

Category	Information Technologies and Services
Type	Procedure
Title	Information Security – Storage and Distribution
Approval Authority	VP, Administration and Chief Financial Officer
Implementation Authority	Chief Information Officer
Related Policy	Information Security Policy
Related Procedure(s)	Information Security – Incident Response Plan
Related Additional Information	N/A
Original Approval Date	July 18, 2017
Original Effective Date	July 18, 2017
Most Recent Revision Date	November 1, 2019
Next Review Date	November 1, 2021

PURPOSE

To set out reasonable security arrangements that must be applied to **Banff Centre Information** according to the security classification levels assigned to such information pursuant to the *Policy – Information Security Policy*.

SCOPE

Compliance with this Procedure extends to all members of the **Banff Centre Community** and to any other parties granted access to information, systems, or facilities where Banff Centre Information is handled or stored.

Following the Original Effective Date, **Banff Centre** shall have a 24 month transition period during which time it shall update its practices and procedures so as to be compliant with this Procedure by the end of the transition period except where an approved exemption (1g) exists.

PROCEDURE

1. **BANFF CENTRE INFORMATION – SECURITY CLASSIFICATION**

- a. Banff Centre Information shall be assigned to one of the following security classification categories (as such categories are defined in the *Policy – Information Security Policy*).
 - i. Public
 - ii. Internal
 - iii. Confidential
 - iv. Highly Confidential
 - v. Restricted
 - vi. Prohibited

- b. The security classification category of the Banff Centre Information establishes the extent and type of security arrangements that must be implemented to protect the Banff Centre Information. These security arrangements are set out in *Section 2 – Storage and Distribution* below.
- c. Individuals with responsibility for their area (for example, Vice-Presidents, Executive Directors, Directors and department/division heads) are expected to classify and manage the Banff Centre Information for which they are responsible based on a reasonable understanding of the overall value of the Banff Centre Information. Such understanding should comprise an awareness of, where applicable and relevant:
 - i. Legislative requirements, especially **FOIP** (*Alberta's Freedom of Information and Protection of Privacy Act*)
 - ii. Regulatory obligations
 - iii. Any relevant Banff Centre policies and procedures
 - iv. Industry standards and best practices
- d. Those individuals listed in section 1(c) above are expected to ensure that their team members understand the information security classification categories and manage Banff Centre Information according to the relevant assigned security classification categories.
- e. Security classification categories are applied to broad information types or categories, rather than individual records.
- f. Where it is unclear which security classification category is most appropriate or when dealing with large volumes of information, users of the Banff Centre Information should employ the strictest appropriate security classification category.
- g. When more time is needed to adopt a certain requirement of the Procedure, or when it is not practical or feasible to follow the direction of the Procedure, an exemption may be granted. The exemption must be approved by the VP, Administration and Chief Financial Officer, and the President and CEO. A remediation plan (as appropriate) with timeline for compliance would be included with the exemption request.

2. STORAGE AND DISTRIBUTION

- a. **Public – Low Sensitivity**
 - i. **Access:** No access restrictions
 - ii. **Storage requirements:** May be stored on **Banff Centre Community's** computers; however, storage on a Banff Centre network folder or SharePoint site is strongly encouraged. Storage on a Banff Centre approved cloud storage provider or in Banff Centre electronic mail is permitted. Use of Banff Centre approved **Software as a Service** solutions is permitted.
 - iii. **Distribution within Banff Centre:** Standard interoffice mail, electronic mail or electronic data transmission methods.
 - iv. **Distribution outside of Banff Centre:** Canada Post, approved couriers, electronic mail, or electronic data transmission methods.
- b. **Internal – Moderate Sensitivity**
 - i. **Access:** Access is limited to Banff Centre Community and other authorized users for business-related purposes. Access must be revoked as soon as reasonably possible when users leave Banff Centre or change departments.
 - ii. **Storage requirements:** May be stored on Banff Centre Community's computers, provided those computers are protected by a Strong Password; however storage on a Banff Centre network folder or SharePoint site is strongly encouraged. Storage on

laptops, tablets, smartphones, USB drives, portable hard drives, CDs, DVDs and tapes is allowed when protected with **Strong Password** or **Encryption**. Storage on a Banff Centre approved cloud storage provider or in Banff Centre electronic mail is permitted. Use of Banff Centre approved Software as a Service solutions is permitted.

- iii. **Distribution within Banff Centre:** Standard interoffice mail, electronic mail, or **Approved Electronic Data Transmission Methods**.
- iv. **Distribution outside of Banff Centre:** Canada Post, approved couriers, electronic mail, or **Approved Electronic Data Transmission Methods**.

c. **Confidential – High Sensitivity**

- i. **Access:** Access is limited to individuals in a specific function, group or role on a need-to-know basis. Access must be revoked as soon as reasonably possible when users leave Banff Centre or change departments.
- ii. **Storage requirements:** Strong Passwords are required for electronic information. **Physical Security** is required for information stored on paper or other physical media. Storage on a Banff Centre network folder, SharePoint, or Banff Centre electronic mail is permitted. Storage on desktops, laptops, tablets, smartphones, USB drives, portable hard drives, CDs, DVDs, tapes, or Banff Centre approved cloud storage providers is only allowed where Encryption is used for data at rest and in transit. Use of Banff Centre approved Software as a Service solutions is permitted.
- iii. **Distribution within Banff Centre:** Hand deliver to the recipient; Banff Centre electronic mail or **Approved Electronic Data Transmission Methods**. Personal information must only be shared for purposes allowed by FOIP.
- iv. **Distribution outside of Banff Centre:** Hand deliver to the recipient or through approved couriers with signature required, or via Canada Post with tracking. Electronic distribution must be by **Approved Electronic Data Transmission Methods**. If shared with a **Third Party** outside of Banff Centre pre-approval from FOIP Office required prior to sharing personal information. Sender must execute an agreement (approved by FOIP Office) with a Third Party agreeing to abide by directions to protect information.

d. **Highly Confidential – Very High Sensitivity**

- i. **Access:** Access is limited to specific named individuals or positions on a need-to-know basis. Access must be revoked immediately when users leave Banff Centre or change departments.
- ii. **Storage requirements:** Unnecessary personal information must be removed/deleted and not stored. Strong Passwords for electronic information is required. Physical Security is required for information stored on paper or other physical media. Storage on a Banff Centre network folder, SharePoint, or Banff Centre electronic mail is permitted. Storage on desktops, laptops, tablets, smartphones, USB drives, portable hard drives, CDs, DVDs, tapes, or Banff Centre approved cloud storage providers is only allowed where Encryption is used for data at rest and in transit. Use of Banff Centre approved Software as a Service solutions is permitted. Data must be stored in Canada unless approved by Chief Information Officer or VP, Administration and Chief Financial Officer.
- iii. **Distribution within Banff Centre:** Hand deliver to the recipient. Banff Centre electronic mail or **Approved Electronic Data Transmission Methods**. Personal

information must only be shared for purposes allowed by FOIP. Please seek guidance from FOIP Office.

- iv. **Distribution outside of Banff Centre:** Hand deliver to the recipient or through approved couriers with signature required. Electronic distribution must be by Approved Electronic Data Transmission Methods. If shared with a Third Party outside of Banff Centre pre-approval from FOIP Office required prior to sharing personal information. Sender must execute an agreement (approved by FOIP Office) with a Third Party agreeing to abide by directions to protect information.

e. Restricted – Special Protection Required

- i. **Access: Individual Access Control** is in compliance with relevant standard, e.g. for credit card information – Payment Card Industry Data Security Standard ([PCI DSS](#)).
- ii. **Storage requirements:** Storage of both electronic data and paper documents is in compliance with relevant standard.
- iii. **Distribution within Banff Centre:** This information can be shared within Banff Centre following relevant standard.
- iv. **Distribution outside of Banff Centre:** This information can be shared outside of Banff Centre following relevant standard.
- v. **Purge requirements:** as per relevant standard.

f. Prohibited

- i. **Access:** Access is not permitted.
- ii. **Storage requirements:** Storage is not permitted.
- iii. **Distribution within Banff Centre:** This information is not to be shared within Banff Centre.
- iv. **Distribution outside of Banff Centre:** This information is not to be shared outside of Banff Centre.

DEFINITIONS

Any definitions listed in the following table apply to this document only with no implied or intended institution-wide use.

Defined Term	Definition
Approval Authority	The individual or entity with the authority to approve this Procedure
Approved Electronic Data Transmission Methods	Data Sharing technologies approved by Information Technologies and Services. Contact the ITS Help Desk for information.
Banff Centre	Banff Centre for Arts and Creativity.
Banff Centre Community	Persons associated with Banff Centre including: <ul style="list-style-type: none"> • members of Banff Centre’s Board of Governors; • members of the Board of Directors of The Banff Centre Foundation; • members of the Senior Leadership Team; • staff, including sessional workers;

	<ul style="list-style-type: none"> • volunteers; • artists, including practicums; • others performing activities or providing goods or services at or under the auspices of Banff Centre, including consultants, guests, vendors and contractors.
Banff Centre Information	Information, regardless of its source, that is stored or shared on any medium (paper or electronic) in the custody or under the control of Banff Centre, including copyrighted material in the custody or control of Banff Centre Community members, such as works of art or computer software.
Encryption	The process of transforming information to make it unreadable to anyone except those possessing special knowledge. Sensitive information must be secured using an approved encryption utility.
FOIP	<i>Alberta's Freedom of Information and Protection of Privacy Act.</i>
Implementation Authority	The individual or position with responsibility for implementing this Procedure.
Individual Access Controls	Methods of electronically protecting files from being accessed by people other than those specifically designated by the owner, including the use of passwords to login and resume from screensavers, sleep, standby or hibernation.
Physical Security	Either having actual possession of an item at all times, or locking it in an unusable state to an object that is immovable. In the office, doors must be locked or equipment secured. When leaving for the day, laptops and any other sensitive material must be placed in a locked drawer or cabinet. Paper records and/or files must be kept in an area designated as secure with appropriate physical access controls such as card readers or locks.
Senior Leadership Team	The President and CEO, together with the Vice Presidents of Banff Centre.
Strong Password	A password of at least eight alphanumeric characters and containing both upper and lower case characters, digits and special characters, which is not a complete word, nor based on personal information, names of family, company name, or birthdays.
Third Party	Any individual or organization other than Banff Centre Community or the owner of the

	information (e.g., in the case of personal information, the individual the information refers to).
Software as a Service	A software distribution model in which a third-party provider hosts applications and makes them available to customers over the Internet.

RELEVANT DOCUMENTS

- **Relevant legislation**
 - *Alberta’s Freedom of Information and Protection of Privacy Act (FOIP)*
 - *Personal Information Protection and Electronic Documents Act (PIPEDA)* – applicable to The Banff Centre Foundation only
 - *Alberta’s Personal Information Protection Act (PIPA)* – applicable to The Banff Centre Foundation only
- **Relevant standards**
 - ISO – International Organization for Standardization
 - ISO 27002 – Code of practice for information security controls
 - 9.2 – Equipment Security
 - ITIL v3 – Information Technology Infrastructure Library
 - 4.6.4.3 – Service Design: The Information Security Management System
 - CSEC – Communications Security Establishment Canada
 - ITSG-06 – Clearing and Declassifying Electronic Data Storage Devices
 - COBIT – Control Objectives for Information and Related Technologies
 - AI3.3 – Infrastructure Maintenance
 - DS5.7 – Protection of Security Technology
 - DS11.1 – Business Requirements for Data Management
 - DS11.4 – Disposal
 - DS12.2 – Physical Security Measures
 - DS13.1 – Operations Procedures and Instructions
- **Relevant Banff Centre policies and procedures**
 - *Policy – Code of Ethics*
 - *Policy – Information Security Policy*
 - *Procedure – Information Security – Incident Response Plan*

MODIFICATION HISTORY

- Original Approval Date: July 18, 2017
- Effective Date: July 18, 2017
- Subsequent Revision Dates: March 1, 2019

CONTACT

For enquiries relating to this Procedure, please contact the Chief Information Officer:

- Email: cio@banffcentre.ca
- Phone: Ext. 6543

INFORMATION STORAGE AND DISTRIBUTION REQUIREMENTS – QUICK REFERENCE

The two tables below serve as a quick reference for a) Storage and b) Distribution. Two classifications are not included in the tables. Restricted Information must follow relevant standards not defined in this procedure. Prohibited information may not be stored or distributed. In all cases the text in section 2 takes precedence over the contents of the tables.

STORAGE	PUBLIC	INTERNAL	CONFIDENTIAL	HIGHLY CONFIDENTIAL
Desktop/Laptop	✓	✓ Strong Password required	✓ Strong Password and Encryption required	✓ Strong Password and Encryption required
Tablets, smartphones, USB drives, portable hard drives, CDs, DVDs, tapes	✓	✓ Strong Password or Encryption required	✓ Strong Password and Encryption required	✓ Strong Password and Encryption required
Banff Centre network folder	✓	✓	✓	✓
Banff Centre SharePoint	✓	✓	✓	✓
Banff Centre Email	✓	✓	✓	✓
Approve Cloud Storage	✓	✓	✓ Encryption at rest and in transit required	✓ Encryption at rest and in transit required Must be in Canada unless approved otherwise
Approved Software as a Service	✓	✓	✓	✓ Must be in Canada unless approved otherwise

Paper or other physical media	✓	✓	✓ Physical Security required	✓ Physical Security required
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✓ – allowed and no special requirements ✓ – allowed as long as special requirements are met

		DISTRIBUTION	PUBLIC	INTERNAL	CONFIDENTIAL	HIGHLY CONFIDENTIAL
Within Banff Centre	Standard Interoffice mail	✓	✓	✓	✗	✗
	Banff Centre Email	✓	✓	✓	✓	✓
	Delivered in person	✓	✓	✓	✓ In sealed envelope stamped 'Confidential'	✓ In sealed envelope stamped 'Confidential' and signature required
	Electronic file transmission methods	✓	✓	✓ Only by approved methods	✓ Only by approved methods	✓ Only by approved methods
Outside of Banff Centre	Canada Post	✓	✓	✓	✓ With tracking	✗
	Approved couriers	✓	✓	✓	✓ Signature required	✓ Signature required
	Email	✓	✓	✓	✗	✗
	Electronic file transmission methods	✓	✓	✓ Only by approved methods	✓ Only by approved methods	✓ Only by approved methods

	Delivered in person	✓	✓	✓ Signature required	✓ Signature required
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– allowed and no special requirements



– allowed as long as special requirements are met



– not allowed