

CLASSIFICATION AND LABELING OF COMPANY INFORMATION

Overview

Information is one of _____ (“Company”)’s most valuable assets. For the corporation to remain successful, this asset must be securely protected from loss, theft or misappropriation. Examples of data which should be protected include any information which could give Company a competitive advantage, trade secrets, proprietary product source code, copyrighted technical material, business plans and strategies, corporate financial information, employee personnel data, organizational structure, etc.

Implementation of a formal classification system will help ensure Company’s information assets are protected.

Purpose

This policy provides guidelines for classifying and labeling various levels of confidential and/or proprietary information at Company. Implementation of this policy will ensure that only individuals with a “need to know” will have access to confidential or sensitive Company information.

Questions concerning the proper classification of a specific piece of information should be referred to individual managers.

Please note that, in addition to Company-created information, confidentiality may also apply to information provided to Company by third parties. While Company is usually obligated to treat such information as confidential under a Non-Disclosure Agreement, because these restrictions are based on contract obligations rather than Company policy, this document does not address the use and disclosure of third-party information. If you have any questions regarding how to treat third-party confidential information, please refer to our Code of Conduct or the Guidelines pertaining to Non-Disclosure Agreements.

Scope

This policy applies to all Company employees, contractors, consultants, temporary hires, and other workers at Company, including all personnel affiliated with third parties. This policy applies to all information media formats, including but not limited to, electronic, digital, printed material, owned or produced by or for Company.

Policy

1. Requirements for Individuals Creating Information

Individuals who create or compile information are required to mark all confidential information with the “COMPANY CONFIDENTIAL,” “CONFIDENTIAL INFORMATION OF COMPANY SYSTEMS, INC,” or “COMPANY HIGHLY CONFIDENTIAL INFORMATION” legend, or other similar legends or markings.

The [table below](#) provides some examples of the different types of information.

2. Classification Markings

Classification markings on printed material and slide presentations must appear prominently on the cover sheet, and on every sheet or slide contained in the document. Markings on electronic/digital media must be clearly indicated on the outside of the distribution device (cd-rom, diskette, tape, or other digital media format, etc.), and as a header at the beginning of the written contents. Markings on source code should be commented at the beginning of the code. Web content classification must be marked visibly on the web page within the browser window. The classification level of all materials must be both obvious and easily discernible to the casual observer. If possible, markings should be in color.

3. Restrictions on Providing Information to Third Parties

- **Company** non-confidential material may be provided to third parties without restrictions.
- **Any and all Company Confidential** material may only be provided to a third party with the approval of a Company director or above and under a Non-Disclosure Agreement signed by the third party and a Company director or above. See guidelines pertaining to NDAs.

The Company employee disclosing the material (the “Third Party Liaison”) is responsible for verifying that a Non-Disclosure Agreement has been signed with the third party and that the required approvals are obtained prior to disclosing the material.

The Company Third Party Liaison is responsible for ensuring that the information provided to a third party (including third parties temporarily located on Company premises) is properly marked. The Third Party Liaison should also keep a record of the identity of organizations given information and the nature of such information. Finally, many Non-Disclosure Agreements require that any confidential information that is disclosed orally must be summarized in writing and sent to the third party in a written document marked with the appropriate confidentiality legends. The Third Party Liaison should endeavor to comply with this requirement if confidential information is disclosed orally in presentations or teleconferences.

Upon termination of the project or relationship with the third party, the Company Third Party Liaison should make a written request for the return or destruction of all Company

confidential information. Company's right to require the return or destruction of our information is usually based on the Non-Disclosure Agreement or other contract with the third party.

4. Storage and Protection Requirements

Any printed hard copies or electronic media storage devices (cd-rom, diskette, tape, or other digital media format, etc.) containing classified information must be stored in a locked file cabinet or similarly secured location. IOS source code, for example, should be both password protected and on read-only servers.

Appropriate online password protection must be implemented for the various levels of sensitive information, concomitant with the degree of security required.

Never share confidential information with another individual (including other Company employees) unless you have previously verified they have a valid need for access to the material.

EXAMPLES OF CONFIDENTIAL INFORMATION

	Examples	3rd Party Restrictions
Non-confidential Information	<p>Overall number of Company employees</p> <p>Information in published SEC filings</p> <p>Job descriptions and openings</p> <p>Information found on non-password protected pages of the Company Connection Online (CCO), etc.</p>	Information can be made freely available.
Company Confidential Information	<p>Business plans</p> <p>Technical data</p> <p>Source Code</p> <p>Product specifications</p> <p>Inventions</p> <p>Employee lists/records</p> <p>Marketing plans</p> <p>Financial analyses</p> <p>Customer lists/records</p> <p>Products being developed</p> <p>Future product plans</p> <p>Agreements /Discussion or relations with other parties</p> <p>Internal policies and procedures</p>	Company Confidential information can be provided to a third party only after a non-disclosure agreement has been signed by a Company director or above