



***Social Media & Website Privacy Policy  
Policies and Procedures  
Tennessee Academy of Family Physicians***

# ***Social Media & Website Privacy Policy Policies and Procedures Tennessee Academy of Family Physicians***

---

Adopted 7/13/2013

Table of Contents

<b>TABLE OF CONTENTS .....</b>	<b>3</b>
<b>PUBLIC WEBSITES &amp; LEGAL NOTICES .....</b>	<b>4</b>
A. PURPOSE.....	4
B. POLICY STATEMENT .....	4
<i>i. Privacy Policy .....</i>	<i>4</i>
<i>ii. Notice of Monitoring.....</i>	<i>5</i>
<i>iii. Disclaimer of Endorsement .....</i>	<i>5</i>
<i>iv. Disclaimer of Liability.....</i>	<i>5</i>
<i>v. External Links and Social Media/3rd Party Sites .....</i>	<i>5</i>
<i>vi. Copyright Status .....</i>	<i>6</i>
<i>vii. Official Seal, Names and Symbols.....</i>	<i>6</i>
<i>viii. Proprietary Rights .....</i>	<i>6</i>
C. COMPLIANCE .....	7
D. REVIEW AND MAINTENANCE.....	7
E. REFERENCES .....	7

# Public Websites & Legal Notices

## A. Purpose

The intent of the following policy and procedures is to offer guidelines to Tennessee Academy of Family Physicians members as well as members of the general public who engage in social media activity on behalf of themselves or the Tennessee Academy of Family Physicians, and to serve as a reminder of social media best practices. It addresses topics that include social media content creation, brand consistency, personal use and legal compliance, as well as guidelines for engaging communities and contributing in a manner which best represents the values and goals of the Tennessee Academy of Family Physicians.

## B. Policy Statement

### i. Privacy Policy

1. If you visit the [www.TNAFP.org](http://www.TNAFP.org) web site to read or download information, we collect and store only the following information about you: the name of the domain from which you access the Internet; the date and time you access our site; and the Internet address of the web site from which you linked directly to our site. We do not collect or use any information subject to the Privacy Act, such as name and address.
2. We will not obtain personally identifying information about you when you visit our site unless you voluntarily choose to provide such information to us by E-mail, or other on-line form. The Tennessee Academy of Family Physicians does not give, sell or transfer personal information to third parties unless required by law, such as the Freedom of Information Act.
3. We use **GoDaddy Analytics** to generate aggregate summary data about visits to the TNAFP.org web sites to assess what information is of most interest and identify system performance or problem areas.
4. Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits.
5. You are very strongly discouraged from posting any personal information (yours or any other individual's) such as social security numbers, full names, addresses, phone numbers, or e-mail addresses to the Tennessee Academy of Family Physicians' website or social media sites. Such information is subject to deletion by the Tennessee Academy of Family Physicians.
6. As social media posting and interaction is a direct reflection on the Tennessee Academy of Family Physicians and its members, all content and interactions must be professional, polite, and live up to the high ethical standards for which we strive. Inappropriate content, or links to inappropriate content from 3<sup>rd</sup> parties includes, but is not limited to, profanity, vulgarity, content which is pornographic or offensive in nature, or which violates privacy or copyright law, is strictly prohibited. Posting of content which is deemed not in compliance with the Tennessee Academy of Family Physicians policies will result in immediate removal of access and deletion of the material.
7. Please note that courts have found individuals in violation of HIPAA laws for the dissemination and discussion of patient information even when personally identifiable information such as full names or social security numbers were removed.

## ii. **Notice of Monitoring**

The Tennessee Academy of Family Physicians does not log site entries. At a minimum, we hold the right to monitor public user postings and delete inappropriate postings or postings not relevant to our purpose.

Unauthorized attempts to upload information and/or change information on TNAFP web sites are strictly prohibited and are subject to prosecution under the Computer Fraud and Abuse Act of 1986 and 18 U.S.C. §§1001 and 1030.

## iii. **Disclaimer of Endorsement**

The Tennessee Academy of Family Physicians does not endorse any commercial product, service, process, or enterprise. Links to other web sites and references to any commercial product or enterprise are provided solely for the convenience of the user and do not constitute an endorsement or recommendation. The Tennessee Academy of Family Physicians assumes no responsibility for the content or operation of other web sites.

## iv. **Disclaimer of Liability**

The Tennessee Academy of Family Physicians makes no warranty, express or implied, including the warranties of merchantability and fitness for a particular purpose and assumes no legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process described or depicted on this web site and does not represent that its use would not infringe privately owned rights.

## v. **External Links and Social Media/3rd Party Sites**

This web site includes links to federal and non-federal external sites. Non-federal websites do not necessarily operate under the same laws, regulations, and policies as federal websites. If you click a link to an outside website, such as Facebook, Twitter, YouTube, Flickr, SlideShare, or other external site, you will leave the Tennessee Academy of Family Physicians site and are subject to the privacy and security policies of the owners/sponsors of the outside website.

- 1. Tennessee Academy of Family Physicians' Purpose in Using Social Media**  
The Tennessee Academy of Family Physicians uses 3rd party social media sites such as Facebook, Twitter, and YouTube as additional means of reaching the public and directing people to [www.TNAFP.org](http://www.TNAFP.org), which is the official web site the Tennessee Academy of Family Physicians.
- 2. The Tennessee Academy of Family Physicians **does not use, maintain, or share Personally Identifiable Information (PII) made available through social media/3rd party sites.**** You can access information published to these sites from the top navigation icons without having an account with or subscribing to these 3rd party services. If you access one of these sites without an account, no Personally Identifiable Information is exposed to the Tennessee Academy of

Family Physicians. If you subscribe to one of these services and your account name, on-line profile, or comments you make happens to reveal personally identifiable information, we will not use, maintain, or share that information outside the agency.

- 3. Please Review the Privacy Policies of these Social Media/3rd Party Sites.** You should familiarize yourself with the privacy policies of any social media site or 3rd party site you use. Some of these sites may use persistent cookies in order to improve the service they provide to their users. If you actually subscribe to these services, you may be revealing personally identifiable information to a 3rd party. Since our social media content is available to the general public, if you make a comment on a social media site, any information in your comment, as well as your profile name and any other public profile information, will be available to the general public to see.

Privacy Policies: Facebook, Twitter, YouTube, Flickr, Slideshare, and Google.

- 4. Mitigating Other Privacy Risks** - Only authorized Tennessee Academy of Family Physicians employees tasked with administering the Tennessee Academy of Family Physicians social media accounts will have access to those accounts.

## **vi. Copyright Status**

No copyright may be claimed for any work on any Tennessee Academy of Physicians websites that was created or maintained by employees in the course of their duties. Images and text appearing on this web site may be freely copied. Credit is requested. If copyrighted material appears on the site, or is reached through a link on this site, the copyright holder must be consulted before the material may be reproduced.

## **vii. Official Seal, Names and Symbols**

Federal law prohibits use of any symbol, emblem, seal, insignia or badge of any entity of the Tennessee Academy of Family Physicians or any colorable imitation of such words, initials, symbols, emblems, or seals in connection with any advertisement, solicitation, business activity, or product where such use could reasonably be interpreted as conveying the false impression that such advertisement, solicitation, business activity, or product is in any manner approved, endorsed, sponsored, or authorized by, or associated with, The Tennessee Academy Physician. See 18 U.S.C. § 701, 31 U.S.C. § 333 and 31 C.F.R. Part 37.

## **viii. Proprietary Rights**

The Tennessee Academy of Family Physicians is the only entity authorized to create and maintain public social media sites or web pages in the name of the Tennessee Academy of Family Physicians, and may delegate that right as it so chooses. Tennessee Academy of Family Physicians reserves the right to terminate access to any user who does not abide by these guidelines. As sole proprietor, the Tennessee Academy of Family Physicians or chosen representative thereof reserve the right to the following:

1. To remove from its social media or associated websites any inappropriate content, including but not limited to posts containing spam, derogatory or offensive comments, personal attacks, or information about 3<sup>rd</sup> parties protected by any applicable privacy laws.
2. To remove any social media communication that is in violation of the Tennessee Academy of Family Physicians privacy, confidentiality, and legal guidelines, or is not in compliance with PUBLIC LAW 104 - 191 - HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996.
3. To monitor dissemination of content such as documents, reports, educational material, etc. of which the Tennessee Academy of Family Physicians maintains sole proprietorship, and act in accordance with any applicable intellectual property, copyright, trademark, and other laws.
4. To take legal action if necessary to preserve its reputation and intellectual property.
5. To amend this policy at any time through posting a publicly available notice.

## C. Compliance

All responsible users must comply with the policy detailed in this privacy document. Any user found to be abusing this privilege or not in compliance with any of these policy statements, may be subject to disciplinary action.

Contact the TNAFP Executive Director for interpretations or questions regarding disciplinary actions related to violations of policy.

## D. Review and Maintenance

This document will be updated upon any material change in a timely fashion. Documentation will be reviewed, updated, and re-authorized annually pursuant with legal or regulatory requirements, industry leading practices, audit policies, or other business needs.

## E. References

- **Health Data Management**  
<http://www.healthdatamanagement.com/channels/data-security.html>
- **U.S. Department of Health and Human Services**  
<http://www.hhs.gov/ocr/privacy/index.html>
- **Special Publication 800-66 – National Institute of Standards and Technology** <http://www.nist.gov/healthcare/security/hipasecurity.cfm>