UNIVERSITY POLICY

INFORMATION TECHNOLOGY POLICIES

Number: 506
Subject: Data Classification Policy
Covered Individuals: All Employees
Covered Campus Locations: All Locations
Effective Date: October 14, 2020
Date of Latest Revision:

PURPOSE

The purpose of this policy is to establish a framework for classifying institutional data based on its level of sensitivity, value, and importance to Upper Iowa University (University or UIU). Classification of data will aid in determining baseline security controls for the protection of data. This policy applies to all institutional data.

DEFINITIONS

Confidential Information – information that would likely cause serious harm to individuals or the University if disclosed. This data requires the highest level of protection required by law, regulation, policy, agreement, or risk to the University. This data includes, but is not limited to:

- Credit card numbers
- Bank Account/Routing Numbers
- Social security numbers
- HIPAA
- FERPA
- GDPR and other data privacy laws
- Student or employee financial information

Data Classification – the classification of data based on its level of sensitivity and the impact on the University should that data be disclosed, altered, or destroyed without authorization. The classification of data helps determine what baseline security controls are appropriate for safeguarding that data. All institutional data should be classified into one of three sensitivity levels, or classifications: confidential, internal, or public. The definitions of all three levels are included here.

Data Custodian – person or area responsible for safeguarding data according to appropriate guidelines

Data Steward – person or area responsible for the respective data

Institutional Data – all data owned or licensed by the University

Internal Information – information that may cause risk to individuals or to the University, if disclosed. Internal information must be guarded due to proprietary, ethical, or privacy considerations, and must be protected from unauthorized access, modification, transmission, storage or other use. This classification applies even though there may not be a civil statute requiring this protection. This information is restricted to members of the University community who have a legitimate purpose for accessing such data. Internal information includes, but is not limited to:

- UIU ID number
- University financial information, including budget reports, internal memos, or other business related data
- Student information
- Employment or personnel data
- Departmental operating procedures
- Performance evaluations

Public Information – information available on UIU websites and publications. Public information may or must be available to the public and is defined as information with no existing local, national or international legal restrictions on access or usage. Public information includes, but is not limited to:

- Directory information
- Course title/code/location
- Schedules of classes
- Press releases
- Interactive University maps, newsletters, newspapers and magazines
- Announcements, advertisements, and freely available data on University websites

POLICY

Data processed, received, sent, or maintained by the University is classified into the following three categories:

1. Confidential
2. Internal
3. Public

Departments should carefully evaluate the appropriate data classification category for their information. It is the responsibility of every University employee to safeguard all respective data.

When provided in this policy, examples are illustrative only, and serve as identification of implementation practices rather than specific requirements.

RULES, PROCEDURES, GUIDELINES, FORMS, AND OTHER RELATED RESOURCES

ITS SOP 122 Data Classification procedure

CONTACTS

Acting as the Policy Owner, the Department of Information Technology Services is responsible for answering questions regarding the application of this policy.

SANCTIONS

N/A

HISTORY

September, 2020 – Policy developed by Information Technology Services

September 28, 2020 – Policy recommended by the University Policy Committee

October 14, 2020 – Policy approved by the President’s Council and the President