# PENN DATA RISK CLASSIFICATION

## CATEGORIES

<table>
<thead>
<tr>
<th>Classification</th>
<th>LOW</th>
<th>MODERATE</th>
<th>HIGH</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. The data is intended for public disclosure, or</td>
<td>1. The data is not generally available to the public; or</td>
<td>1. Protection of the data is required by law/regulation and Penn is required to report to the government and/or provide notice to the individual if the data is inappropriately accessed; or</td>
</tr>
<tr>
<td></td>
<td>2. The loss of confidentiality, integrity; or availability of the data or system would have no adverse impact on the University’s mission, safety, finances, or reputation and the loss would have no adverse impact on any individual.</td>
<td>2. The loss of confidentiality, integrity, or availability of the data or system could have a mildly adverse impact on the University’s mission, safety, finances, or reputation or the loss would have a mildly adverse impact on any individual.</td>
<td>2. The loss of confidentiality, integrity, or availability of the data or system could have a significant adverse impact on the University’s mission, safety, finances, or reputation or the loss would have a significant adverse impact on any individual.</td>
</tr>
</tbody>
</table>

## Examples

### LOW
- PennKey user name
- PennID
- Information authorized to be available on or through Penn’s website without PennKey authentication
- Policy and procedure manuals designated by the owner as public
- Job postings
- University directory information that has been designated for public view.
- Publicly available campus maps
- Research data (at data owner’s discretion), subject to any IRB restrictions

### MODERATE
- Student education records and admission applications (excluding K-12 student records)
- Non-public Penn policies and policy manuals
- Non-public contracts that do not relate to a sensitive matter
- Penn internal memos and email, non-public reports, budgets, plans, financial information that do not contain High Risk data
- Engineering, design, and operational information regarding Penn infrastructure
- University directory information that has been designated for Penn view or otherwise restricted
- Unpublished research data (at data owner’s discretion), subject to any IRB restrictions.

### HIGH
- Health Information, including Protected Health Information (PHI)
- Mental health records
- Biometric data (e.g., DNA, fingerprint)
- PennKey password and other system credentials
- Health Insurance policy ID numbers
- Social Security Numbers
- Credit card numbers
- Financial account numbers
- Location Data that actively tracks an individual
- Export controlled information under U.S. laws
- Driver’s license numbers or other government-issued ID numbers
- Passport or visa numbers
- Student, faculty or staff disciplinary records
- Certain HR records (salary, performance)
- Donor contact information and non-public gift information
- K-12 student records and any data related to minors
- Information concerning the types, location and security of potentially hazardous materials and equipment