Information Sensitivity Policy

1.0 Purpose

The Information Sensitivity Policy is intended to help employees determine what information can be disclosed to non-employees, as well as the relative sensitivity of information that should not be disclosed outside of <Company Name> without proper authorization.

The information covered in these guidelines includes, but is not limited to, information that is either stored or shared via any means. This includes: electronic information, information on paper, and information shared orally or visually (such as telephone and video conferencing).

All employees should familiarize themselves with the information labeling and handling guidelines that follow this introduction. It should be noted that the sensitivity level definitions were created as guidelines and to emphasize common sense steps that you can take to protect <Company Name> Confidential information (e.g., <Company Name> Confidential information should not be left unattended in conference rooms).

Please Note: The impact of these guidelines on daily activity should be minimal.

Questions about the proper classification of a specific piece of information should be addressed to your manager. Questions about these guidelines should be addressed to Infosec.

2.0 Scope

All <Company Name> information is categorized into two main classifications:
- <Company Name> Public
- <Company Name> Confidential

<Company Name> Public information is information that has been declared public knowledge by someone with the authority to do so, and can freely be given to anyone without any possible damage to <Company Name> Systems, Inc.

<Company Name> Confidential contains all other information. It is a continuum, in that it is understood that some information is more sensitive than other information, and should be protected in a more secure manner. Included is information that should be protected very closely, such as trade secrets, development programs, potential acquisition targets, and other information integral to the success of our company. Also included in <Company Name> Confidential is information that is less critical, such as telephone directories, general corporate information, personnel information, etc., which does not require as stringent a degree of protection.

A subset of <Company Name> Confidential information is "<Company Name> Third Party Confidential" information. This is confidential information belonging or pertaining to another corporation which has been entrusted to <Company Name> by that company under non-disclosure agreements and other contracts. Examples of this type of information include everything from joint development efforts to vendor lists, customer orders, and supplier information. Information in this category ranges from extremely sensitive to information about the fact that we've connected a supplier / vendor into <Company Name>'s network to support our operations.

<Company Name> personnel are encouraged to use common sense judgment in securing <Company Name> Confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their manager

3.0 Policy

The Sensitivity Guidelines below provides details on how to protect information at varying sensitivity levels. Use these guidelines as a reference only, as <Company Name> Confidential information in each

column may necessitate more or less stringent measures of protection depending upon the circumstances and the nature of the <Company Name> Confidential information in question.

3.1 **Minimal Sensitivity:** General corporate information; some personnel and technical information

Marking guidelines for information in hardcopy or electronic form.

Note: any of these markings may be used with the additional annotation of "3rd Party Confidential".

Marking is at the discretion of the owner or custodian of the information. If marking is desired, the words "<Company Name> Confidential" may be written or designated in a conspicuous place on or in the information in question. Other labels that may be used include "<Company Name> Proprietary" or similar labels at the discretion of your individual business unit or department. Even if no marking is present, <Company Name> information is presumed to be "<Company Name> Confidential" unless expressly determined to be <Company Name> Public information by a <Company Name> employee with authority to do so.

Access: <Company Name> employees, contractors, people with a business need to know.
Distribution within <Company Name>: Standard interoffice mail, approved electronic mail and electronic file transmission methods.
Distribution outside of <Company Name> internal mail: U.S. mail and other public or private carriers, approved electronic mail and electronic file transmission methods.
Electronic distribution: No restrictions except that it be sent to only approved recipients.
Storage: Keep from view of unauthorized people; erase whiteboards, do not leave in view on tabletop. Machines should be administered with security in mind. Protect from loss; electronic information should have individual access controls where possible and appropriate.
Disposal/Destruction: Deposit outdated paper information in specially marked disposal bins on <Company Name> premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.
Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

3.2 **More Sensitive:** Business, financial, technical, and most personnel information

Marking guidelines for information in hardcopy or electronic form.

Note: any of these markings may be used with the additional annotation of "3rd Party Confidential". As the sensitivity level of the information increases, you may, in addition or instead of marking the information "<Company Name> Confidential" or "<Company Name> Proprietary", wish to label the information "<Company Name> Internal Use Only" or other similar labels at the discretion of your individual business unit or department to denote a more sensitive level of information. However, marking is discretionary at all times.

Access: <Company Name> employees and non-employees with signed non-disclosure agreements who have a business need to know.
Distribution within <Company Name>: Standard interoffice mail, approved electronic mail and electronic file transmission methods.
Distribution outside of <Company Name> internal mail: Sent via U.S. mail or approved private carriers.
Electronic distribution: No restrictions to approved recipients within <Company Name>, but should be encrypted or sent via a private link to approved recipients outside of <Company Name> premises.
Storage: Individual access controls are highly recommended for electronic information.

Disposal/Destruction: In specially marked disposal bins on <Company Name> premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.
Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

3.3 **Most Sensitive:** Trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company

Marking guidelines for information in hardcopy or electronic form.

Note: any of these markings may be used with the additional annotation of "3rd Party Confidential". To indicate that <Company Name> Confidential information is very sensitive, you may should label the information "<Company Name> Internal: Registered and Restricted", "<Company Name> Eyes Only", "<Company Name> Confidential" or similar labels at the discretion of your individual business unit or department. Once again, this type of <Company Name> Confidential information need not be marked, but users should be aware that this information is very sensitive and be protected as such.

Access: Only those individuals (<Company Name> employees and non-employees) designated with approved access and signed non-disclosure agreements.
Distribution within <Company Name>: Delivered direct - signature required, envelopes stamped confidential, or approved electronic file transmission methods.
Distribution outside of <Company Name> internal mail: Delivered direct; signature required; approved private carriers.
Electronic distribution: No restrictions to approved recipients within <Company Name>, but it is highly recommended that all information be strongly encrypted.
Storage: Individual access controls are very highly recommended for electronic information. Physical security is generally used, and information should be stored in a physically secured computer.
Disposal/Destruction: Strongly Encouraged: In specially marked disposal bins on <Company Name> premises; electronic data should be expunged/cleared. Reliably erase or physically destroy media.
Penalty for deliberate or inadvertent disclosure: Up to and including termination, possible civil and/or criminal prosecution to the full extent of the law.

4.0 Enforcement
Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

5.0 Definitions
Terms and Definitions

Appropriate measures
To minimize risk to <Company Name> from an outside business connection. <Company Name> computer use by competitors and unauthorized personnel must be restricted so that, in the event of an attempt to access <Company Name> corporate information, the amount of information at risk is minimized.

Configuration of <Company Name>-to-other business connections
Connections shall be set up to allow other businesses to see only what they need to see. This involves setting up both applications and network configurations to allow access to only what is necessary.

Delivered Direct; Signature Required
Do not leave in interoffice mail slot, call the mail room for special pick-up of mail.

Approved Electronic File Transmission Methods
Includes supported FTP clients and Web browsers.

Envelopes Stamped Confidential
You are not required to use a special envelope. Put your document(s) into an interoffice envelope, seal it, address it, and stamp it confidential.

Approved Electronic Mail
Includes all mail systems supported by the IT Support Team. These include, but are not necessarily limited to, [insert corporate supported mailers here…]. If you have a business need to use other mailers contact the appropriate support organization.

Approved Encrypted email and files
Techniques include the use of DES and PGP. DES encryption is available via many different public domain packages on all platforms. PGP use within <Company Name> is done via a license. Please contact the appropriate support organization if you require a license.

Company Information System Resources
Company Information System Resources include, but are not limited to, all computers, their data and programs, as well as all paper information and any information at the Internal Use Only level and above.

Expunge
To reliably erase or expunge data on a PC or Mac you must use a separate program to overwrite data, supplied as a part of Norton Utilities. Otherwise, the PC or Mac's normal erasure routine keeps the data intact until overwritten. The same thing happens on UNIX machines, but data is much more difficult to retrieve on UNIX systems.

Individual Access Controls
Individual Access Controls are methods of electronically protecting files from being accessed by people other than those specifically designated by the owner. On UNIX machines, this is accomplished by careful use of the chmod command (use *man chmod* to find out more about it). On Mac's and PC's, this includes using passwords on screensavers, such as Disklock.

Insecure Internet Links
Insecure Internet Links are all network links that originate from a locale or travel over lines that are not totally under the control of <Company Name>.

Encryption
Secure <Company Name> Sensitive information in accordance with the *Acceptable Encryption Policy*. International issues regarding encryption are complex. Follow corporate guidelines on export controls on cryptography, and consult your manager and/or corporate legal services for further guidance.

One Time Password Authentication
One Time Password Authentication on Internet connections is accomplished by using a one time password token to connect to <Company Name>'s internal network over the Internet. Contact your support organization for more information on how to set this up.

Physical Security
Physical security means either having actual possession of a computer at all times, or locking the computer in an unusable state to an object that is immovable. Methods of accomplishing this include having a special key to unlock the computer so it can be used, thereby ensuring that the computer cannot be simply rebooted to get around the protection. If it is a laptop or other portable computer, never leave it alone in a conference room, hotel room or on an airplane seat, etc. Make arrangements to lock the device in a hotel safe, or take it with you. In the office, always use a lockdown cable. When leaving the office for the day, secure the laptop and any other sensitive material in a locked drawer or cabinet.

Private Link
A Private Link is an electronic communications path that <Company Name> has control over it's entire distance. For example, all <Company Name> networks are connected via a private link. A computer with

modem connected via a standard land line (not cell phone) to another computer have established a private link. ISDN lines to employee's homes is a private link. <Company Name> also has established private links to other companies, so that all email correspondence can be sent in a more secure manner. Companies which <Company Name> has established private links include all announced acquisitions and some short-term temporary links

6.0 Revision History