Making Data Classification
Work for Your Program

Deborah Butler, Esq.
What is Information Governance?

Why Does Information Governance Matter?

“Information governance is the activities and technologies that organizations employ to maximize the value of their information while minimizing associated risks and costs.” *

- Foundation for all things involving data management
  - Policy and program

- Holistic, multi-disciplinary and cross-company approach
  - Supports/drives holistic data strategies

- Data universe is more than records > start with data classification: framework for organizing information for its protection, management and disposition

What is Data Classification?

Why Does Data Classification Matter?

Data classification = method of identifying information to indicate handling instructions

- Data classification standard = implementation of information governance policy
- All data management/protection initiatives = implementation of policy

➢ Efficient data management (e.g., IT deployments, litigation preparedness)
➢ Increased employee productivity
➢ Increased employee awareness
➢ The biggie: Increased data protection
Data Threats, By the Numbers

$3.5M

Average spend for companies to investigate, notify and respond to a data breach in 2014*

$300B

Annual cost/losses for U.S. companies due to corporate espionage including intellectual property theft*

46%

The percentage of IT security leaders whose companies have a common process in place to discover and classify on-premise confidential data*

The Age-Old Challenge of Protection vs. Availability

Balancing Act
Protection vs. Availability

- Executive Support
- Cross-Functional Team Involvement
- User Awareness and Empowerment
- Policy Enforcement

Changing Risk Profile
Porous Perimeters
Threat Landscape

Information governance = holistic platform for balancing
Chad, an in-house advertising attorney for MINE-X, is meeting with his client, Portia, a corporate marketing executive, about the company’s recently proposed data classification standard. (MINE-X is a global advertising firm that also provides Big Data/data mining analytics services for its customers.) All the company’s in-house attorneys have been asked to gather feedback from their clients regarding the standard and report out this feedback to the IT Department. Their meeting follows.
Developing a Data Classification Standard – Job Aids

- **Top Considerations**

- Purpose(s) of standard

- Will labels/categories be directive, intuitive, aspirational?

- Will categories represent company mission and culture?

- Any other objectives at play? For example:
  
  > Replacing another standard > prevent confusion?

  > Merging with another company

  > Anticipate new data types or different operations?
## Data Classification Standard - DRAFT

<table>
<thead>
<tr>
<th>Public</th>
<th>Internal Use</th>
<th>Customer</th>
<th>Special Protection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>M&amp;A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>IP</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Employee Health Information</td>
</tr>
</tbody>
</table>
Building Data Classification Awareness

- Tools
- Communications
- Training
- A few thoughts:
  - Whether data classification is part of company’s overall data management/protection strategy
  - Re-consider role of data classification in company’s strategy
  - Re-consider employee’s role in company’s data management/protection strategy
  - Communicate those decisions/considerations
    - Early and often > consider benchmark metrics
    - Did you move the needle with comms? Did you build awareness? Change behavior? Increase adoption?
- Real-Life Organizational Change Management Example (Dell)
DELL’s Business Issue

Transformation from hardware seller to end-to-end IT solutions and services provider

Further integration of information management best practices > enhancing company’s information management culture

Persistent threat to confidential information including intellectual property

Your Company Here
DELL’s Data Protection Goals

CLASSIFICATION = ONE STEP IN DELL’S DATA PROTECTION STRATEGY

- Know what DELL has so it can be managed
- Define DELL’s data classification labels
- Educate and train team members
- Deploy classification technical controls to DELL team members
- Develop DELL’s data classification standard
Why Data Classification at Dell

Enabled DELL’s implementation of its data classification standard

Empowered team members to classify information for appropriate handling

Enabled the classification of information that DELL’s team members typically handle

Set the foundation for future data protection initiatives, e.g., DLP (data loss prevention)

Enabled the continuation of building team member data protection awareness

Set the foundation for classification enforcement

Component of DELL’s Information Governance/Data Protection Journey
DELL’s Data Classification Journey

1. Verify the Problem
2. Establish & Implement Policy and Standard
3. Conduct Focus Group Testing
4. Build End User Awareness & Involve Users in Data Protection
5. Deploy DLP and Other Technical Controls
Driving Cultural Change with Data Classification

SENSITIVITY TO END USER EXPERIENCE/CHANGES

MULTI-LEVEL CONSENSUS BUILDING

Executive pilot

Team member focus groups

MEETING CORPORATE REQUIREMENTS

Business

Legal

EVERGREEN (FLUID, EVOLVING) PROCESS
# Data Classification Labeling Tool – Comms Plan

<table>
<thead>
<tr>
<th>January - Get Ready</th>
<th>February - Be Ready</th>
<th>March - Get Trained</th>
<th>April - Start Labeling</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Communication to employees to introduce data labeling tool concept</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication targeted to executives to ask for participation in tool pilot</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Training for executives deployed and recorded for tool executive pilot</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication targeted to employees to encourage them to watch recorded training as needed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication to employees on success of executive pilot</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication to employees on upcoming required tool training dates</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Training deployed to employees</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication on tool demos</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication on open support dates</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Training ongoing to employees</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication to employees on tool launch dates per region, reminder of recorded training and additional resources on tool support center (microsite)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication targeted to executives to ask for participation in tool pilot</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication to employees to introduce data labeling tool concept</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Communication targeted to employees to ask for participation in tool pilot</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

[ARMA International](https://www.armainternational.org) | [ARMA Northern New Jersey](https://www.armanj.org) | [ARMA Connecticut Chapter](https://www.armaconn.org) | [ARMA Long Island Chapter](https://www.arma-nych.com)
DELL’s TITUS Deployment Schedule

- December: Focus Group Testing
- April: Exec Pilot
- June: Global Employee Training
- August: Corporate Deployment
DELL’s Multi-Layer Communications/Training Plan

**KEY**
Holistic organizational change management strategy

- Regular communications
- Self-study training videos posted on “TITUS Support Center” webpage
- Global in-person social events to promote deployment (15 sites worldwide)
- Badge card with classification labels and tool information
- Open support sessions 2x weekly (in 2 time zones) to support training
- Use of social media to share user experiences
The Road Ahead...

- DLP Interlock
- Encryption Interlock
- Favorites
- ENDPOINTS/MOBILE/BYOD
- Emerging Technologies
- Successful Deployment
- Increasing Team Member Maturity
Thank You!!

Deborah Butler, Esq.
dbutleresquire@gmail.com
215-688-6626