Policy 1114: APPENDIX A
Protected Data Types

Data types on this list will be subject to high levels of security precautions, including a requirement that the data classified as Protected Data - Highly Sensitive be encrypted when stored. This list is not intended to contain all protected data types, just those that have the potential to cause significant damage to individuals or the university. The list of Protected Data - Highly Sensitive types will be reviewed and modified annually by the Information Security Officer.

Two classes of protected data have been identified, as follows:

I. Protective Data - Highly Sensitive

Data that (1) by their personal nature can lead to identity theft or exposure of personal health information, or (2) a researcher, funding agency or other research partner has identified as highly sensitive or otherwise requiring a high level of security protection. No one is permitted to store this data unless a Chief Data Steward has signed the approval form and the storage device or media is protected with the university’s encryption program.

i. With respect to the potential for identity theft, the following information has been defined by the university as highly sensitive:

   Student Information:
   
   Social Security number associated with a personal identifier
   
   Date of birth associated with a personal identifier
   
   Driver’s license information associated with a personal identifier
   
   Visa information
   
   Employee/Donor/Contractor/Affiliate Information:
   
   Social Security number associated with a personal identifier
   
   Date of birth associated with a personal identifier
   
   Driver’s license associated with a personal identifier
   
   Background checks

ii. With respect to Access Control and Technology Information, the following information has been defined by the University as highly sensitive:
Passwords/PINs and cryptographic private keys associated with User IDs
Network diagrams that include detailed configuration information or network device
configurations (including server names, IP addresses, etc.)
Security configurations related to network devices and systems, etc.

iii. With respect to financial data, the following information has been defined by the University
as highly sensitive:

Credit card numbers associated with a personal identifier
Financial aid/scholarship information that is defined by the U.S. Department of Education as
requiring a high level of security protection, including student and parent tax returns
Bank account information associated with a personal identifier sufficient to provide access to the
account

II. Protected Data - Restricted

Data that by their very nature or regulation, are private or confidential and must not to be
disclosed except to a previously defined set of authorized users.

Examples include data defined as confidential by the Family Educational Rights and Privacy Act
(FERPA), employee performance evaluations, confidential donor information, some research
data, minutes from confidential meetings, accusations of misconduct, or any other information
that has been identified by the University, its contractors or funding agencies, or Federal or State
regulations, as private or confidential and not to be disclosed.

With respect to FERPA data, please consult the Registrar’s web site for the complete list of
restricted data types:
http://Registrar.gmu.edu/ferpa/