

DATA CLASSIFICATION AND HANDLING

Effective Date: January 31, 2021 Last Revised: August 19, 2022

DATA TYPE EXAMPLES

The capitalized terms used herein are defined in the Data Classification and Handling policy.

DATA TYPE EXAMPLE CATEGORIES INCLUDE:

- Directory Information
- Employee Records
- Financial Records
- Health Records
- Institutional Records
- Law Enforcement Records
- Library Records
- Personally Identifiable Information
- Student Records
- University Research

Data Type	Level 1 Public Data	Level 2 Internal Data	Level 3 Sensitive Data	Level 4 Highly Sensitive Data
Directory Information	Employee titles and campus email address and telephone numbers, if not marked as restricted NAU User ID (NAU UID) – not to be listed in a public forum or large aggregate lists Student directory information, if not marked as restricted For a full list of student Directory Information please visit https://in.nau.edu/ferpa/page-9/		Employee personal telephone number, personal email address, personal mailing address Parent or other family member names, emergency contact information Student directory information as listed in level 1, if marked as restricted	

Employee Records	Employee titles and campus email address and telephone numbers, if not marked as restricted Explanations of general employment benefits		Background checks and investigations Benefits elections Employee evaluations Employment history	
Financial Records		University financial or budgetary information	Bank account information Student financial aid	Payment Credit Card Industry Data Security Standards (PCI-DSS) data, such as credit card numbers with or without extra data (cardholder name, security code) used in transmission
Health Records			Personal medical or counseling records	Medical records used to document care provided to students and employees Medical records used to document care provided to outside parties interfacing with NAU academic health programs
Institutional Records	Factual reporting required by law (e.g., enrollment figures, state budget information) Job postings Public event calendars or press releases The University's website and campus maps intended for public use	Information security vulnerabilities Intranet – internal web sites (e.g., SharePoint sites) Network diagrams, building blueprints, critical	Building safety plans, HVAC monitoring and control data Information proprietary to the University Information protected by the attorney-client privilege or any	

		infrastructure plans Purchasing, contracting, grants, sponsored projects University financial or budgetary information	other applicable privilege Sealed bids prior to purchasing awards and contracts Security camera recordings	
Law Enforcement Records			Law enforcement records	
Library Records	Library catalog information		Library registration records or circulation records related to individual patrons	
Personally Identifiable Information	Directory photos uploaded by the user	Employee ID (also known as PeopleSoft ID) NAU UserID (NAU UID)	Biometric Information (fingerprint, voice recording, DNA) Birth date (full: mm-dd-yy or partial: mm-dd only) Birth date combined with last four digits of Social Security Number (SSN) Birthplace (city, state, country if not USA) Driver License, Passport, or other forms of Personal Identity Information Ethnicity Gender Marital Status Mother's Maiden Name Photograph	Level 3 Sensitive Data when combined with other personally identifiable information

Student Records	Anonymously recorded data (human subjects	Prospective student and student applicant personal information	description Social Security Number Tax Identification Numbers Educational records, including disciplinary records Educational services received Identifiable interview / survey	Controlled Unclassified Information (CUI)
University Research	data) posing no harm to participants (as determined by the Institutional Review Board) Research data from any public source, such as US Census public data Research data or findings intended for public disclosure Research data that has been de-identified (human subjects data) and poses no harm to participants (as determined by the Institutional Review Board)		information (human subjects data) Limited Data Sets obtained from a covered healthcare entity through a Data Use Agreement Research data containing identifiable biospecimen data Research proposals, methods, protocols, and disclosures Restricted Data Sets - data with indirect identifiers (human subjects data) - data obtained through an external data owner with an agreement containing restrictions Unpublished research data	Defense Federal Acquisition Regulation Supplement (DFARS) Export controlled research information (International Traffic in Arms Regulation (ITAR) and Export Administration Regulations (EAR)) Human subjects research, deemed by the Institutional Review Board to pose harm Medical records used in research (Protected Health Information (PHI)) Research data subject to federal regulations Research involving vulnerable populations as determined by the Institutional Review Board