

**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/>