



## SOCIAL MEDIA MODERATION POLICY – INTERNET PRODUCT POSTS AND REVIEWS

- The Company refers to The Loan Company.
- This policy sets out the Company's objectives and processes in seeking to moderate content posted on its social media sites, consistent with the guidelines published by the Australian Competition & Consumer Commission.
- The Company will, as far as possible, report and/or remove from the relevant social media pages or public review websites any posts or comments which:
  - are abusive, threatening or harassing – including swear words or personal threats or attacks (i.e. negative comments which target particular staff by name or description);
  - are intolerant – that is, vilify, or reflect intolerant comments about other people's race, culture, beliefs, physical or mental conditions, gender, religion or age;
  - are inappropriate or patently offensive – including posts depicting nudity, hate speech or violence;
  - are fraudulent, false or misleading – including fake reviews (i.e. reviews by people who have not had any dealings with the Company), reviews which contain objectively incorrect or misleading factual assertion, or which are written by people affiliated with employees of the Company where these affiliations are not disclosed in the same post;
  - contain advertising – including viral advertising, links, promotions or similar advertisements, although product recommendations or comparisons with other products or brands are acceptable if relevant to the context of the post;
  - are spam or otherwise irrelevant; or
  - otherwise violate the relevant social media standards of the host site (such as Facebook's Community Standards: see <https://www.facebook.com/communitystandards> or the Company's Privacy Policy: see <https://theloanco.com.au/privacy.html>).
- The Company may block the social media accounts of those social media users (Users) that post comments of the above nature in a persistent or extreme manner, to avoid any future posts of a similar nature.
- The Company may contact Users who have had negative experiences with the Company, as reflected in the comments and/or posts on social media, and attempt to take such reasonable steps it considers appropriate to resolve or address the concerns raised in the relevant posts. The Company may also respond to those Users who post positive reviews. This contact will either be through the relevant forum (e.g. Facebook) and/or directly by way of telephone or email.
- In contacting any Users to discuss their experiences, the Company may either contact the User through the public forum of the host site, or where the discussion is of a sensitive nature (whether in relation to positive or negative reviews or other), including the request for personal contact details, the contact will be through private forums (such as Facebook's private messaging tool) or via phone or email.



- The Company may remove or report clearly false, misleading or fraudulent reviews, and/or block the relevant User, even where the Company is continuing to discuss the relevant post with the User outside of the social media forum. The Company will only do so where it considers the content is objectively false and misleading or fraudulent (but it will not remove negative reviews where the reviews appear to reflect the genuine experiences of the poster).
- The Company will use reasonable endeavours to respond to public posts and/or private messages as soon as practicable where they, in the Company's assessment, include a legitimate request for a response and relate to matters that the Company has not otherwise already dealt with. The Company may also respond to posts which it considers otherwise warrant a response. The Company appreciates the patience of Users outside of the Company's business hours (Mon-Fri 8:30am-5:00pm).