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## NortonLifeLock Influencer and Engaged Social Media Policy

The following Social Media Policy (“Policy”) applies when blogging, posting on social media, or making statements (written or verbal) about the NortonLifeLock brand, NortonLifeLock offerings or any variation thereof at the request of NortonLifeLock Inc. (“Company”), through a third-party engaged by the Company, or when the Company has provided you, directly or indirectly, with free or discounted service or any incentive for you to Blog.

### 1. Application of Policy

“Blogging” or “Blog” includes sharing any information on Company-owned websites, or third-party websites, platforms or applications, in any format or medium (e.g., Facebook, Twitter, Instagram, YouTube, Snapchat, WordPress, Tumblr, etc.). Blogging also includes making any comments (verbal or in writing) about the Company, its brands, its products and services or those of its competitors, on third-party websites, platforms or applications on in any other media (e.g., on public review websites like Yelp!, via the Amazon.com customer review feature, on television, or in a news media article).

### 2. Disclose Your Connection to The Brand You Have Been Engaged to Promote

You are responsible for complying with FTC regulations including [Federal Trade Commission 16 CFR Part 255: Guides Concerning the Use of Endorsements and Testimonials in Advertising](#), which requires, among other criteria, that material connections between advertisers and endorsers be disclosed. Whether you were directly engaged by the Company to Blog or have simply been given an incentive to review the Company’s products and services, you should make your connection to the brand you are Blogging about clear to the public. This connection should be disclosed **clearly and conspicuously**, regardless of space limitations of the medium. This means it should be easy for consumers to view and understand it when they are reading your posts. Some examples of how to disclose the connection are: writing “Norton LifeLock has asked me to talk to you about...,” using the hashtag #Ad or #NortonLifeLockPartner, or including a static “[Name of Brand] Sponsored Post” banner at the top of your Blog or post. This disclosure should not be buried in footnote or be on a separate page (e.g., a bio page) even if you include a link to that page in the Blog.

### 3. Give Your Honest and Truthful Opinions

Your statements about the Company’s products or services should always reflect your honest and truthful opinions and actual experiences. The Company expects that you refrain from making statements that may be inconsistent with the positive images and/or goodwill with which the Company wishes to associate. This would include linking to, or including content that is sexual, violent, offensive, or otherwise inappropriate for the audience for which it was intended within a Blog discussing Company’s products or services.

### 4. Only Make Factual Statements That Are Truthful and Can Be Verified



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Only make a factual statement about a product or service characteristics or quality, which you know with reasonable certainty is true and can be verified. Remember that even if you don't expressly state a fact, it may be implied, and this Policy applies to both express and implied messages. Be especially careful about making any false statement about the Company's competitors or their products and services, as the Company does not support any false or misleading statement or comparison. If you are Blogging at the Company's direct request, each Blog requires prior legal review (please check with your Company contact for full details).

### **5. Promotions, Giveaways, Contests and Other Promotions**

Do not conduct any promotions (sweepstakes, contest, free giveaway, charitable promotion, etc.) promoting Company's products or services without prior approval from Company.

### **6. Do Not Send Messages on Company's Behalf Unless Expressly Requested**

Unless expressly requested, the Company does not want you to send any emails or other messages (such as social media private messages) on its behalf, nor will it provide you any compensation if you do. To the extent that you send your own emails or messages, the Company encourages you to comply with all applicable laws. For the purpose of clarity, if you are specifically asked to send any emails or messages on the Company's behalf, this Policy shall apply and any communication about the Company or its products and services shall be considered "Blogging" for the purposes of this Policy. If you are asked by the Company to send e-mails or messages, you should disclose your connection to the Company (see Paragraph 2 above) and the Company may also require certain disclosures to be contained in the message.

### **7. Respect Intellectual Property Rights**

Intellectual property rights are a group of legal rights that protect creative works, brands or inventions. These rights include copyrights, trademarks, patents, trade secrets, as well as the right to use someone's name, likeness or voice (or "publicity rights"). Examples of works protected by intellectual property include photographs, videos, music, trademarks and logos, writings, a person's image, websites, etc.

Only use the Company's intellectual property with its express written permission, and do not alter or modify any Company intellectual property (this includes the Company's logos and trademarks). Any use you make of the Company's trademarks inures back to the Company. Only use third-party-owned intellectual property with express permission or when such use is otherwise permitted under the law (such as "fair use"). Note: a determination of "fair use" is a legal judgment and should likely only be made after consultation with Company's legal department, or your own intellectual property legal counsel, as appropriate.

### **8. Do Not Disclose Any Company Confidential Information**

If you receive or become aware of information about the Company, its products or services or its internal business operations (including financial information) that is not known by the general public or is subject to a Non-Disclosure Agreement, *do not include such information in your Blog and do not otherwise disclose it to anyone.* To



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the extent you have any question whether information is confidential in nature, either contact the Company directly before disclosing such information or otherwise err on the side of caution and do not disclose the information. Please refer all media inquiries regarding the Company or its products or services to [press@nortonlifelock.com](mailto:press@nortonlifelock.com).

### **9. You Are Personally Responsible for Your Actions**

You should know that you are personally liable under federal, state or local law for your actions and omissions with respect to your Blog and Blogging, which makes following this Policy, as well as all applicable laws, regulations, guidelines and agreements (such as website Terms of Service), particularly important. Furthermore, you should know that the Company will hold you directly responsible for any claims that arise from your violation of the law, this Policy, the Company's rights or a third-party's rights. By Blogging you hereby agree to indemnify and hold harmless the Company, its parents, affiliates and subsidiaries from any liability that arises out of the foregoing.

### **10. We Reserve the Rights to Ask You to Remove Content**

By Blogging at the direct request of the Company, or by accepting any incentive from the Company to Blog, you agree that, upon notice from the Company that it finds content objectionable, you will immediately remove such content from your Blog relating to Company, its products or its services, those of its competitors or those associated with the Company. Even if we do not notify you, we expect that you will promptly remove any content for which you receive a legitimate complaint, or which you later become aware may be violate someone's intellectual property or other rights or may be in violation of a law or regulation.

If you have any questions about this Policy, please ask your Company contact.