



POLICY AND PROCEDURE

Policy Name: Data Classification	Effective Date: 07/04/2016
Policy Number: 1011	Revision Date: 08/01/2019
Department: Administration	Author: Daniel Mos

PURPOSE: Under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), a set of privacy and security requirements were established to protect certain health information. The regulations define protected health information (PHI) and standards for protecting this information including how it is held or transferred in electronic form. Due to these regulations, this policy classifies UnifyHR data into sensitive and non-sensitive data and establishes standards for transmitting sensitive data.

POLICY:

Data Classifications

UnifyHR has two general classifications of data, both of which are functions of the degree to which the data are; i.) Personally Identifiable Information (“PII”), ii.) Protected Health Information, (“PHI”) and iii.) due to its nature, subject to our clients’ reasonable expectations of confidential treatment.

The two classifications are “Sensitive” and “Non-Sensitive”. Due to the inherent lack of control UnifyHR can exercise over client transmittals of data, this document addresses only outbound communication of client data.

Sensitive Data

UnifyHR treats as Sensitive any PII, PHI, and other client data not expressly described by the client as Non-Sensitive.

Sensitive data always requires encryption. Encryption of system generated messages or data is accomplished within the application. Each employee transmitting Sensitive data must utilize Sharefile encryption tools to encrypt email attachments.

The process includes a standing requirement that transmitting external employees’ email(s) include disclaimer(s). The disclaimers include an advisory that:

- Any unintended recipient destroys or delete the included / attached data,
- Any unintended recipient informs the transmitting employee of the unintended communication, text replicated below
 - General Use: “This communication, including all attachments, is intended only for the recipient(s) named above, may be confidential and/or legally privileged, and, must be treated as such in accordance with state and federal laws. If you are not the intended recipient, you are hereby notified that any use of this communication, or any of its contents, is prohibited. If you have received this communication in error, please reply to the sender and then delete the communication, and all attachments, from your computer system immediately.”



Non-Sensitive Data

UnifyHR communicates Non-Sensitive data, including general correspondence, without encryption. The transmitter often utilizes the standard disclaimer in all email communication. The text from the disclaimers is replicated above. Client specific non-sensitive data is not shared with third parties without explicit consent from the client.

This policy shall be reviewed for language and application on an annual basis following its last revision and shall be reviewed every year thereafter.

Revision History

Version	Date	Author	Summary of Changes
1.0	12/15/2015	Daniel Mos	Original
1.0	07/05/2017	Daniel Mos	Reviewed – No Changes
1.0	07/27/2018	Daniel Mos	Reviewed – No Changes
1.1	10/25/2018	Jennifer Shaub	Added Purpose Statement
1.2	07/31/2019	Jennifer Shaub	Removed second disclaimer, specified disclaimer is sent externally, and modified non-sensitive data section

Approvals

Version	Date	Approver	Summary of Changes
1.0	07/04/2016	Chris Heinefield Craig Firestone	Original
1.0	07/05/2017	Chris Heinefield Allen Gehrki	Reviewed – No Changes
1.0	07/27/2018	Chris Heinefield	Reviewed – No Changes
1.1	10/26/2018	Daniel Mos	Added Purpose Statement
1.2	08/01/2019	Daniel Mos	Removed second disclaimer, specified disclaimer is sent externally, and modified non-sensitive data section