



WEBSITE POLICY

Effective March 2016

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1. INTRODUCTION

This policy is for the Bank's internal use to monitor, enhance and update of the Bank's website.

A website is primarily a marketing tool. It can be used to sell businesses, products or disseminate information to targeted audiences.

Generally, a website will contribute to businesses through:

- providing information that supports the sales team;
- informing the target audience of new initiatives or events;
- reaching international prospects;
- acting as distribution channel for products and services; and
- facilitating online transactions and activities such as access to money for purchase of goods and services.

Websites are created using a programming language called HTML. Each web page is saved as a file, linked together by the use of hyperlinks into a website. Once a website has been created, it is sent or "uploaded" to an ISP (Internet Service Provider), then registered under various search engines to be seen by anyone through the www – World Wide Web connected to the internet.

It allows businesses to put our products and services in front of a worldwide audience. It also can help businesses generate new revenue, cut costs and build better relationships with both our customers and suppliers.

Remember:

- each web page creates an instant impression of the organization; and
- a 'build it and they will come' approach will not work on the web. You must actively market your website (Refer Section 8 Making the Site Successful)

2. WHY BUILD A TDB WEBSITE?

The TDB website aims to provide or facilitate the following:

- (a) Promote the Bank's products and services inexpensively to the growing online community via the world-wide web by:
 - ❖ *providing TDB clients with up-to-date news about the Bank's services, product launches and special offers (ie – online version of product profiles);*
 - ❖ *providing a forum for TDB Clients and Suppliers' feedback;*
 - ❖ *providing detailed information in relation to TDB products or services as the cost of publishing extra material is minimal;*
 - ❖ *providing on-line forms such as for loan applications, credit checks or job applications;*
 - ❖ *allowing the Bank to reach potential clients within Tonga or abroad; and*
 - ❖ *providing online Banking activities to its customers.*
- (b) Advertise job opportunities at TDB and information services:

- ❖ *job vacancies can be easily published, particularly for senior positions;*
 - ❖ *application forms can be downloaded from the Bank's website; and*
 - ❖ *detailed directions and guidelines can be provided about completing various forms.*
- (c) Way of keeping in touch with TDB travelling employees:
- ❖ *TDB travelling employees can communicate with H/O via the Bank's site or vice versa.*
- (d) Possibility of allowing trusted customers and/or business partners to access by password to 'live' and/or protected information;
- ❖ *another way of classifying information available to selected clients is to password protect a portion of the site, where only authorised visitors can be given a password to access that portion of the site.*
- (e) Provide learning experience to the IT Development staff:
- ❖ *developing the site requires specialist knowledge on the type of computer language needed to build the site. This can be gained by self research, learning on the job, or provision of appropriate capacity building opportunities for the IT Programmer; and*
 - ❖ *knowledge gained in developing the site will be utilised to maintain and enhance the Bank's Intranet.*
- (f) Keep abreast of the trends in technology:
- ❖ *The website is one of the Internet applications and the Internet is the technology for the future. Therefore this is one aspect of keeping up to date with trends in technology; and*
 - ❖ *Ultradata offers some online applications with Ultracs, which the Bank may utilize in the future. However, with building of the site, the Bank's IT staff will already be exposed to Ultracs.*
- (g) Provide marketing & promotion for the Bank's highly valued clients: and
- (h) Provide a gateway to other Online Banking services such as Internet and Mobile Banking.

However, to achieve the above, all information on the website must be:

- *updated on an ongoing basis;*
- *accurately presented; and*
- *simple and easy to understand*

3. DOMAIN NAME

The domain name or web address is the unique name identifier of a website. The address is to be registered under an Internet Service Provider or another hosting company.

TDB's domain name is currently hosted by the Tonic Corporation based in Hawaii. Tonic Corporation (billing@tonic.to or lyons@tonic.to) is responsible for the payment and issuing of the < .to > domain name, and its renewal. Costs and length of renewal varies from:

- US\$50 per year for 1 year;
- US\$50 per year for 2 years;
- US\$45 per year for 3 years;
- US\$40 per year for 5 years;
- US\$35 per year for 10 years;
- US\$30 per year for 25 years; to
- US\$25 per year for 100 years.

Payment for the TDB domain name is for the period ending August 2016. Therefore the TDB domain name must be renewed no later than June 2016.

Listed below are important features to note about the Bank's domain name:

- (a) the domain name must always be <..... tdb.to> unless a change is authorized or directed by the CEO;
- (b) renewal of registration must be for a term of **five years** through the payment of the relevant fees indicated above;
- (c) payment must be made under Telegraphic Transfer to the Tonic Corporation's ANZ Account, but Bank personnel must always check with Tonic Corporation first before confirming payment;
- (d) approval for payment be under normal procedures and must be noted by the Web Master;
- (e) while Tonic Corporation is responsible for the Bank's domain name, the new website has been re-designed, hosted and managed by **Vermilian Pty Ltd**. The site went online or into the www. on December 16, 2015;
- (f) there is a maintenance & support agreement with Vermilian Pty Ltd. However, at the same time the Bank's IT staff is able to update the site remotely by uploading authorized information.

In 2014, Vermilian Pty Ltd became a subsidiary of Ultradata Australia Pty Ltd. The company is a secure digital agency specialising in banking technology and marketing. Vermilian Pty Ltd is an online channel partner for Ultradata clients, therefore blending innovative banking technology with marketing.

4. MAKE THE SITE SIMPLE

The following tips will allow the Bank to keep the website simple:

- ❖ keep the site uncluttered, for clarity with short downloading times;
- ❖ as a general rule, consider having not more than 250 words of text on a page;
- ❖ always offer a text-only alternative, as complex graphics take up more space with slow access;
- ❖ consider keeping the page size below 20kb to avoid making visitors wait;
- ❖ do not display visitor numbers on the page;

- ❖ complex animation, video, sound and large scale interactive exercises are often just attention-grabbers. Only use them if they add something specific and relevant. Visitors may not have the hardware and software needed to enjoy animations or videos.

5. WEBSITE MANAGER

The website manager controls how the site is updated and follows policy guidelines to make sure the site runs smoothly. The website manager is also responsible for determining how other employees will be involved.

The following TDB staff will be responsible for the core operation of the site:

- (a) Website Manager & Designer – MIT cooperate with the Executives; and
- (b) Website Programmer – IT Programmer & System Administrator.

The core staff members will be responsible for:

- allowing specific authorised employees to update the site;
- ensuring that there is no infringement with other people's intellectual property;
- ensuring that all employees understand their responsibilities for the maintenance of the website;
- ensuring that there is ongoing follow-up with employees responsible for updating website materials, which will be part of the PDR performance review; and
- facilitating awareness by employees of the type of information that is loaded on the site.

6. PROCEDURES FOR WEBSITE UPDATES

Ongoing updates and enhancements to the website are extremely important. Changes to the content of pages must be approved by the Web Master with the prior consent of the CEO. The Manager IT will be the Web Master, with the assistance of the System Administrator and Programmer who will be given appropriate access to update the Web Master.

The following procedures should be followed when updating the website:

- (a) All changes must be made locally through the Internet then uploaded to the host, Vermilian, in Australia. There may be changes which will require assistance of Vermilian staff and which Bank IT staff may liaise with them. However, this assistance will be subject to charges.
- (b) The site be updated immediately when changes occur.
- (c) A Log Sheet will be maintained to record changes made to the website. A person who prepares, checks, approves or signs off changes must sign the Log Sheet.
- (d) All users are responsible for keeping pages that affect them up to date.
- (e) For each document that is published on the website, ensure that the date created and date due for review is shown on the document.
- (f) Make sure that all changes are integrated with the Bank's traditional marketing activities.
- (g) Initiate website visitors to be able to do something tangible on the site. Rather than just allowing users to visit and view the site – provide discussion, forum or survey questionnaires for users to fill out.

- (h) Before uploading any changes to the TDB web server, a printed copy of the (old) current page(s) as well as the new page(s) should be filed with the Log maintained in (d) above. This will allow for comparisons to be made between the old and new page(s) when changes are published.
- (i) Consider including agency services and marketing of TDB Managed Fund products on the website.

7. NAVIGATION THROUGH THE www@tdb.to SITE

Visitors to the TDB site should be able to navigate it fairly quickly. Potential clients could be lost if navigating the site is slow as visitors may feel they are wasting their time and quickly lose patience. It only takes a second to click away to a site that is more rewarding.

Quick access to required information is the ultimate goal and visitors should not get lost on TDB site.

The following basic rules should be followed to ensure that navigating the TDB site is simple:

- (a) visitors should be allowed to navigate straight to the areas that interest them;
- (b) index, drop down menu/bar or sets of navigation buttons on the home page should be easy to handle;
- (c) a site map should be in place;
- (d) navigation links to the main areas of the site from every page should be included;
- (e) text links as well as image links for browsing should be used;
- (f) much of the traffic on some sites come in via the back door and does not begin at the home page, so be careful; and
- (g) email reply links should be included on every page, since replies are potential customers saying "Yes."

8. MAKING THE www@tdb.to SITE SUCCESSFUL

The site should be simple with a clear design which delivers what TDB customers are hoping to find.

The following basic rules will ensure that the site is effective:

- (a) Establish a "News Section" - grab visitors' attention by displaying news that affect the Bank or its customers. Publish offers on the first or home page.
- (b) Make visitors feel involved by asking for their opinions and respective interests.
- (c) Make sure that the site is efficient, attractive and free from design faults and spelling errors.
- (d) Register the site with search engines such as Yahoo, Altavista etc – the starting points for keyword-based information searches – so people can find it easily.
- (e) Check that keywords and summary information (meta tags) used by search engines are on every page.
- (f) Re-register every quarter since search engines are weighted in favour of newer registrations.
- (g) Negotiate to exchange links with relevant organisations – ask for a link to www@tdb.to on their site and allow advertisement of TDB customer product and services.
- (h) Publish the site address on all TDB letter heads, b/cards, flyers, banners, advertisements, etc.
- (i) Ensure that information on the website is easy to find – a user should never be more than three clicks away from required information.

- (j) Keep technical terms and jargon as simple as possible.
- (k) Provide TDB's clients with a choice of contact mechanisms to get in touch – phone, email , or fax.
- (l) Pictures should be relevant and regularly updated to maintain the site's appeal.
- (m) Consider publishing a scrolling message stating that "TDB is the only Bank in all main Islands."
- (n) Provide a link to Facebook page users.

9. TEST MATERIALS BEFORE UPLOADING TO SITE

The following basic procedures should be followed before uploading information on the site:

- (a) All information to be uploaded on the site should be checked for:
 - correct facts and spelling;
 - include a disclaimer if in doubt about the use visitor's might make of information given in the site;
 - contents for possible defamation – information on the Bank's site can potentially be seen anywhere in the world; and
 - check that the Bank has the right to use all design elements, programming and pictures that form part of the Bank's site.
- (b) The site should not be launched until everything works:
 - check that it looks right on the screen;
 - ask colleagues to take a look as well and escalate feedback;
 - view the site at various screen resolutions;
 - view the site on all browsers – Firefox, Chrome, and Explorer;
 - check all internal and external links work; and
 - check printing on every page that the content is still readable.

10. INTERNET SERVICE PROVIDER - ISP

- (a) Tonga Communication Commission (TCC) is and has been the Internet Service Provider (ISP) for the Bank which acts as the gateway to the web host Vermillion, providing the link between the TDB computer system and the website host.
- (b) The IT division will ensure the Bank is getting the quality services and optimum pricing from the ISP.

11. DEFAMATION

It is important to consider the impact that the Bank's site might have on the internet. A single comment on the Bank's web page could be read by numerous visitors in Tonga and around the world.

Accordingly, the utmost care should be taken to ensure that nothing is displayed on the Bank's website which might be damaging or considered defamatory to a party to whom the claim relates.

12. INTELLECTUAL PROPERTY AND COPYRIGHT

Material on the internet is protected by copyright and intellectual property laws. To this end, the Bank must publish that users of the Bank's site have limited rights to access copyright material on the site and that they may not copy the material for any purpose inconsistent with the ordinary use of the site.

The following basic procedures should be followed:

- (a) publish a copyright notice on the Bank's website, where appropriate;
- (b) state any trademarks that are to be used;
- (c) do not use images, text, video, music etc. that are protected by someone else's copyright without permission;
- (d) do not use someone else's trademarks without permission; and
- (e) linking to other websites can be a breach of copyright. Making other web pages appear to be part of the Bank's site or modifying the appearance of other web pages is generally not permitted. The safest course is to always ask permission from a website owner before linking to it.

13. CONTRACT

Information on the Bank's website could have contractual implications for visitors to the site. That is the information on the Bank's website can form part of a contract.

Therefore the following terms and conditions should be published clearly and/or the Bank should be aware of the following:

- (a) published rates such as the interest rate should be accurate and regularly updated;
- (b) figures that are published on the website should be checked regularly and updated; and
- (c) TDB must be fully aware of its obligations if the website makes a direct offer, which is accepted by a visitor.

In order to ensure the above, TDB must be clear in it's agreement with the following bodies for the design, management and hosting of the website:

- Tonic Corporation (Hawaii) – Domain name <tdb.to>
- Vermilian Pty Ltd (Sydney) – Website development and hosted
- Geotrust Pty Ltd – SSL supplier and management

14. TERMS AND CONDITIONS

In addition to the terms and conditions published on the website, the following statement should be published:

"Welcome to the Tonga Development Bank website. If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy and other policies govern Tonga Development Bank's relationship with you in relation to this website.

In this website, the term Tonga Development Bank is shortened to "TDB" or "the Bank" or "us" or "we." These terms refer to the owner of the website – the Tonga Development Bank – which is a Tongan

registered bank located at Fatafehi Road, Nuku'alofa, Tonga. The term “you” refers to the user or viewer of our website.

The use of this website is subject to the following terms of use:

- The content of the pages of this website is for general information and use only. It is subject to change without notice.
- This website uses cookies to monitor browsing preferences. If your computer allow cookies to be used, the following personal information may be stored by us for use by Third Parties:
 - The name of the [server](#) (Domain) the cookie was sent from
 - The lifetime of the cookie
 - A value - usually a randomly generated unique number
- Neither we nor any Third Party provides any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of information and materials found or offered on this website for any particular purpose. By using our site, you acknowledge that such information and materials may contain inaccuracies or errors, and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Use of any information or materials on this website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through this website meets your specific requirements.
- This website contains material which is owned by, or licensed to the TDB. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.
- All trademarks reproduced in this website which are not the property of, or licensed to, the owner are acknowledged on the website.
- Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.
- From time to time this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s)."

15. SECURITY

Matters outlined here are in addition to the **Online Bank Security Policy** posted on the website.

Unauthorized access to the TDB website must prevented. Unauthorized visitors should only be able to access pages intended for public view.

For increased security of the website, the following basic rules should be followed:

- (a) create a secure section of the site accessed by password, for restricted or subscription-only information;
- (b) Install Anti-Virus software and update regularly to safeguard the system
- (c) install a Firewall to filter unauthorized access and spam;
- (d) install SSL on top of TDB firewall and also on the website host – Vermilian; and
- (e) IT is responsible for ensuring our SSL Certificate is installed correctly. It is important that we follow the instructions that are included with the Bank's device or server.

Firewalls

The TDB website and Internet Banking service is protected by sophisticated firewalls which maintain the secure perimeters between the websites and the Internet. This provides full firewall protection that conceals the architecture of the internal networks from the outside world including protection against attacks.

SSL – Encryption

Whenever someone uses our Internet Banking service or submits information to us by using one of the main online forms available on our website, the user's information is protected by banking industry standard 2048-bit SSL (Secure Socket Layer) encryption. Encryption is a process of scrambling information using random mathematical algorithms, to ensure that only TDB receives this information in an understandable format. SSL is a protocol supplied by Geotrusts of Australia. Security is provided in two different ways:

- authenticating the web server to the client using a digital certificate; and
- encrypting all information sent.

A user can identify whether the Internet Banking session is secure or encrypted by looking for a **padlock** in the top left corner of the browser window. Clicking on the padlock will also provide a user with details on the Security Certificate pertaining to the encrypted session. More of this is covered in the Online Security Policy.

For a 3 year wildcard certificate, the price is currently \$2,376 for the SSL, plus the standard \$200/hr for 2 hours of implementation effort from the Geotrust team.

16. Policy Review

The Website Policy is to be reviewed every year in February by the Manager IT with the approval of the CFO/CEO. Revisions to the Policy must be reported to the Board of Directors annually.

ANNEX A

TONGA DEVELOPMENT BANK

Website & Intranet Update Form

TO: _____ (Departmental Head)

FROM: M/IT (Website & Intranet Manager)

DATE:/...../ 20.....

Please note that the document listed below or attached is due to be reviewed on/...../ in relation to our (Website / Intranet).

You are requested to review and return to by/...../ 20..... for appropriate action.

1.
2.
3.
4.

Further Comments:

IT ONLY

Received: _____ Date: ____/____/20____

Action: _____ Date: ____/____/20____

Uploaded: _____ Date: ____/____/20____

Checked: _____ Date: ____/____/20____