

Data Classification Matrix

Placement of Data Relevant to Classification

Storage	Public	Sensitive	Confidential: FERPA (Student Information)	Confidential: HIPAA/PHI (Health Information)	Confidential: GLBA (Financial Information)	Confidential: SSN (Social Security Number)	Confidential: PCI (Credit Card)
ERP (Banner/Workday/ImageNow)	YES	YES	YES	YES	YES	YES	NO**
College Managed Server (on premise or MS Azure)	YES	YES	YES	YES	YES	XX	NO**
Internal Shared Drives (e.g. G:\, I:\, N:\, etc.)	YES	YES	YES	YES	YES	XX	NO**
Approved Cloud File Exchange (DropBox)	YES	YES	YES	MAYBE*	MAYBE*	XX	NO**
MyMC Portal	YES	YES	YES	MAYBE*	MAYBE*		NO**
Office 365 (Exchange Online/Outlook/OneDrive/Teams)	YES	YES (internal only, not to be sent/shared outside MC without approval)	YES	XX	XX	XX	NO**
Learning Management System	YES	YES	YES	NO	NO	XX	NO**
College Web Site (CMS)	YES	NO	NO	NO	NO	XX	NO**
Local storage/hard drives (C: drive) Workstation or laptop	MAYBE*	NO	NO	NO	NO	XX	NO**
Mobile devices (laptops, phones, tablets, etc.)	MAYBE*	NO	NO	NO	NO	XX	NO**
Personal Media (CD, flash drive, etc.)	MAYBE*	NO	NO	NO	NO	XX	NO**
Other Agencies (Federal, State, Local Agencies and Grant.)	YES	XX	XX	XX	XX	XX	XX
Third Party Vendor	YES	XX	XX	XX	XX	XX	XX

Public

Data approved for distribution to the public without restriction. Its distribution is without potential hazard to the College, affiliates or individuals. Examples include Press Releases and Course Schedule and Directory Information (as defined in Board Policy #41003).

Sensitive

Data that is not protected by regulatory requirements, but is considered internal use only. This Data might include (but is not limited to) employee, academic, planning, facility, emergency or administrative Data that is restricted for reasons related to public or individual safety, competition, ongoing development or is otherwise sensitive in nature. Examples include employment Data, financial transaction Data and purchasing Data.

Confidential

Data that is protected by federal, state, or local law or regulation, College Policy or Procedure, professional code, contract; or other binding mechanism. This includes PII and Confidential Information. Any Data that could, by itself, or in combination with other such data, be used for identity theft, fraud or other such crimes should be treated as Highly Sensitive Data. Examples include Social Security numbers, Credit Cardholder Data (“CHD”) numbers and student records.

Key

* Permitted but not Recommended (no sharing allowed with third parties outside the College unless approved by the Data Trustees)

** PCI DSS - Cardholder data may not be stored on any college networked device or traverse the network at any point

XX- NOT PERMITTED WITHOUT APPROVAL

Acronym Definitions

ERP:	Enterprise Resource Planning software providing the management of main business processes.
CD:	Compact Disc
CMS:	Content Management System
FERPA:	Family Educational Rights and Privacy Act
GLBA:	Gramm-Leach-Bliley Act
HIPAA:	Health Insurance Portability and Accountability Act
PCI DSS:	Payment Card Industry Data Security Standard
PHI:	Protected Health Information
SSN:	Social Security Number