

## Exhibit A

### **POLICY 2415: Social Media Use**

#### **2415.1 Purpose:**

The policy outlines the protocol and procedures for use of social media to publicize District services and events. In addition, this policy addresses the responsibilities of employees and District officials with regard to social media and the use of District resources (time/equipment), as well as responsibilities related to the public records and open meeting laws.

#### **2415.2 Definitions:**

a) **Social Media:** Various forms of discussions and information-sharing, including social networks, blogs, video sharing, podcasts, wikis, message boards, and online forums. Technologies include: picture-sharing, wall-postings, fan pages, email, instant messaging and music-sharing. Examples of social media applications include but are not limited to Google and Yahoo Groups, (reference, social networking), Wikipedia (reference), MySpace (social networking), Facebook (social networking), YouTube (social networking and video sharing), Flickr, (photo sharing), Twitter (social net-working and microblogging), LinkedIn (business networking), and news media comment sharing/blogging.

b) **Social Networking:** The practice of expanding business and/or social contacts by making connections through web-based applications. This policy focuses on social networking as it relates to the Internet to promote such connections for District business and for employees, elected and appointed officials who are using this medium in the conduct of official District business.

c) **“Posts” or “postings”** means information, articles, pictures, videos, or any other form of communication posted on a District social media site.

**2415.3 Policy:** No district social media site may be created without the approval of the General Manager or his or her designee. All District social media sites created on behalf of the District, by its employees on District time, or using other District resources are the property of the District and shall be administered and regularly monitored by the General Manager or his/her designee. These social media sites shall be used only to inform the public about District business, services and events. Individual departments may not have their own pages/sites. Individual departments wishing to add content to District social media sites may submit a request to the General Manager. The District’s web site, [insert web URL], will remain the location for content regarding District business, services and events. Whenever possible, links within social media formats should direct users to the District web site for more information, forms, documents, or online services necessary to conduct business with the District. District social media sites shall clearly state that such sites are maintained by the District and that the sites comply with this Social Media Policy.

**2415.4** District employees and appointed and elected officials shall not disclose information about confidential District business on the District’s social media sites, personal social media sites, or otherwise. In addition, all use of social media sites by elected and appointed officials shall be in

compliance with California's open meeting laws, which prohibit serial meetings of a majority of the Board or another legislative body of the District via email or other electronic means. Members of the Board, committees and/or legislative bodies shall not respond to, "like", "share", retweet, or otherwise participate in any published postings, or use the platform or any form of electronic communication to respond to, blog or engage in serial meetings, or otherwise discuss, deliberate, or express opinions on any issue within the subject matter jurisdiction of the body on which they serve. Employees and elected or appointed officials' posts to non-District social media sites are a reflection of their own views and not necessarily those of the District and should not suggest otherwise.

**2415.5 Posting/Commenting Guidelines:**

- a) All postings made by the District to social media sites will contain information and content that has already been published or broadcast by the District. The District will not comment on other social media member's sites. All official social media postings by the District will be done solely on the District's social media sites or in response to postings made on the District's social media sites. Officers, employees and agents of the District representing it on District social media sites shall conduct themselves professionally and in accordance with all District policies. All District social media sites shall use authorized District contact information for account set-up, monitoring and access. Personal email accounts or phone numbers may not be used to set up, monitoring, or post to a District social media platform.
- b) The District reserves the right to remove from its social media sites content that it finds to violate this policy or applicable law. Any participants on the District's social media sites who are in continual violation of the postings/commenting guidelines may be barred from further use of the District's site. The District will only post photos for which it has copyright or the owner's permission.
- c) District social media platforms are subject to the California Public Records Act. Any content maintained on a District social media site that is related to District business, including a list of sub-scribers, posted communication, and communication submitted for posting, may be considered a public record and subject to public disclosure. All postings on District social media sites shall be sent to a District email account and maintained consistently with the Public Records Act, provided, however, that any material removed from a District social media site consistently with this policy shall be considered a preliminary draft, note or memorandum not retained by the District in the ordinary course of business and shall not constitute a public record of the District required to be retained consistently with the District's records retention schedules.
- d) Chat functions in any social media sites will not be used.
- e) Links to all social media networks to which the District belongs will be listed on the District's web-site. Interested parties wishing to interact with these sites will be directed to visit the District's web site for more information on how to participate.
- f) The District reserves the right to terminate any District social media site without notice or to temporarily or permanently suspend access to District social media as to some or all persons at any time. The District reserves the right to implement or remove any functionality of its social

media platforms, in the discretion of the General Manager or his or her designee. This includes, but is not limited to, information, articles, pictures, videos, or any other form of communication that can be posted on a District social media platform

g) District social media sites may contain content, including but not limited to, advertisements or hyperlinks over which the District has no control. The District does not endorse any hyperlink or advertisement placed on District social media sites by the social media site's owners, vendors, or partners.

h) District employees may post to District social media platforms only during working hours. After-hours or weekend postings may only be made with prior approval of the General Manager or his or her designee.

i) Any person authorized to post items on any of the District's social media platforms shall review, be familiar with, and comply with this Policy and each social media platform's terms and conditions of use.

j) Any person authorized to post items on behalf of the District to any of the District's social media platforms shall not express personal views or concerns through such postings. Instead, postings on any of the District's social media platforms on behalf of the District shall only reflect the views of the District.

k) Posts must contain information that is freely available to the public and not be confidential as defined by any District policy or state or federal law.

l) Posts may NOT contain any personal information, except for the names of persons being available for contact by the public as representatives of the District. Posts to District social media sites shall NOT contain any of the following:

- 1) Comments that are not topically related to the information commented upon;
- 2) Comments in support of, or opposition to, political campaigns, candidates or ballot measures;
- 3) Profane language or content;
- 4) Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, or status with regard to public assistance, national origin, physical or mental disability or sexual orientation, or any other category protected by federal, state, or local law;
- 5) Sexual content or links to sexual content;
- 6) Solicitations of commerce;
- 7) Conduct or encouragement of illegal activity;
- 8) Information that may tend to compromise the safety or security of the public or public systems; or
- 9) Content that violates a legal ownership interest of any other party.

**Procedures:**

**2415.6** The General Manager or his designee will be responsible for responding to comments and messages as appropriate. The District will direct users to the District's web site for more information, forms, documents or online services necessary to conduct business with the District.

**2415.7** The District may invite others to participate in its social media sites. Such invitations will be based upon the best interests of the District as determined by the General Manager or his or her designee.

**Responsibilities:**

**2415.8** It is the responsibility of employees and appointed and elected officials to understand the procedures as outlined in this policy.

**2415.9** Employees who are not designated by the General Manager to access social media sites for District business are prohibited from accessing social media sites utilizing the District computer equipment and/ or the District's web access. While at work, employees who are not granted access via District systems and computing equipment may use personal computing devices and personal web accounts to access social media sites only during non-working hours such as lunch periods and breaks. State law pro-vides that more than occasional or incidental personal use of District resources is a crime.

**2415.10** The General Manager will determine if a requested use of District social media sites or other District resources is appropriate and complies with this policy.

**2415.11** All content on District social media sites must comply with District web standards, the rules and regulation of the social media site provider, including privacy policies, and applicable law. Employee or District confidentiality shall be maintained in accordance with all applicable laws and District policies. If a question arises regarding the use or posting of confidential information on a social media site, the matter shall be referred to the General Manager. The information in question shall not be posted, or if already posted, shall be removed until an opinion is rendered by General Manager or, at his or her request, General Counsel. Notwithstanding the opinion of the District counsel, the General Manager reserves the right to restrict or remove District information from a District social media site if the General Manager concludes the info-mation does not serve the best interest of the District.

**2415.12** All social media-based services to be developed, designed, managed by or purchased from any third party source for District use requires appropriate budget authority and approval from the Board of Directors.

**2415.13** The District reserves the right to change, modify, or amend all or part of this policy at any time.

**POLICY 2420: District Web Page**

**2420.1 Policy:** It is District policy to control the content and accuracy of the information provided on the District's Web page. All information will be directed to the [position title] acting in the capacity of the District Web manager. All information posted on the District website must be consistent with the District's mission and public interest and the District's social media policy.

**2420.2 Procedure:** Any District Board Director, official or employee may request postings to the District Web page through the General Manager or his designated representative. Postings must be non-political in nature. The General Manager who shall approve, modify, or deny the request. Postings shall be submitted in Word format as an e-mail attachment unless only a hard copy is available. In either case, it is the submitter's responsibility to check the item for accuracy both prior to submission and after posting to the Web page to insure no inadvertent errors appear on the final document. The submitter shall inspect the posted submission within 24 hours of posting.

a) The General Manager or his or her designee shall submit the approved request to the [District department or vendor] for inclusion on the web page and, when necessary, to suggest alternative solutions.

b) The General Manager or his or her designee shall also manage removal of outdated postings.

### **2420.3 Privacy Policy.**

Last Updated: [date]

The following privacy policy shall be posted to the District's website under a link on the home page.

The [name of district] ("District," "we" or "us") is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. We are pleased to provide this Privacy Policy to inform you of our practices as information that we collect through this website. Please note that this Privacy Policy applies only to our online information-gathering and dissemination practices conducted in connection with this website, and does not apply to any of our practices conducted offline. If you have any questions or comments about the Privacy Policy or our privacy practices, please contact us at [contact email address].

By accessing or using this website, you agree with all the terms of this Privacy Policy, so please do not access or use this website if you do not.

We may change this Privacy Policy at any time. Please take a look at the "Updated" legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when posted to this website. By accessing or using the website after any such changes, you accept the revised Privacy Policy.

#### **Personal Information We May Collect**

We collect two types of information through this website: Personal Information and Other Information. "Personal Information" is information that identifies you or relates to you as an individual. "Other Information" is any information that does not reveal your specific identity or does not directly relate to an individual. Other Information is addressed below, under the heading "Other Information".

We may collect Personal Information through the Sites such as:

- Name
- Email address
- Mailing Address
- Preferences for electronic or physical delivery of newsletters

We may use Personal Information:

- to respond to your inquiries and fulfill your requests, such as to send you information, to register you for events, and to provide you District services.
- to keep a record of your contact information and correspondence, if you contact us through this website and to respond to you.
- to send you administrative information, including information regarding the websites and changes to our terms, conditions and policies.
- to facilitate social sharing functionality.
- for our internal business purposes, such as improving or modifying this website and operating and expanding our services.
  
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public or government authorities, including public or government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, or yours or others'; or (g) to pursue available remedies or limit the damages that we may sustain.

**How Personal Information May Be Disclosed:**

- to third-parties provide us services such as website hosting, data analysis, IT services and infrastructure, customer service, email delivery, auditing and the like.
- to a third party (whether affiliated or unaffiliated with us) upon any reorganization of the District or transfer or some of all of its services to another entity.
- by you, on message boards, blogs and other services to which you are able to post information. Please note that any information you post or disclose through these services will become public information, and may be available to visitors to this website and to the general public. We urge you to be thoughtful when disclosing your Personal Information, or any other information, on this site.
- to your friends associated with your social media account, to other website users as well as to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your use of this website. By connecting your use of this website to your social media account, you authorize us to share information with your social media account provider and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your Personal Information shared with other users or with your social media account provider, please do not connect your social media account with your use of this website and do not participate in social sharing on this website.
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public or government authorities, including public or government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, or yours or others'; or (g) to allow us to pursue available remedies or limit the damages that we may sustain.

**Other Information We May Collect:**

“Other Information” is any information that does not reveal your identity or relate to an individual, such as:

- Browser information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and Other Information you provide
- Aggregated information
- Zip codes

#### **How We May Collect Other Information:**

We and our third-party service providers may collect Other Information in a variety of ways, including:

- **Through your browser:** Most Internet browsers transmit certain information to websites that you visit, such as your computer’s type (Windows or Macintosh) and its Media Access Control (MAC) address and screen resolution, and the type and version of your computer’s Operating System and browser. We use this information to ensure this website functions properly.
- **Using cookies:** Cookies are text files, containing small amounts of information, which are downloaded to your computer, or smartphone or other device by which you visit a website. Cookies allow us to recognize your browsing device to assist with your use of this website. This can include helping us understand how this website is used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests, although we do not intentionally use them for that purpose, our service providers may.
- **If you do not want information to be collected through the use of cookies on your computer,** most browsers allow you to automatically decline the transfer of cookies to your computer or other device, or to be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. If cookies are disabled, however, some features of this website may not operate as intended. Information about procedures to disable cookies can be found on your Internet browser provider’s website.
- **Using applications:** We may use applications, including mobile applications or widgets, to collect information from you.
- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some website pages and HTML-formatted email messages to, among other things, track the actions of users of this website and email recipients, measure the success of marketing campaigns and compile statistics about use of this website and response rates.
- **IP Address:** Your “IP Address” is a number that is automatically assigned to your computer or other web-browsing device by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits this website, along with the time of visit and the page(s) visited. Collecting IP Addresses is standard practice on the Internet and many websites do it automatically. We use IP Addresses for purposes such as measuring use of this website, helping diagnose server problems and administering this website.

- **From you:** We collect information when you provide it voluntarily, such as your company, title, interests and preferred means of communication. Unless combined with Personal Information, such information does not personally identify you or any other user of this website.
- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of this website. For example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code.

**How We May Use and Disclose Other Information:** We may use and disclose Other Information for any purpose, except when applicable law requires to treat Other Information as Personal Information. In those situations, we may use and disclose Other Information for the purposes for which we use and disclose Personal Information.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your company and title). If we combine any Other Information with Personal Information, we will treat the combined information as Personal Information as long as it is so combined.

**Third Party Sites:** This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which this website contains a link. Please read the terms, conditions and policies of third-party sites before accessing or using them. The inclusion of a link on the Sites does not imply our endorsement of the linked site.

**Security:** We use reasonable organizational, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data storage system or method of Internet data transmission is perfectly secure. Please do not send sensitive or confidential information to us by email or by any other means in connection with this website. If you have reason to believe that your communications with us have been compromised in any way, please immediately notify us of the problem by contacting us as provided in the “Contact Us” page of this website.

**Choices and Access:** Your choices regarding our use of your Personal Information for marketing purposes

You may opt-out of receiving these marketing-related emails by following the unsubscribe instructions in any message we send you, by emailing us at [contact email address]. We strive to honor such request(s) as soon as reasonably practicable. How you can access, change or suppress your Personal Information:

You may request to review, correct, update, suppress or otherwise modify any Personal Information that you have previously provided to us through this website, or object to our use of such Personal Information by emailing us at [contact email address] or by other means as noted on the “Contact Us” portion of this website. You may also oppose the processing or transferring of Personal Information to the extent the laws of your country require, if you have a legitimate reason to do so.

In your request, please state what information you would like us to change, and whether you would like to have your Personal Information removed from our database or otherwise let us know what



limitations you would like to place on our use of your Personal Information. For your protection, we will only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before doing so. We strive to comply with requests as soon as reasonably practicable.

We may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain in our databases and other records. Such information will not be removed. We may, from time to time, re-contact former users of this website. Finally, we are not responsible for removing information from the databases of third parties (such as service providers) with whom we have shared your Personal Information.

**Retention Period:** We will retain your Personal Information as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

**Use of Site by Minors:** The Sites is not directed to children under the age of 13 and we request they not provide Personal Information through this website.

**Cross-Border Transfer:** Your Personal Information may be stored and processed in any country in which we engage service providers, and by using our Sites you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those in your country.

**Sensitive Information:** We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., Social Security numbers, credit card or other payment card information, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through this website or otherwise except as necessary to pay for District services.

**Contacting Us:** If you have any questions about this Privacy Policy, please contact us by email at [contact email address] or by other means as noted on the "Contact Us" portion of this website.

Please note that email communications are not secure; accordingly, please do not include credit card information or other sensitive or confidential information in your emails to us.