
**Information technology — Governance
of data —**

**Part 3:
Guidelines for data classification**

*Technologies de l'information — Gouvernance des technologies de
l'information —*

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Foreword

ISO (the International Organization for Standardization) and IEC (the International Electrotechnical Commission) form the specialized system for worldwide standardization. National bodies that are members of ISO or IEC participate in the development of International Standards through technical committees established by the respective organization to deal with particular fields of technical activity. ISO and IEC technical committees collaborate in fields of mutual interest. Other international organizations, governmental and non-governmental, in liaison with ISO and IEC, also take part in the work.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of document should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see www.iso.org/directives or www.iec.ch/members_experts/refdocs).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO and IEC shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see www.iso.org/patents) or the IEC list of patent declarations received (see <https://patents.iec.ch>).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT) see www.iso.org/iso/foreword.html. In the IEC, see www.iec.ch/understanding-standards.

This document was prepared by Joint Technical Committee ISO/IEC JTC 1, *Information technology*, Subcommittee SC 40, *IT Service Management and IT Governance*.

A list of all parts in the ISO/IEC 38505 series can be found on the ISO and IEC websites.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at www.iso.org/members.html and www.iec.ch/national-committees.

Introduction

This document complements the existing International Standards on IT governance (ISO/IEC 38500) and data governance (ISO/IEC 38505-1). It is designed to provide practical guidance for organizations including governing bodies and management to allow them to:

- maintain an oversight of their data portfolio,
- understand the business context, value, sensitivity and risk associated with the data, and
- apply mechanisms that are both proportionate and appropriate, ensuring that data is protected, and is only used for intended purposes consistent with the organization's obligations.

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Information technology — Governance of data —

Part 3: Guidelines for data classification

1 Scope

This document provides essential guidance for members of governing bodies of organizations and management on the use of data classification as a means to support the organization's overall data governance policy and associated systems. It sets out important factors to be considered in developing and deploying a data classification system.

2 Normative references

There are no normative references in this document.

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <https://www.electropedia.org/>

3.1

big data

extensive datasets, primarily in the data characteristics of volume, variety, velocity and/or variability, that require scalable technology for efficient storage, manipulation, management and analysis

Note 1 to entry: Big data is commonly used in many different ways, for example as the name of the scalable technology used to handle big data extensive datasets.

[SOURCE: ISO/IEC 20546:2019, 3.1.2, modified.]

3.2

customer data

data held on file about customers

Note 1 to entry: This comprises the information customers provide while interacting with the organization via their website, mobile applications, surveys, social media, marketing campaigns and other online and offline avenues.

3.3

data controller

person or organization who determines the purposes for which and the manner in which any data are to be processed, stored and used

[SOURCE: ISO 10667-1:2020, 3.10, modified.]

3.4

data processor

person [other than an employee of the *data controller* (3.3)] or organization that processes the data on behalf of the data controller.

[SOURCE: ISO 10667-1:2020, 3.11, modified.]

3.5

data quality owner

senior level employee accountable for the quality of one or more datasets

3.6

data sensitivity

property of data that reflects the potential harm of unauthorized disclosure

Note 1 to entry: The potential harm is to an individual or organization.

Note 2 to entry: Different levels of data protection can be used to account for varying levels of data sensitivity.

Note 3 to entry: Data sensitivity can be applied to specific categories of data such as healthcare, finance, *personal data* (3.12).

3.7

data sharing

access to or processing of the same data by more than one authorized entity

3.8

data stakeholder

natural or legal person that can affect, be affected by, or perceive themselves to be affected by a decision or activity related to the processing of data

3.9

data steward

role within an organization responsible for ensuring that data-related work is performed according to policies and practices as established through data governance (2021)

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Note 1 to entry: Typically, data stewards are responsible for business controls, data content and meta-data management related to a set of data assets, utilizing an organization's data governance processes to ensure fitness of data elements, both the content and metadata.

[SOURCE: ISO/TR 14872:2019, 3.5, modified.]

3.10

data taxonomy

scheme for organizing data based upon relationships and common characteristics

Note 1 to entry: A data taxonomy can include data categorization and data classification; it represents a convenient way to organize data.

3.11

organizational data

class of data objects under the control, by legal, contractual or other reasons, of an organization.

Note 1 to entry: Organizational data are all business information and data that are accessed, collected, used, processed, stored, shared, distributed, transferred, disclosed, destroyed or disposed of by any of the business units. Organization data can include, for example, financial records, business strategy documents, governing body and governance papers, staff information (employees, contractors, consultants), business analysis and intelligence, and executive information.

Note 2 to entry: Organizational protected data, or OPD, is organizational data for which protection is required based on the policies established by the governance of data process.

Note 3 to entry: Organizations have policies that govern the data under their control. ISO/IEC 38505-1 identifies and examines higher level governance concerns regarding the use of data which is relevant from the perspective of governance of data.

Note 4 to entry: Organizational data can contain OPD and PII.

[SOURCE: ISO/IEC 19944-1:2020, 3.4.2, modified.]

3.12

personally identifiable information

PII

personal data

any information that (a) can be used to establish a link between the information and the natural person to whom such information relates, or (b) is or can be directly or indirectly linked to a natural person.

Note 1 to entry: The “natural person” in the definition is the *PII principal* (3.13). To determine whether a PII principal is identifiable, account should be taken of all the means which can reasonably be used by the privacy stakeholder holding the data, or by any other party, to establish the link between the set of PII and the natural person.

[SOURCE: ISO/IEC 29100:2011/Amd1:2018, 2.9, modified.]

3.13

PII principal

natural person to whom the *personally identifiable information (PII)* (3.12) relates

Note 1 to entry: Depending on the jurisdiction and the particular PII protection and privacy legislation, the synonym “data subject” can also be used instead of the term “PII principal”.

[SOURCE: ISO/IEC 29100:2011, 2.11]

3.14

semi-structured data

aggregate datatype whose components' datatypes and their labels are not pre-determined

Note 1 to entry: Semi-structured data are forms of *structured data* (3.15) that do not follow the formal structure of data models related to relational databases or other forms of databases.

Note 2 to entry: Examples of semi-structured data include the data that contain HTML tags or other markers to separate semantic elements and to represent hierarchies of records and fields within the data.

[SOURCE: ISO/IEC 20944-1:2013, 3.21.12.21, modified.]

3.15

structured data

data which are organized based on a pre-defined (applicable) set of rules.

Note 1 to entry: The predefined set of rules governing the basis on which the data are structured needs to be clearly stated and made known.

Note 2 to entry: A pre-defined data model is often used to govern the structuring of data.

Note 3 to entry: Examples of structured data are the data contained in relational databases.

[SOURCE: ISO/IEC 20546:2019, 3.1.35, modified.]

4 Foundations

4.1 Context

4.1.1 The data deluge

As organizations create, process and share ever more data, they run the risk of being overwhelmed by a data deluge. Due to rapid growth in global data volumes, any attempted quantification risks becoming quickly obsolete; nevertheless, some indications are available.

The World Economic Forum (WEF) has estimated that the global volume of data will double between 2018 and 2022 and with then double again within 3 years. Currently, much of this growth is driven by searches (5 billion per day) and social media platforms (Twitter: 456 thousand tweets every minute), while future growth is expected to be driven mainly by new data scenarios, especially those related to big data, artificial intelligence (AI) and Internet of Things (IoT).

As data has proliferated, it has become a key enabler for the effective operations of all organizations and critical for effective decision-making by both managers and governing bodies. The pervasiveness of data in organizations today mandates the governance of data as an organizational imperative.

As a consequence, managers and governing body members should seek to better acquaint themselves with the potential value, risk and constraints associated with data.

4.1.2 The strategic value of data

More and more organizations understand that data constitutes a strategic asset which has financial and non-financial value, and which can be used in turn to generate additional value for the organization. Hence the focus on enabling organizations to leverage the value of their data without incurring data/privacy breaches, unethical use, disclosing intellectual property, or having its data misappropriated or misused.

Each organization should consider the data opportunity relative to its strategic context, the nature of the data in its custody, and the risk appetite as defined by the organization's governing body.

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4.1.3 The risks associated with data

While data presents an organization with strategic, value-generating opportunities, it can also pose significant threats. Data can be exposed to inappropriate or illegal access and used for illegal purposes. It can be lost and, as a result, expose natural and legal persons to threats against them. It can even be used against the organization itself in anti-competitive, unethical, or illegal ways.

Each organization should consider the threats posed by data in its care, assess the risks and take steps to appropriately address these risks.

4.1.4 Consequences of failure

Ineffective data stewardship by the organization can present very real threats to the organization. Examples include:

- a) Data breach litigation: with potentially significant penalties, including legal prosecution and financial penalties. The full cost of a data breach can last for months or even years.
- b) Critical failure: disclosure of information, for example via a data breach, that can result in financial loss, the failure of critical infrastructure or, in the most serious cases, to loss of life.
- c) Reputational risk: reputation matters in many ways, for example, the ability to recruit top talent or to retain the trust of customers, regulators, investors and other stakeholders.

- d) Under-performance: poor data stewardship by the organization can lead to under-performance of the organization and put it at a disadvantage relative to peers or competitors.

4.2 Data classification

There are many ways to organize data. A data taxonomy organizes data into various groups or hierarchies based on a desired facet of data. For example, data can be organized into sub-groups based on the nature of what the underlying data describes (data categories), or based on geo-location of data, or the level of de-identification performed on the data, or on the legal means of control over the data.

Another important facet of data is its level of classification. The classification level describes the significance or sensitivity of the data, from the perspective of an organization. For example, it can be described as N levels of significance (N being scenario-specific). Data sensitivity, and its associated degree or level, is determined by the purpose and context of the organization and relates to the potential value, risk and constraints of the data. Different classifications allow the organization to have differentiated policies and associated controls and costs based on the data's significance. This ensures each class of data receives the appropriate treatment (e.g. level of security controls or compliance requirements).

See ISO/IEC 19944-1 for a description of a multi-faceted data taxonomy, where data classification is one such facet. ISO/IEC 19944-1 describes how data classification is an important facet in an otherwise broader, multi-faceted taxonomy of data. It is important to note the distinction between data classification and data categorization; the latter refers more to the nature of the data. Some examples that illustrate this distinction are shown in [Table 1](#).

Table 1 — Distinguishing data classification and data categories

Data category: examples	Data classification: examples
Customer data, e.g. identity data, descriptive data	High business impact (HBI), medium business impact (MBI), low business impact (LBI).
Aggregated data, e.g. summary statistics	Confidential, restricted, internal use, public
Derived data, e.g. telemetry	
Anonymized data, so that it is impossible to re-identify an individual	
Structured data, e.g. stored in a structure such as a database	

4.3 Purpose of classification:

Data classification provides a means for the organization to objectively distinguish between different datasets, so as to indicate the significance of the data and to allow differentiated policies and controls consistent with the significance of the data and with its compliance obligations. Data classification is a fundamental requirement for many effective data stewardship activities in an organization.

Some examples of policies and controls that can be applied differently to different classification levels include:

- Data Protection:** This ensures that a risk-based approach is taken for each different classification of data such that treatments are appropriate, cost effective and enable the achievement of the organization's strategic objectives.
- Compliance:** Applying the correct compliance processes for each classification helps to ensure the policies and controls for that level are correctly implemented.
- Intended use:** A core tenet of data stewardship is that data is used only for legitimate and agreed purposes. That means that data can be used or processed only for the purpose explicitly stipulated in an agreement with, and under the parameters defined in, the data agreement. Data classification provides a useful mechanism that ensures that definitive and unambiguous details are assigned to