

## Information & Information Asset Access, Transmission and Storage Policy

**Purpose of the Policy:** to establish a framework for access, transmission and storage of information both external and internal stakeholders including but not limited to students, employees and contractors.

**In this Policy:** Access, Transmission and Storage Policy is based on the Information Security Classification Standard

### Security Classification is as follows:

Data Custodians will classify Information Assets with respect to their Confidentiality using one of the following four categories:

Classification	Definition	Examples
<b>Level 1: Public</b>	<ul style="list-style-type: none"> <li>- Information deemed to be public by legislation and/or under College policy;</li> <li>- Information in the public domain.</li> </ul>	name of employees business contact information, college programs, degree awarded, convocation date, annual reports, public announcements, telephone directory etc.
<b>Level 2: Internal Use</b>	<ul style="list-style-type: none"> <li>- Information not approved for general circulation outside the college</li> <li>-Information the disclosure or loss of which would inconvenience the College</li> </ul>	internal memos sent to all members of the college, minutes of college meetings that are circulated to all employees and students, anonymized or de-identified human subject data etc.
<b>Level 3: Confidential</b>	<p>Information that is available only to authorized persons</p> <p>Information; the disclosure or loss of which could seriously impede the College's operations; Adversely affect the College's operation; or cause reputational damage; and obligate the College's to report to the government or other regulating body and/or provide notice to affected individuals</p>	<ul style="list-style-type: none"> <li>- staff employment applications, personnel files, date of birth, health information and personal contact information</li> <li>- admission applications, student enrollment status, grades etc</li> <li>- information commonly used to establish identity such as a driver's license or passport</li> <li>- intellectual property and authentication verifiers including passwords</li> </ul>

<p><b>Level 4: Restricted</b></p>	<ul style="list-style-type: none"> <li>- Information that is confidential; and subject to specific privacy and security safeguards under law, policy or contractual agreement.</li> <li>-Information the loss or disclosure of which could cause severe harm to individuals or Glenbow College;</li> <li>- Information the loss or disclosure of which may obligate Glenbow College to report to the government or other regulating body and/or provide notice to affected individuals</li> </ul>	<ul style="list-style-type: none"> <li>-payment card information including: PAN, cardholder name,CVV2/CVC2/CID;</li> <li>-health information when it can be linked to an identifiable</li> <li>- identifiable human subject research data;</li> <li>-information that is subject to special government requirements in the interests of national security.</li> </ul>
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**Information Asset Access, Transmission and Storage Requirements:**

Level	Labels	Access	Transmission	Storage
1	Public	<p><b>Read</b></p> <ul style="list-style-type: none"> <li>- no restrictions.</li> </ul> <p><b>Write/Edit</b></p> <ul style="list-style-type: none"> <li>- limited to Data Trustee or delegate</li> </ul> <p><b>Access Controls</b></p> <ul style="list-style-type: none"> <li>- none required</li> </ul>	<ul style="list-style-type: none"> <li>- no special safeguards required.</li> </ul>	<ul style="list-style-type: none"> <li>- no special safeguards required.</li> </ul>
2	Internal Use	<p><b>Read</b></p> <ul style="list-style-type: none"> <li>- limited to employees and other authorized users who have a work-related need to access the information;</li> <li>- access privileges determined by the Data Trustee; and can be based on position or on role definition.</li> </ul> <p><b>Write/Edit</b></p> <ul style="list-style-type: none"> <li>- limited to Data Trustee or delegate.</li> </ul> <p><b>Access Controls</b></p> <ul style="list-style-type: none"> <li>- access information through the local network or VPN;</li> <li>- password authentication required;</li> </ul>	<ul style="list-style-type: none"> <li>- <b>Encryption (or similar mechanism):</b> recommended when transmitting information via public networks (e.g. Internet);</li> <li>- <b>encryption (or similar mechanism)</b> optional when transmitting via local network.</li> </ul>	<p><b>Electronic</b></p> <ul style="list-style-type: none"> <li>- information must be stored within a controlled access system;</li> <li>- the server must be on a network that is not visible to public networks;</li> <li>- information may be stored on a server that is: <ul style="list-style-type: none"> <li>o managed and monitored internally; OR managed by a third party and when a contract with the third party is in place ( G suite).</li> </ul> </li> <li>- Encryption (or similar mechanism): <ul style="list-style-type: none"> <li>o optional when information is stored within the Colleges IT assets</li> </ul> </li> </ul> <p><b>Paper</b></p> <ul style="list-style-type: none"> <li>- store records in a locked file cabinet;</li> <li>- access to the cabinet restricted to those authorized by the Data Trustee or designate.</li> </ul>

3	<b>Confidential</b>	<p><b>Read</b></p> <ul style="list-style-type: none"> <li>- limited to employees and other authorized users who have a work-related need to access the information;</li> <li>- access privileges determined by the Data Trustee; based on position or on role definition.</li> </ul> <p><b>Write/Edit</b></p> <ul style="list-style-type: none"> <li>- limited to Data Trustee or delegate.</li> </ul> <p><b>Access Controls</b></p> <ul style="list-style-type: none"> <li>- access information through the Local Network or VPN;</li> <li>- password authentication required;</li> <li>- two-Factor Authentication required for remote access.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>Encryption (or similar mechanism):</b> recommended when transmitting information via public networks (e.g. Internet);</li> <li>- <b>encryption (or similar mechanism)</b> optional when transmitting via local network.</li> </ul>	<p><b>Electronic</b></p> <ul style="list-style-type: none"> <li>- information must be stored within a controlled access system;</li> <li>- the server must be on a network that is not visible to public networks;</li> <li>- information may be stored on a server that is: <ul style="list-style-type: none"> <li>o managed and monitored internally; OR managed by a third party and when a contract with the third party is in place ( G suite).</li> </ul> </li> </ul> <p>Encryption (or similar mechanism):</p> <ul style="list-style-type: none"> <li>o required when information is stored outside the Colleges Data Centre;</li> <li>o optional when information is stored on premise.</li> </ul> <p><b>Paper</b></p> <ul style="list-style-type: none"> <li>- store records in a locked file cabinet;</li> <li>- access to the cabinet restricted to those authorized by the Data Trustee or designate.</li> </ul>
4	<b>Restricted</b>	<p><b>Read</b></p> <ul style="list-style-type: none"> <li>- as above for Level 3.</li> </ul> <p><b>Write/Edit</b></p> <ul style="list-style-type: none"> <li>- as above for Level 3.</li> </ul> <p><b>Access Controls</b></p> <ul style="list-style-type: none"> <li>- as above for Level 3 unless additional controls are required under law or contract.</li> </ul>	<ul style="list-style-type: none"> <li>- as above for level 3 unless encryption (or similar mechanism) is required under law or contract when transmitting via local network.</li> </ul>	<p><b>Electronic</b></p> <ul style="list-style-type: none"> <li>- as above for Level 3 unless additional controls are required under law or contract;</li> <li>- encryption (or similar mechanism): as above for Level 3 unless encryption (or similar mechanism) is required under law or contract even when information is stored on premise.</li> </ul> <p><b>Paper</b></p> <ul style="list-style-type: none"> <li>- store records in a locked file cabinet;</li> <li>- access to the cabinet restricted to those authorized by the Data Trustee or designate.</li> </ul>