

**Subjects:** Surveillance (extensive)

**Occupation:** Manager

**Data type:** Pictures, Private

## How to manage my organization's presence on social networks?

Convinced that social networks are now essential for its communication, a company / public institution created an account on all existing social networks.

They were in possession of pictures of their employees, which they had put up on their intranet with their agreement. They also thought it would be a good idea to post these on their social network pages.

An employee discovered the existence of the company's' social network account with his photo! He was astounded as it revealed his professional life as well. This was not the first time that he was dissatisfied with his employer and decided to tell him his exact thoughts through these social networks and published scathing comments about him.

One thing led to another, and the management of human resources took up the matter. At a meeting between the data subject and head of human resources and communication, it was agreed that the publication of the identity and pictures of the staff was tactless to say the least, as well as the use of social network to express his disagreement.

The company / public institution agreed that they failed to establish a communication strategy, including in particular the guidelines for internal use, as well as consultation with the staff concerned. The identity and pictures of all personnel were removed, as well as the comments.

### Recommendations

The company / institution that is present on a social network must first develop a communication strategy to obtain the agreement of their employees and lay down clear guidelines for the publishing of employees identities on social networks.

### Basic principles

[LPD 4, 7, 13, 18a](#); [LIPAD 38](#)

Principle of legality, transparency and purpose of the collection, proportionality

### Resources

An article by Carole Aubert, "social networks: challenges and risks for businesses," published in Plädoyer

Advice from the lawyer Pascal Rytz "remove my photo from Facebook", published on the website:

[www.solutionsavocats.ch](http://www.solutionsavocats.ch)