

# Data Classification Policy

## Purpose and Scope

Bentley University's data and information systems are critical to Bentley University operations and must be protected based on risk and legal requirements. This Data Classification Policy defines risk classification levels and minimum protection requirements. Complying with these requirements will protect Bentley's data from unauthorized access, modification, disclosure, transmission, destruction, or breach of applicable laws and regulations. Business and data owners must protect university data regardless of the environment, sponsor, and/or media.

## Compliance

Bentley University's Chief Information Officer (CIO) maintains authority over and enforcement of the Data Classification Policy and related policies. The Deputy CIO and the Chief Information Security Officer support policy compliance. Bentley University reserves the right to change this and other university policies periodically and will provide written notice of substantive changes.

Exceptions to this policy should be submitted to the [cybersecurity@bentley.edu](mailto:cybersecurity@bentley.edu) mailbox.

## Data Classification Definitions and Levels

### All university data are classified based on risk

Data classification, in the context of information security, is the classification of data based on sensitivity levels and the impact to the university should that data be disclosed, altered or destroyed without authorization. The classification of data helps determine appropriate baseline security controls for safeguarding that data. All institutional data should be classified into one of three sensitivity levels, or classifications, as follows:

**Level 1 – Highly Confidential:** Data are classified as Level 1 / Highly Confidential when the unauthorized disclosure, alteration or destruction of that data could cause a significant level of risk to the university or its affiliates (e.g. data breach, identity theft, fraud, systems failure, loss of business opportunities or competitive advantage, etc.). Data protected by law or contract, or data deemed by Bentley University leadership as highly sensitive are examples of Level 1 data. Level 1 data require the greatest level of data privacy and security controls.

**Level 2 – Bentley Confidential:** Data should be classified as Level 2 / Bentley Confidential when the unauthorized disclosure, alteration or destruction of that data could result in a moderate level of risk to the university or its affiliates. Level 2 data require that a reasonable level of security controls be in place. By default, all university data that is not explicitly classified as Level 1 or Level 3 data should be treated as Level 2 data.

**Level 3 – Public:** Data classified as Level 3 / Public have no expectation of privacy or confidentiality. There is minimal or no risk if data are exposed, compromised, altered or destroyed. This data may be disclosed to any individual or entity inside or outside of the university.

## Examples of Data Types

| Data Classification Type   | Types of Data  | Application Examples   |
|--|--|--|
| <b>Level 1 / Highly Confidential</b><br><br>High Risk and Strong Security Controls | <ul style="list-style-type: none"> <li>Personally Identifiable Information (PII) including first and last name in conjunction with any of the following:               <ul style="list-style-type: none"> <li>PINs; passwords; biometric data</li> <li>Social Security Number (SSN); Passport number</li> <li>Driver's license number; state-issued ID card number</li> <li>Financial account numbers; access codes</li> <li>Payment card; Cardholder Data (CHD)</li> </ul> </li> <li>Data source / backups</li> <li>Systems / Security Data – e.g. passwords; database; cryptography keys; unredacted network or systems diagrams; vulnerabilities, etc.</li> <li>Protected Health Information (PHI)               <ul style="list-style-type: none"> <li>Patient billing; medical records; family health/history</li> <li>Information about physical or psychological state of health</li> <li>Disease, medical history/treatment, drugs, genetic test results</li> </ul> </li> <li>Student data, including judicial/disciplinary information; Student's permanent record, Transcripts, and/or grade reports</li> <li>Alumni data including last name, first name with any of the following:               <ul style="list-style-type: none"> <li>Telephone/fax numbers, email, and employment information</li> <li>Family information (spouse, partner, guardian, children, grandchildren)</li> <li>Donation amount and assets</li> </ul> </li> <li>Strategic data</li> <li>Board of Trustees (BoT) records               <ul style="list-style-type: none"> <li>Meeting Minutes</li> <li>Board of Trustees votes</li> <li>Confidential information communicated at BoT meetings and/or shared with board members</li> </ul> </li> <li>Research data containing personally identifiable information from internal and external sources</li> </ul> | Enterprise Resource Planning (ERP tool)<br><br>Campus Police Safety<br><br>Health Services<br><br>Counseling<br><br>Financial Aid<br><br>Security tools<br><br>Data warehouse<br><br>Document image management system<br><br>Study abroad<br><br>Research data containing personally identifiable confidential information |
| <b>Level 2 / Bentley Confidential</b><br><br>Moderate Risk and Reasonable Controls | <ul style="list-style-type: none"> <li>Bentley private or proprietary research:               <ul style="list-style-type: none"> <li>Anonymous data collected by researchers through interviews, surveys and other methods</li> <li>Research data protected through vendor agreements</li> </ul> </li> <li>Business intelligence</li> <li>File share servers and/or storage</li> <li>Employee (Faculty and Staff) and Student Records, eg.:               <ul style="list-style-type: none"> <li>Bentley University number; visa numbers</li> <li>Personnel records, salary data, performance reviews, benefits</li> <li>Date of birth, place of birth, mother's maiden name</li> <li>Promotion and tenure files (e.g. tenure decision notes)</li> <li>Race, ethnicity, nationality, and/or gender</li> <li>Background information including:                   <ul style="list-style-type: none"> <li>Credit/criminal background checks; convictions</li> <li>Private directory/contact information</li> </ul> </li> </ul> </li> </ul>  | Course Evaluation<br><br>Student Record Management<br><br>Facilities<br><br>Institutional Research<br><br>Identity Management<br><br>Research Data: HCUP and anonymized health data  |

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|---|---|--|
| <b>Level 3 / Public</b><br><br>Low Risk and No Expectation of Privacy or Security | <ul style="list-style-type: none"> <li>• Public directory information (unless otherwise restricted)</li> <li>• Any content or image on the university's public web sites</li> <li>• Publicly released press statements</li> <li>• University course catalog</li> <li>• Job postings</li> <li>• Campus map</li> <li>• Public research sources</li> </ul> | Marketing materials<br><br>Press Releases<br><br>Bentley.edu web pages<br><br>Bentley Social Media<br><br>Bureau of Labor Statistics Tables<br>US Census Surveys |
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## Policy Requirements

The highest level of security controls must be applied to Level 1 / Highly Confidential data, and a reasonable level of security controls for Level 2 data. Level 3 / Public data has no explicit privacy or security requirements. Data in either electronic or physical (e.g. paper) format shall be destroyed in accordance with the University's Record Retention and Destruction Policy.

The required minimum data protection standards are listed below:

## Minimum Data Protection Standards

| Minimum Protection Requirements   | Level 1<br>Highly<br>Confidential | Level 2<br>Bentley<br>Confidential | Level 3<br>Public |
|---|-----------------------------------|------------------------------------|-------------------|
| 1. Use of this data must not violate university policy or any applicable laws and regulations   | required                          | required                           | required          |
| 2. Only authorized users may access or change the data  | required                          | required                           | required          |
| 3. Login credentials (user name/password) are required, unique, and kept confidential           | required                          | required                           | required          |
| 4. Two-factor authentication  | required                          | recommended                        | not required      |
| 5. Encrypt credentials and data during transmission via secure authentication methods           | required                          | required                           | not required      |
| 6. Encrypt data at rest   | required                          | strongly recommended               | not required      |
| 7. Only store data on authorized devices*, and in approved and secured locations                | required                          | strongly recommended               | not required      |
| 8. Data sharing with vendors and third-parties requires a vetted contract and a security review | required                          | required                           | not required      |
| 9. Store printed materials securely   | required                          | required                           | not required      |
| 10. Destroy data according to university policies and procedures                                | required                          | required                           | not required      |
| 11. Make data available to the public   | prohibited                        | prohibited                         | acceptable        |

\* Authorized devices include Bentley OneDrive, Bentley Sharepoint or Teams sites, Bentley provided laptops, Bentley's Azure environment

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## Related Policies and Procedures

The requirements and responsibilities articulated in this policy are embodied in numerous Bentley policies and procedures, including, but not limited to:

*Acceptable Use Policy*

*Information Security Policy*

*Records Retention and Destruction Policy*

*Vendor Risk Management Documents*

*Policy Exceptions Process / Exception Request Form*

*Enterprise Applications Policy*

\*Note: A list of the policies that function under IT and information security management can be found on the Bentley University website: <https://www.bentley.edu/offices/it/policies-all>

## Contacts and Web Resources

For immediate reporting of a possible information security incident, contact the Helpdesk at X3447 or [helpdesk@bentley.edu](mailto:helpdesk@bentley.edu)

For information security questions, or to request a policy exception, contact [cybersecurity@bentley.edu](mailto:cybersecurity@bentley.edu)

## Revision History

| Version | Date       | Author  | Approvers                     | Notes   |
|---------|------------|---|-------------------------------|---|
| 1.0     | 1/29/2010  | IT/Security   | Information Privacy Committee | Original Document   |
| 2.0     | 9/30/2013  | IT/Security   | Information Privacy Committee | Rev 2   |
| 3.0     | 2/28/2019  | Erika Powell-Burson, CISO<br><br>Tisha Arffa, InfoSecurity PM | CIO                           | <ul style="list-style-type: none"> <li>- Tightened L1 / L2 / L3 definitions</li> <li>- Renamed L1 to "Highly Confidential; L2 to "Bentley Confidential"; L3 to "Public"</li> <li>- Updated minimum data security standards and examples, adding 3 new controls (#'s 4, 6, 8)</li> <li>- Moved handling controls to the Acceptable Use Policy</li> <li>- Moved record retention and data destruction controls to the Record Retention and Destruction Policy</li> <li>- Updated contact information</li> </ul> |
| 3.1     | 1/29/2020  | Mike Gioia, ISO   | DCIO                          | Updated Minimum Protection Requirements – Removed #8 Risk assessments and #12 social media  |
| 3.2     | 5/13/2021  | Mike Gioia, ISO   | Data Privacy Committee        | Annual Review. No changes   |
| 3.3     | 4/4/2023   | David Norman, CISO  | CIO                           | Updates to include research data and list of authorized devices   |
| 3.4     | 11/10/2023 | David Norman CISO   | CIO                           | Minor updates to links  |