



State of Illinois
Department of Central Management Services

DATA CLASSIFICATION & PROTECTION POLICY

Effective December 15, 2008

Revised: January 03, 2012

Version 2.0

State of Illinois
Department of Central Management Services
Bureau of Communication and Computer Services

**DATA CLASSIFICATION AND
PROTECTION POLICY**

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APPROVAL SHEET

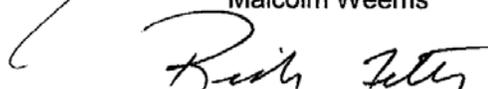
CMS Acting Director:



Malcolm Weems

Date: 1/27/12

CMS/BCCS Deputy
Director:



Rich Fetter

Date: 1/23/12

CMS/BCCS Deputy
General Counsel:



Daymon Ruttenberg

Date: 1/24/2012

CMS/BCCS Chief
Information Security
Officer:



Rafael Diaz

Date: 1/23/12

Please Return to: CMS/BCCS
Chief Information Security Office
120 W. Jefferson
Springfield, IL 62702

Thank You.

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POLICY STATEMENT

The State of Illinois, Department of Central Management Services, Bureau of Communications and Computer Services (CMS/BCCS) will maintain a data classification and protection schema designed to enable the protection of data from unauthorized disclosure, use, modification, or deletion. The determinations to be made in accordance with this policy are subject to the requirements of state or federal law, rules, or regulations.

PURPOSE

The purpose of this policy is to inform State of Illinois data owners and data users about the data classification and protection schema used by CMS/BCCS for protecting data generated, accessed, transmitted and stored by State of Illinois resources; and to promote compliance with local, state, and federal regulations regarding privacy and confidentiality.

SCOPE

This data classification policy is applicable to all structured and unstructured data generated, accessed, transmitted or stored on systems and networks managed by CMS/BCCS.

DEFINITIONS

Definitions for terms used in this policy can be found in the BCCS Terminology Glossary located at <http://www.bccs.illinois.gov>. The terms and definitions listed below are meaningful for this policy. In the event of conflict between the definition in the BCCS Terminology Glossary and the definition contained in this policy, the definition below shall control for this Policy.

1. **Data Owner** – the individual(s) responsible for or knowledgeable about how information is generated, created, acquired, transmitted, stored, deleted, or otherwise processed.
2. **Data User** – the individual(s), organization or entity that interacts with data for the purpose of performing an authorized task.
3. **System Owner** – the individual(s) responsible for the maintenance and support of the system where the data is generated, accessed, transmitted or stored.
4. **Structured Data** – data associated with a business application or system. Data that resides in fixed fields within a record or file. Relational databases and spreadsheets are examples of structured data.
5. **Unstructured Data** – data not associated with a business application or system. Data that does not reside in fixed locations. Examples are word processing documents, PDF files, e-mail messages, blogs and web pages.

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RESPONSIBILITY

1. In order to implement this policy, CMS may establish procedures and assign responsibility to specific personnel. Each Agency may also establish procedures and assign responsibility to specific agency personnel to achieve policy compliance.
2. The Data Owner is responsible for:
 - a. determining the appropriate classification (as defined below) of information generated by the owner or agency;
 - b. communicating the information classification when the information is released outside of the agency or the State of Illinois;
 - c. communicating the information classification to CMS/BCCS and the Resource Custodian so that they may provide the appropriate levels of protection.
3. Data Owners and Data Users are responsible for using structured and unstructured data in compliance with this policy.
4. The Data Owner is responsible for ensuring the appropriate security and protection protocols are in place.
5. CMS/BCCS is responsible for the overall security of the CMS/BCCS managed hosting environment.
6. It is an affirmative obligation of each individual to report violations of this policy to their supervisors or agency executives.

POLICY

1. CMS/BCCS classifies data into one of the following three categories:
 - a. Public
 - b. Official Use Only
 - c. Confidential
2. All data must be adequately protected based on the existing statutory regulations and the applicable industry principles – e.g., HIPAA, PCI, FTI, and PII – as defined by the Data and System Owners, in concert with CMS/BCCS.
3. Agencies must classify each information technology (“IT”) system by category according to the most confidential data that the IT system stores, processes, or transmits.
4. All Data must be retained and destroyed in accordance with the State Records Act.

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DATA CLASSIFICATION AND PROTECTION SCHEMA

1. PUBLIC DATA

Public Data is information that may or must be open to the general public. It is defined as information with no existing local, state, national or international legal restrictions on access or usage. Public data, while subject to State of Illinois disclosure rules, is available to all residents of the State of Illinois and to all individuals and entities external to the State of Illinois.

2. OFFICIAL USE ONLY DATA

Official Use Only Data is information that must be guarded due to proprietary, ethical, or privacy considerations, and must be protected from unauthorized access, modification, transmission, storage or other use. This classification applies even though there may not be a civil statute requiring this protection. Official Use Only Data is information that is restricted to certain employees of the State of Illinois who have a legitimate purpose for accessing such data. Data Owners may designate data as Official Use Only.

3. CONFIDENTIAL DATA

Confidential Data is information protected by statutes, regulations, State of Illinois policies, or contractual language.

Disclosure to parties outside the State of Illinois should be authorized by executive management and/or the Data Owners and General Counsel. Disclosure of Confidential Data internal to the State of Illinois should be on a need-to-know basis only.

Confidential data includes any data of which the inappropriate disclosure could have a material adverse effect on State of Illinois interests, the conduct of agency programs, or the privacy to which individuals are entitled.