

Social Media Policy

Introduction

This Social Media Policy outlines how employees, contractors, and affiliates of Gattaca PLC (“Gattaca”, “Matchtech”, “Infosec People”, “Gattaca Projects” or “the Company”) should conduct themselves on social media to protect the Company’s reputation, ensure compliance with legal and regulatory requirements, and prevent conflicts of interest.

The policy applies to all forms of social media, including but not limited to LinkedIn, Facebook, Instagram, X (Twitter), TikTok, YouTube, blogs, forums, and messaging platforms used for public communication.

This policy applies to: all employees (permanent, fixed-term, casual, and temporary), contractors, consultants, and agency workers representing the Company, and; anyone posting on behalf of the Company or referencing the Company, or its brand, in a professional capacity

It covers both professional and personal use of social media when that use may affect the Company.

Professional Use of Social Media

Official Company Accounts

Only authorised employees may post from official Company social media channels. Those authorised users must ensure they:

- Follow brand, tone, and communication guidelines.
- Use only approved content and assets.
- Escalate reputational or crisis-related matters to senior leaders immediately.

Work-Related Activity on Personal Accounts

In general, all Employees have the approval to use their LinkedIn profile for work related activity. For other personal social accounts, Employees may use these personal accounts for work-related posts **only with prior approval** from their line manager or the Marketing Director team.

All work-related posts must:

- Be professional and accurate.
- Use correct branding and up-to-date information.

- Make clear when opinions are personal (e.g., “Views are my own”).
- Refrain from implying official Company representation unless authorised.

In addition, because the Company operates in the recruitment and talent solutions sector, employees must:

- Represent candidates and clients respectfully and confidentially.
- Avoid making public claims about placements, candidate status, or client organisations without written permission.
- Follow data protection rules for any candidate information shared online.

Personal Use of Social Media

The Company respects employees’ rights to personal social media use outside the workplace. However, posts that could harm the Company or create conflicts of interest are prohibited.

Employees must **not**:

- Disclose confidential, proprietary, or sensitive Company information.
- Share anything that could damage the Company’s reputation.
- Engage in harassment, discrimination, or defamatory statements.
- Present personal opinions as Company views.
- Use Company branding, logos, imagery, or intellectual property without permission.
- Speak to the media or public on behalf of the Company unless authorised.

Employees must ensure privacy settings are appropriate for the type of content being shared.

Conflict of Interest

Employees must avoid situations where social media activity conflicts with the interests of the Company or its brands. This includes:

- Promoting or advertising competing recruitment businesses.
- Posting content that could bias or influence Company business decisions.
- Approaching candidates or clients for non-Company work.
- Posting or endorsing job opportunities outside of Company without approval.

Any external work or affiliate activity that involves social media promotion must be declared and approved under the Company’s conflict-of-interest procedures.

Confidentiality & Data Protection

Employees must comply with the Company’s confidentiality obligations and relevant data protection legislation (e.g., UK GDPR), under the Company’s Data Protection Policy. Employees must not publish:

- Client names, discussions, or commercial information.
- Candidate identities, CV details, or personal data.
- Internal processes, strategies, forecasts, or reports.

- Non-public financial information.
- Internal communications or images of the workplace without permission.

Respectful and Professional Conduct

Employees must ensure social media activity does not:

- Bully, harass, or insult colleagues, contractors, clients, or candidates.
- Include discriminatory remarks based on protected characteristics.
- Harm workplace relationships or the Company's professional standing.

Use of Social Media During Working Hours

Social media may be accessed during working hours only where:

- It is required for the employee's role, **or**
- It is used responsibly and does not interfere with productivity.

Employees must not use personal devices to circumvent Company monitoring, security, or compliance systems.

Monitoring and Compliance

The Company reserves the right to:

- Monitor publicly accessible social media activity.
- Investigate potential breaches of this policy.
- Remove or request removal of inappropriate or damaging content.
- Take disciplinary action, up to and including termination of employment, for serious violations.

Private accounts will not be accessed unless required by law or with the employee's explicit permission during an investigation.

Reporting Concerns

Employees should report suspected breaches of this policy to, either one of the following, their line manager, the People team, the Marketing team, or via the Speak Up policy (for serious or confidential matters).

All reports will be handled sensitively and in accordance with Company policies.

Review and Updates

This policy will be reviewed annually or whenever significant changes in legislation, technology, or Company operations occur.

Linked Documents

- Speak Up Policy.
- Consequence Management Procedure.
- Code of Conduct.
- Data Protection Policy.

Governance

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