### PENN DATA RISK CLASSIFICATION

#### CATEGORIES

<table>
<thead>
<tr>
<th>Classification</th>
<th>LOW</th>
<th>MODERATE</th>
<th>HIGH</th>
</tr>
</thead>
</table>
|                | 1. The data is intended for public disclosure, or  
|                | 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. | 1. The data is not generally available to the public; or  
|                | 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. | 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  
|                | 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. |

#### 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  - Unpublished research data (at data owner’s discretion), subject to any IRB restrictions.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