Data Classification Policy

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| --- | --- |
| **Company** | Guatemaltek |
| **Version** | 1.0 |
| **Effective Date** | 2026-01-01 |
| **Review Schedule** | Annually |
| **Responsible Officer** | CISO |

# Purpose

Establishes data classification framework to ensure appropriate protection based on sensitivity and business value.

# Scope

All Guatemaltek data in any format: electronic, paper, verbal communication.

# Policy

## Classification Levels

* Marketing materials, public website content, job postings
* Handling: No restrictions
* Storage: Any location
* Transmission: Any method
* Disposal: Standard deletion/recycling
* Internal procedures, org charts, internal communications
* Handling: Guatemaltek personnel only
* Storage: Company approved systems
* Transmission: Encrypted for external transmission
* Disposal: Secure deletion/shredding
* Customer data, employee PII, financial records, contracts, source code
* Handling: Authorized personnel only, need-to-know
* Storage: Encrypted company systems only
* Transmission: Encryption required
* Access: MFA required, logged and audited
* Labeling: Mark as "CONFIDENTIAL"
* Disposal: Certified secure destruction
* Passwords/credentials, encryption keys, trade secrets, M&A information
* Handling: Strictly limited access, specific authorization
* Storage: Encrypted with strong controls
* Transmission: Encrypted only, secure channels
* Access: MFA mandatory, all access logged and reviewed
* Labeling: Mark as "RESTRICTED - DO NOT DISTRIBUTE"
* Disposal: Certified secure destruction with certificate

## Handling Requirements Matrix

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Requirement** | **PUBLIC** | **INTERNAL** | **CONFIDENTIAL** | **RESTRICTED** |
| \*\*Encryption (at rest)\*\* | No | Recommended | Required | Required (strong) |
| \*\*Encryption (in transit)\*\* | No | For external | Required | Required |
| \*\*MFA\*\* | No | No | Recommended | Required |
| \*\*Access Logging\*\* | No | No | Required | Required + Review |
| \*\*Labeling\*\* | No | No | Required | Required |
| \*\*DLP Monitoring\*\* | No | No | Recommended | Required |
| \*\*Secure Disposal\*\* | No | Yes | Certified | Certified + Log |

## Classification Process

1. Data Owner classifies data upon creation
2. Apply appropriate labels/markings
3. Review classification when data changes significantly
4. Annual review of CONFIDENTIAL/RESTRICTED data
5. Declassify when sensitivity decreases (with approval)

## Responsibilities

# Compliance

Approved: CISO | 2026-01-01 | Next Review: 2027-01-01