

**Data Classification Policy**  
*Revised February 2020*

This Data Classification Document provides definitions and examples of Covenant College’s two data categories: Public and Private. Information assets have been classified into categories for two reasons:

1. To determine who is allowed access to the information
2. To determine what precautions must be taken to protect the information

It is the data and service owner’s responsibility to ensure that appropriate security measures are taken.

**Public Information**

Public information is defined as information that is intended for public disclosure or information that may be shared with anyone without adverse impact on Covenant College’s mission, safety, finances, or reputation. Such information may be disclosed by the institution for any purpose at its discretion, but is not required to be disclosed except where required by federal and state regulations.

The Covenant issued Banner ID should be used with a person’s name to identify a specific individual in any form of electronic communication. Under no circumstances should Personally Identifiable Information (PII) be used in electronic communication. PII would include an individual’s full legal name, social security number, full date of birth, driver’s license number, or passport number.

Covenant designates the following categories of information as public or “directory information.” All other information is private and may be released outside Covenant only with the individual’s written permission:

<b>Student</b>	<b>Employee</b>	<b>Donor/Constituent</b>
Biographical: <ul style="list-style-type: none"> <li>● Name</li> <li>● Address</li> <li>● Telephone number</li> <li>● Covenant College Email address</li> <li>● Covenant Banner ID</li> <li>● Photographs and video</li> </ul> Enrollment: <ul style="list-style-type: none"> <li>● Dates of attendance</li> <li>● Enrollment status</li> </ul>	Biographical: <ul style="list-style-type: none"> <li>● Name</li> <li>● Address</li> <li>● Telephone number</li> <li>● Covenant College Email address</li> <li>● Covenant Banner ID</li> <li>● Photograph and video</li> </ul> Employment: <ul style="list-style-type: none"> <li>● Dates of employment</li> </ul>	Biographical: <ul style="list-style-type: none"> <li>● Name</li> <li>● Address</li> <li>● Personal Email address (opt-in)</li> <li>● Graduation Year</li> <li>● Level of giving</li> <li>● Gifts in honor or memorial information</li> <li>● Covenant Banner ID</li> <li>● Photograph and video</li> </ul>

<ul style="list-style-type: none"> <li>● Class level</li> <li>● Previous institution(s) attended</li> <li>● Major field of study</li> <li>● Awards and honors</li> <li>● Degrees conferred (including dates)</li> </ul> <p>Athletic:</p> <ul style="list-style-type: none"> <li>● Past and present participation in officially recognized sports and activities</li> <li>● Physical factors (height, weight of athletes)</li> <li>● Place of birth</li> </ul>	<ul style="list-style-type: none"> <li>● Employment status</li> <li>● Job title</li> </ul>	
<p>Campus-wide:</p> <ul style="list-style-type: none"> <li>● Official statements and press releases</li> <li>● Campus maps</li> <li>● Policy and procedure manuals designated by the owner as public</li> <li>● Job-postings</li> </ul>		

Currently enrolled students may withhold disclosure of directory information under FERPA by submitting a written request to withhold disclosure to the Office of Records. No information — public or private — on an applicant’s record may be released outside Covenant, except to an agent designated by the applicant, until the applicant becomes a registered student and has an opportunity to initiate a suppress.

Donors may withhold disclosure of directory information by notifying the Office for Advancement.

**Private Information**

Private information is defined as information that is regulated by law/regulation or not generally available to the public. Loss of confidentiality of this data could have an adverse impact on Covenant’s mission, safety, finances, or reputation. All information that requires Covenant to self-report to the government if it is inappropriately accessed is considered confidential. No information on financial aid records may be released outside Covenant except as authorized or required by federal and state regulations.

Covenant designates the following categories of information as private or “confidential information.” Please note this is not an exhaustive list.

<b>Student</b>	<b>Employee</b>	<b>Donor/Constituent</b>
<p>Biographical:</p> <ul style="list-style-type: none"> <li>● Social security number</li> <li>● Full date of birth</li> <li>● Passport number</li> <li>● Driver's license number or state-issued identification card number</li> <li>● Personal Email address</li> </ul> <p>Admission:</p> <ul style="list-style-type: none"> <li>● Admissions forms</li> <li>● FAFSA forms and supporting documentation</li> <li>● I-9 forms</li> </ul> <p>Payroll:</p> <ul style="list-style-type: none"> <li>● Pay stubs,</li> <li>● Direct deposit forms</li> <li>● Tax forms</li> </ul> <p>Academic:</p> <ul style="list-style-type: none"> <li>● Grades</li> </ul> <p>Medical:</p> <ul style="list-style-type: none"> <li>● Insurance forms</li> <li>● Medical records</li> </ul> <p>Student Records:</p> <ul style="list-style-type: none"> <li>● Disciplinary records</li> <li>● Counseling records</li> </ul>	<p>Biographical:</p> <ul style="list-style-type: none"> <li>● Social security number</li> <li>● Full date of birth</li> <li>● Passport number</li> <li>● Driver's license number or state-issued identification card number</li> <li>● Ethnic background</li> <li>● Personal Email address</li> </ul> <p>Hiring:</p> <ul style="list-style-type: none"> <li>● Background checks</li> <li>● I-9 forms</li> </ul> <p>Performance:</p> <ul style="list-style-type: none"> <li>● Performance reviews</li> <li>● Warnings and disciplinary notices</li> </ul> <p>Compensation and benefits:</p> <ul style="list-style-type: none"> <li>● Salary or hourly pay rates</li> <li>● Benefits information</li> </ul> <p>Payroll:</p> <ul style="list-style-type: none"> <li>● Pay stubs</li> <li>● Direct deposit forms, garnishments</li> <li>● Tax forms</li> </ul> <p>Termination:</p> <ul style="list-style-type: none"> <li>● Termination or layoff records</li> <li>● Unemployment insurance claims</li> </ul> <p>Medical:</p> <ul style="list-style-type: none"> <li>● Insurance and benefit enrollment</li> </ul>	<p>Biographical:</p> <ul style="list-style-type: none"> <li>● Social security number</li> <li>● Full date of birth</li> <li>● Passport number</li> <li>● Driver's license number or state-issued identification card number</li> <li>● Telephone number</li> <li>● Personal Email address (did not opt-in)</li> </ul> <p>Financial:</p> <ul style="list-style-type: none"> <li>● Bank account information (note: Credit card information is handled by a secure third party and is not stored by Covenant College)</li> </ul>

	<p>forms</p> <ul style="list-style-type: none"> <li>● Workers' compensation records</li> <li>● FMLA leave certifications</li> <li>● Reasonable accommodations under ADA</li> </ul> <p>Campus-wide:</p> <ul style="list-style-type: none"> <li>● Budgets, financial information</li> <li>● Covenant College credit card numbers</li> </ul>	
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**Email Ownership**

The College's email system is the property of Covenant College, and the user does not have personal privacy rights in any matter created, received, or sent from the e-mail system. The College reserves the right to monitor the College email system at any time and for any purpose. The College's email system may not be used to violate any law or College policy.

**Document Retention Policy**

For more information regarding data security procedures please see Student Records Retention Policy and the Financial Record Retention Policy.