

## Data Storage Guidance

Data Classification	Data Examples	Public Records status under General Statutes of North Carolina	Storage Requirement Examples
<p><b>High Risk</b> Data with a known protection or disclosure standard whose release to an unauthorized person would be a violation of Federal or State laws, and would potentially result in criminal penalties. Some examples include SSN data, data covered by Health Insurance Portability and Accountability Act (HIPAA), The Federal Information Security Management Act (FISMA), the North Carolina Identity Theft Protection Act, and data covered by Payment Card Industry (PCI) compliance requirements.</p>	<ul style="list-style-type: none"> <li>• Social Security Numbers</li> <li>• Protected health Information (HIPAA)</li> <li>• Passport data</li> <li>• Tax ID numbers</li> <li>• Banking information and Credit/PCI Card Information</li> <li>• Veterans Administration data</li> <li>• North Carolina Identity Theft Protection Act</li> <li>• Research data designated High Risk by IRB or terms of grant or contract in compliance with Federal and State laws</li> </ul>	Non-Public	<p>3-Lock</p> <p>These data may reside only in systems of record. They may reside in appropriate locations within Banner or secure HR systems, or within appropriate health records systems, but never in other storage locations (such as desktop, USB or cloud storage).</p> <p><u>Special Note on PCI Data:</u> The University does not permit storage of payment card data within any University system or storage, including all local storage and all cloud storage. Further, payment card information may never be sent or received via electronic mail and may not be retained by the University.</p>
<p><b>Moderate Risk</b> Data not covered by one of the known protection or disclosure standards listed under High Risk whose loss, corruption, or unauthorized disclosure would constitute a violation of Federal or State laws, and would potentially result in civil penalties. Some examples include certain types of grant-funded research data, data deemed confidential in contract agreements, Family Educational Rights and Privacy Act (FERPA) data, and Banner Internet Native Banner data (excluding SSN and other data as designated in High Risk).</p>	<ul style="list-style-type: none"> <li>• Student data not designated directory information under FERPA</li> <li>• Personally identifiable information such as name, birthdate, address, employee ID where held in combination, potentially leading to identity theft or other misuse</li> <li>• Personnel data</li> <li>• Research data if specified as Moderate Risk by IRB or terms of grant or contract in compliance with Federal and State laws, or proprietary research</li> <li>• Building or other infrastructure schematics</li> </ul>	Public in some cases	<p>2-Lock</p> <p>These data may be stored only in University-provided network drive space or Box cloud storage. Google Drive, workstation or other storage are not appropriate storage locations for these data. Care should be taken to insure that access to data stored in these locations is limited to individuals authorized to access such data.</p>
<p><b>Low Risk</b> Data not designed for public dissemination, but not falling in the “High Risk” or “Moderate Risk” categories.</p>	<ul style="list-style-type: none"> <li>• Budget and salary information</li> <li>• Departmental policies and procedures</li> <li>• Internal memos</li> <li>• Research data not subject to specific confidentiality requirements from IRB or other agency</li> </ul>	Public	<p>1-Lock</p> <p>These data may be stored only in University-provided network drive space, Box or Google Drive cloud storage. Care should be taken to insure that access to data stored in these locations is limited to individuals authorized to access such data.</p>
<p><b>Minimal Risk</b> Data designed for public dissemination.</p>	<ul style="list-style-type: none"> <li>• Catalogs and bulletins.</li> <li>• Product and service information</li> <li>• Directory listings</li> <li>• Published research</li> <li>• Presentations or papers</li> <li>• Job postings</li> <li>• Press releases</li> <li>• Training designed for public consumption</li> </ul>	Public	<p>1-Lock</p> <p>There are no storage limitations associated with these data. They may be stored locally and in Google Drive.</p>