



Owl Live Data Classification policy

Purpose

In order to preserve the appropriate confidentiality, integrity and availability of Owl Live and its client's information assets, the company must make sure they are protected against unauthorized access, disclosure or modification. This is not just critical for assets covered by the Data Protection Act, but also for all business conducted across the company. Different types of information require different security measures depending upon their sensitivity. Owl Live's information classification standards are designed to provide information owners with guidance on how to classify information assets properly and then use them accordingly. This guidance — developed in accordance with the Owl Live's Information Security and Data Protection Policies — includes classification criteria and categories, as well as rules for the delegation of classification tasks.

Scope

This standard applies to all Owl Live information, irrespective of the data location or the type of device it resides on. It should consequently be used by all employees and third parties who interact with information held by and on behalf of the Owl Live or its clients. Any legal or contractual stipulations over information classification take precedence over this standard.

Assumptions

The legal definitions laid out in the Data Protection Act continue to be relevant and require the currently understood levels of protection. The mechanisms offered as recommendations in this proposal continue to exist and are available to those that need them. The reader has sufficient technical knowledge to implement the controls as laid out.

Responsibilities

All Owl Live employees, third parties and collaborators on Owl Live and / or its client's projects are users of information. They are responsible for assessing and classifying the information they work with, and applying the appropriate controls. Owl live employees must respect the security classification of any information as defined, and must report the inappropriate situation of information to the Managing Director or HR & Finance Manager as quickly as possible.

Information Classification Definitions

The following table provides a summary of the information classification levels that have been adopted by Owl Live. These classification levels explicitly incorporate the Data Protection Act's (DPA) definitions of Personal Data and Sensitive Personal Data,

1. Confidential

'Confidential' information has significant value for Owl Live, and unauthorized disclosure or dissemination could result in severe financial or reputational damage to Owl Live and its clients, (including fines of up to £500,000 from the Information Commissioner's Office). Data that is defined by the Data Protection Act as Sensitive Personal Data falls into this category. Only those who explicitly need access must be granted it, and only to the least degree in order to do their work (the 'need to know' and 'least privilege' principles). When held outside Owl live, on mobile devices such as laptops, tablets or phones, or in transit, 'Confidential' information must be protected behind an explicit password and by AES 256-bit encryption at the device, drive or file level.



2. Restricted

'Restricted' information is subject to controls on access, such as only allowing valid logons from a small group of staff. 'Restricted' information must be held in such a manner that prevents unauthorised access i.e. on a system that requires a valid and appropriate user to log in before access is granted. Information defined as Personal Data by the Data Protection Act falls into this category. Disclosure or dissemination of this information is not intended, and may incur some negative publicity, but is unlikely to cause severe financial or reputational damage to Owl Live. Note that under the Data Protection Act large datasets (>1000 records) of 'Restricted' information may become classified as Confidential, thereby requiring a higher level of access control.

3. Internal Use

'Internal use' information can be disclosed or disseminated by its owner to appropriate members of Owl Live, partners and other individuals, as appropriate by information owners without any restrictions on content or time of publication.

4. Public

'Public' information can be disclosed or disseminated without any restrictions on content, audience or time of publication. Disclosure or dissemination of the information must not violate any applicable laws or regulations, such as privacy rules. Modification must be restricted to individuals who have been explicitly approved by information owners to modify that information, and who have successfully authenticated themselves to the appropriate computer system.

Please refer to the classification matrix for further examples for the varying levels of classification