

**AMALGAMATED LIFE INSURANCE CO.**  
**POLICY & PROCEDURE**

**SUBJECT: INTERNET USAGE AND ELECTRONIC COMMUNICATIONS  
POLICY**

**DATE: DECEMBER 4, 2002**

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**I. Purpose**

To define Amalgamated Life's policy with regard to use, retention and disclosure of personal computers, Internet, electronic mail and all electronic communications sent or received by the company's employees (or other authorized individuals) using any technology system made available or accessible by the company. This policy and its requirements are extremely important and protect vital company assets and interests.

**II. Scope**

This policy applies to all company employees and all other authorized users of the company's equipment, electronic mail and messaging infrastructure made available by the company, including Internet, Intranet and online access provider systems. Users are responsible for complying fully with this policy as stated, but the company reserves the right to modify this policy at any time, with or without prior notification. Violations could be the basis for employee discipline and/or discharge.

**III. General Policy**

Internet, Intranet access and Electronic mail are provided to employees as business tools for appropriate internal and external business uses. The technology systems (the "System") is owned solely by the company and information in the System will be treated just like other company business records, files, electronic records, documents, materials and equipment. Prohibited uses of the Internet and e-mail are detailed in Section IV of this policy.

Users must take particular care not to disseminate confidential company information to unauthorized users. Use of the System for the communication of personal, private or confidential information is not appropriate. If incidental or occasional personal use of the System is made on the public kiosks or after hours, such use is still subject to the same policies and procedures set out in this policy.

The company reserves the right to review all company electronic records, including e-mail messages. Therefore, employees should have no personal expectation that their electronic mail messages are private. Because e-mail messages deleted by the user may still be present, either in another person's mailbox, or on a file server or backup file of a user, care must be taken to ensure the accuracy and professionalism of all e-mail communications. E-mail messages must be able to withstand scrutiny without causing embarrassment to the company, its employees or customers.

All company policies, including but not limited to policies concerning copyright, confidentiality, harassment and compliance with equal employment laws, apply to the use of all Systems (Internet, electronic mail, etc.).

#### **IV. Authorized Uses of Electronic Mail**

##### **A. Authorized Uses of Electronic Mail**

All company employees with a legitimate business purpose may use e-mail, maintaining a separate "mailbox" address for the sending and receiving of messages.

##### **B. Security and User Passwords**

1. Employees must ensure that internal messages meant only for company employees are not sent to outsiders.
2. System users should secure access to their mailboxes through the use of passwords and other security devices, and should not leave the System on and available to unauthorized users.
3. Internet, Intranet and/or online access provider services, and the company's Internet, Intranet or service provider address may be used solely for business purposes.
4. Employees may not reveal any confidential internal e-mail names and passwords of company e-mail users to anyone outside the company, including people who request such information over the telephone and seem to have a legitimate reason for asking. All such requests must be referred to the MIS department or Legal department for a response.
5. Extreme care must be taken in both configuration of the system and content of communications not to expose the company to risk of a security breach, harassment or sabotage.

##### **C. Prohibited Uses of the Internet and Electronic Systems**

These include:

- Personal or personal commercial activities.
- Sending copies of documents in violation of copyright laws or licensing agreements.
- Sending messages prohibited or restricted by government security laws or regulations.

- Sending confidential or proprietary information or data to persons not authorized to receive it, either within or outside the company.
- Content that may constitute sexual harassment or be considered discriminatory, obscene, derogatory or excessively personal, whether intended to be serious or humorous.
- Sending chain letters.
- Illegal activity.
- Harassment.
- Exchanging sensitive information related to possible or actual litigation.
- Solicitation of any type, except for company-sanctioned activities.

Employees cannot disclaim responsibility for failure to adhere to these restrictions. If you need clarification on any of these prohibited uses, contact the company's Legal department or the Human Resources department.

#### **D. Internet Blocking**

The company will be blocking certain Internet sites that are generally not appropriate for our line of business. The "blocking" of sites is a common practice within most organizations. If an employee needs to have access to sites that may otherwise be "blocked," an "Internet Access Form" may be completed. Any such requests will require the authorization of the appropriate Manager and Division Head. The signed forms will be submitted to the MIS department for access to be granted.

#### **E. Privacy/Access**

The company intends to routinely monitor the contents of electronic mail messages and/or Internet use. Therefore, users should expect that electronic mail messages and Internet usage may be accessed by authorized supervisors or MIS System Administrators without the permission of the employee. However, no other employees may monitor or access e-mail messages of another user.

Any requests for access to the contents of company systems in order to respond to legal process, such as subpoenas, or for purposes of representing the company in connection with any actual or threatened litigation, investigation or claim must be brought to the attention of the company's Legal department.

Unauthorized access of e-mail messages is a serious violation of company policy and grounds for dismissal.

#### **V. Responsibilities**

**All employees** must ensure that they have management authorization to use the System and are responsible to adhering to this policy. Employees should notify the Legal, MIS or HR departments any violations of this policy.

**Managers and Department Heads** are responsible for (a) ensuring that their employees understand this policy and for monitoring usage within their

department; (b) ensuring that access privileges are terminated when appropriate in cases of transfer, termination or changes of assignment; and (c) cooperating with and providing resources for investigations of System use and misuse.

## **VI. Disclaimers**

Please be aware of the following when using company equipment:

- E-mail messages can be misdirected by the sender or by an error in the message routing process.
- Internet and Intranet rely on public networks that are outside company control. Service levels and confidentiality cannot be guaranteed.
- Once sent, e-mail messages cannot be retrieved or removed from a recipient's mailbox.

## **VII. Employee Acknowledgement**

Every employee will receive a copy of the Internet and Electronic Communications Policy. Upon receiving the policy, each employee will be asked to sign an acknowledgement form. This acknowledgement is for the protection of both the employee and the employer.



### **AMALGAMATED LIFE INSURANCE COMPANY**

**EMPLOYEE ACKNOWLEDGEMENT:** Receipt of Internet & Electronic Communications Policy.

I acknowledge that I have received a copy of the Internet and Electronic Communications Policy for Amalgamated Life Insurance Company Staff.

I understand it is my responsibility to be familiar with and comply with the requirements of this policy.

I understand that by using equipment and technology that belong to Amalgamated Life, I am consenting to the monitoring of my use of that equipment and technology by Amalgamated Life.

I understand that the Internet address of any site that I visit and any images or documents that I print or download will be recorded and reviewed as determined necessary by Amalgamated Life.

I understand that my internal and external email communications are not private and that any messages that I send or receive are recorded and stored on Amalgamated Life's network server and will be reviewed as determined necessary by Amalgamated Life.

I understand any violation of this policy could lead to discipline, including dismissal or even criminal prosecution.

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Employee's Printed Name

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Employee's Signature

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Date