| Classification Level | Risk Level   | Description   | Access Rights                       | Breach Impact   | Examples  | Audit Controls  | Storage Options   | Security Measures  | Compliance and Regulations  |
|----------------------|--------------|---|-------------------------------------|---|---|---|---|--|---|
| Public               | Minimal risk | Data is not sensitive and can be<br>shared publicly. Data will cause<br>no harm to Falconi or its clients         |                                     | No impact   | Publicly announced     new clients  | None Required   | Public cloud storage or website<br>CMS  | Basic integrity checks and version control               | None Required   |
| Internal             | Low risk     | Data is intended for internal<br>Falconi use only. Disclosure<br>could cause operational or<br>reputational harm. | Internal use only                   | Minor operational<br>disruption                         | Recruitment and signing procedures Internal staff schedules Staff contact directory Internal memos Falconi-Branded templates and digital assets | Log review (SIEM tools),<br>Quarterly IT Audits                                 | Internal file server or cloud<br>platform with employee-only<br>access        | Password-protected access,<br>endpoint security, logging | Internal Policies     SPARTA (training materials)   |
| Confidential         | Medium risk  | Sensitive data that should only be accessed on a need-to-know basis.  | Restricted<br>(need-to-know)        | Moderate damage to<br>business or reputation            | Onboarded 'pending' clients  Contracts in discussion  Draft offers  Athlete PII   | Quarterly audits by<br>governance board and data<br>access reviews              | Secure encrypted cloud drives or internal document management systems         | Encryption (AES-256), access<br>logs, MFA                | Internal Policies SPARTA (FTC) NFLPA Rules CCPA (PII Baseline)  |
| Restricted           | High risk    | Highly sensitive data with legal<br>or financial consequences if<br>disclosed.                                    | Highly Restricted<br>(need-to-know) | Severe impact including<br>legal or financial penalties | Athlete salaries Athlete brand deal partnerships Athlete health information Athlete SPII  | 24/7 SIEM, real time alerts,<br>monthly internal reviews,<br>third-party audits | Encrypted storage on highly<br>restricted cloud drives with<br>access control | MFA, encryption at rest and<br>transit, DLP tools        | Internal Policies SPARTA (FTC) NFLPA Rules GDPR (Data Collection of European Residents) HIPPA (not covered entity, but baseline) CCPA (PII and SPII baseline) |

