “InMail” on LinkedIn) or interactive communications (e.g. comments on posts, chat transcripts, etc.).
- Any written correspondence to or from the policy owner regarding the solicitation, issuance of the policy, or subsequent service of the contract;
- Documentation of phone calls to or from the policy owner addressing the above issues;
- Notes from meetings with the policy owner; and
- A copy of the policy owner’s signed delivery receipt, if applicable.

State regulations vary regarding the length of time that client files are to be maintained. However, a general rule of thumb is to maintain all active client files indefinitely and all inactive files for seven years.

Visit the Training Center section of NorthAmericanCompany.com to view the complete North American Life Compliance Manual for more information.

CURATED ARTICLES FROM SOURCES WITH “SHARE” BUTTONS

Curating social media content is a best practice for social media content marketing. Curating content means to share articles or other content that may be of value to your particular audience. If articles are open to the public (meaning no subscription is required), and contain social media sharing icons, they are ideal for sharing on social media sites. If the content is general in nature, and does not make recommendations for specific products or investments or promote a specific sales strategy, it is permissible to use curated articles that contain sharing icons. Topics include but are not limited to:

- Healthy Living (fitness, diet, etc.)
- Money Saving (retirement, daily expenses, etc.)
- Stress Reduction & Mental Wellness
- Business Building Tips (e.g. “Why Your Business Must Have A Website”)
- Social Media Tips (e.g. how to use it for business, job searching, recruiting, etc.)
- Other Human Interest Stories (e.g. “Woman Leaves Fortune To Cat” or “Man Saves Child From Burning Building”, etc.)
- Professional Development Tips, Articles, Etc.
- Work/Life Balance Articles
- Other Articles Related To Target Audience (e.g. if you work with professional athletes, perhaps you would share content more related to their line of work or interests.)

CHARITABLE ACTIVITIES & COMMUNITY INVOLVEMENT

If you are involved in any volunteer or charitable activities, sharing those activities on social media is a great way to build your personal brand and to show that you are an active member of your community. From sponsoring little league teams to volunteering at food drives, this type of content would be permissible and require archival for post-review when necessary. If using photos of participants (especially of children), be sure to get their written permission (or the written permission of their parent or guardian) before posting.

TOPICAL STOCK PHOTOS

Stock photos can be purchased on Websites like [istockphoto.com](https://www.istockphoto.com) for a very low cost, and come with the right to use the photos for things like promotional materials—including posts on social media sites. A common practice on social media is to ask a question, and post a stock image associated with that topic, for example:

- Generic Seasonal or Holiday Messaging (e.g. “Happy Independence Day!” with fireworks photo)
- Famous Quotes (e.g. “You miss 100% of the shots you don’t take” – Wayne Gretzky”, along with a stock photo of a hockey goal)
- Questions to Prompt Engagement (e.g. “Fill in the blank: I want to retire at age ____”, with a photo of seniors having fun)

A best practice of social media marketing is to avoid making sales pitches. Instead, use social media to engage with clients or potential clients and show your personality by sharing the types of posts listed in this section. Useful articles, information about community involvement and posting stock photos with questions are generally better received by the social media community. Posts that promote products and sales concepts can turn an audience off, and they require more planning time because of the pre-approval required. When planning your social media calendar, a good rule of thumb would be to spend at least 90% of your time posting from within this category of content requiring archival only, with only 10% at most falling into the category requiring pre-approval.



North American Company
for Life and Health Insurance
Since 1886

525 W Van Buren | Chicago IL 60607

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