Classified information

Classified information is material that a government body deems to be <u>sensitive information</u> that must be protected. Access is restricted by <u>law</u> or regulation to particular groups of people with the necessary security clearance and need to know, and mishandling of the material can incur criminal penalties.

A formal <u>security clearance</u> is required to view or handle classified documents or to access classified data. The clearance process requires a satisfactory background investigation. Documents and other information must be properly marked "by the author" with one of several (hierarchical) levels of sensitivity—e.g. restricted, confidential, secret, and top secret. The choice of level is based on an impact assessment; governments have their own criteria, including how to determine the classification of an information asset and rules on how to protect information classified at each level. This process often includes security clearances for personnel handling the information.

Although "classified information" refers to the formal <u>categorization</u> and marking of material by level of sensitivity, it has also developed a sense synonymous with "<u>censored</u>" in <u>US English</u>. A distinction is often made between formal security classification and privacy markings such as "commercial in confidence". Classifications can be used with additional keywords that give more detailed instructions on how data should be used or protected.

Some <u>corporations</u> and non-government organizations also assign levels of protection to their private information, either from a desire to protect <u>trade secrets</u>, or because of laws and regulations governing various matters such as <u>personal privacy</u>, sealed legal proceedings and the timing of financial information releases.

With the passage of time much classified information can become a bit less sensitive, or becomes much less sensitive, and may be declassified and made public. Since the late twentieth century there has been <u>freedom of information legislation</u> in some countries, whereby the public is deemed to have the right to all information that is not considered to be damaging if released. Sometimes documents are released with information still considered confidential obscured (<u>redacted</u>), as in the adjacent example.

The question exists among some political science and legal experts, whether the definition of classified ought to be information that would cause injury to the cause of justice, human rights, etc., rather than information that would cause injury to the national interest, to distinguish when classifying information is in the collective best interest of a just society or merely the best interest of

13 of a U.S. National Security

Agency report on the USS Liberty
incident, partially declassified and
released to the public in July 2004.
The original overall classification of
the page, "top secret", and the
Special Intelligence code word
"umbra", are shown at top and
bottom. The classification of
individual paragraphs and reference
titles is shown in parentheses—there
are six different levels on this page

alone. Notations with leader lines at

top and bottom cite statutory authority for not declassifying certain

sections.

A typical classified document. Page

The second secon

a society acting unjustly, to protect its people, government, or administrative officials from legitimate recourses consistent with a fair and just social contract.

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Government classification

The purpose of classification is to protect information. Higher classifications protect information that might endanger <u>national security</u>. Classification formalises what constitutes a "state secret" and accords different levels of protection based on the expected damage the information might cause in the wrong hands.

However, classified information is frequently "leaked" to reporters by officials for political purposes. Several U.S. presidents have leaked sensitive information to get their point across to the public. [2][3]

Typical classification levels

Although the classification systems vary from country to country, most have levels corresponding to the following British definitions (from the highest level to lowest).

Top Secret (TS)

Top Secret is the highest level of classified information. [4] Information is further compartmented so that specific access using a code word after *top secret* is a legal way to hide collective and important information. [5] Such material would cause "exceptionally grave damage" to <u>national security</u> if made publicly available. [6] Prior to 1942, the United Kingdom and other members of the British Empire used *Most Secret*, but this was later changed to match the United States' category name of *Top Secret* in order to simplify Allied interoperability.

The Washington Post reported in an investigation entitled *Top Secret America* that, as of 2010, "An estimated 854,000 people ... hold top-secret security clearances" in the United States. [7]

Secret

Secret material would cause "serious damage" to national security if it were publicly available. [10]

In the United States, operational "Secret" information can be marked with an additional "LIMDIS", to limit distribution.

Confidential

Confidential material would cause "damage" or be prejudicial to national security if publicly available. $^{[11]}$



KGB's "List of traitors to the Motherland, agents of foreign intelligence, and other wanted state criminals" (1979) seen in Museum of Genocide Victims, Vilnius: originally marked top secret

Restricted

Restricted material would cause "undesirable effects" if publicly available. Some countries do not have such a classification in public sectors, such as commercial industries. Such a level is also known as "*Private* Information".

Official

Official (Equivalent to US DOD classification FOUO – For Official Use Only) material forms the generality of government business, public service delivery and commercial activity. This includes a diverse range of information, of varying sensitivities, and with differing consequences resulting from compromise or loss. OFFICIAL information must be secured against a https://documents.org/linearing-number

The OFFICIAL SENSITIVE classification replaced the Restricted classification in April 2014 in the UK; OFFICIAL indicates the previously used UNCLASSIFIED marking. [12]

Unclassified

Unclassified is technically not a classification level, but this is a feature of some classification schemes, used for government documents that do not merit a particular classification or which have been declassified. This is because the information is low-impact, and therefore does not require any special protection, such as vetting of personnel.

A plethora of pseudo-classifications exist under this category.

"It is desired that no document be released which refers to experiments with humans and might have adverse effect on public opinion or result in legal suits. Documents covering such work field should be classified 'secret'."

April 17, 1947 Atomic Energy Commission memo from Colonel O.G. Haywood, Jr. to Dr. Fidler at the Oak Ridge Laboratory in Tennessee. [8] As of 2010, Executive Order 13526 bans classification of documents simply to "conceal violations of law, inefficiency, or administrative error" or "prevent embarrassment to a person, organization, or agency". [9]

Clearance

Clearance is a general classification, that comprises a variety of rules controlling the level of permission required to view some classified information, and how it must be stored, transmitted, and destroyed. Additionally, access is restricted on a "need to know" basis. Simply possessing a clearance does not automatically authorize the individual to view all material classified at that level or below that level. The individual must present a legitimate "need to know" in addition to the proper level of clearance.

Compartmented information

In addition to the general risk-based classification levels, additional <u>compartmented constraints on access</u> exist, such as (in the U.S.) Special Intelligence (SI), which protects intelligence sources and methods, No Foreign dissemination (NOFORN), which restricts dissemination to U.S. nationals, and Originator Controlled dissemination (ORCON), which ensures that the originator can track possessors of the information. Information in these compartments is usually marked with specific keywords in addition to the classification level.

Government information about nuclear weapons often has an additional marking to show it contains such information (CNWDI).

International

When a government agency or group shares information between an agency or group of other country's government they will generally employ a special classification scheme that both parties have previously agreed to honour.

For example, the marking ATOMAL, is applied to U.S. RESTRICTED DATA or FORMERLY RESTRICTED DATA and United Kingdom ATOMIC information that has been released to NATO. ATOMAL information is marked COSMIC TOP SECRET ATOMAL (CTSA), NATO SECRET ATOMAL (NSAT), or NATO CONFIDENTIAL ATOMAL (NCA).

NATO classifications

For example, sensitive information shared amongst \underline{NATO} allies has four levels of security classification; from most to least classified: $\underline{^{[13][14]}}$

- 1. COSMIC TOP SECRET (CTS)
- 2. NATO SECRET (NS)
- 3. NATO CONFIDENTIAL (NC)
- 4. NATO RESTRICTED (NR)

A special case exists with regard to NATO UNCLASSIFIED (NU) information. Documents with this marking are NATO property (copyright) and must not be made public without NATO permission.

International organisations

- The <u>European Union</u> has four levels: EU TOP SECRET, EU SECRET, EU CONFIDENTIAL, EU RESTRICTED. [16] (Note that usually the French terms are used.)
 - TRÈS SECRET UE/EU TOP SECRET: information and material the unauthorised disclosure of which could cause exceptionally grave prejudice to the essential interests of the European Union or of one or more of the Member States;
 - SECRET UE/EU SECRET: information and material the unauthorised disclosure of which could seriously harm the
 essential interests of the European Union or of one or more of the Member States;
 - CONFIDENTIEL UE/EU CONFIDENTIAL: information and material the unauthorised disclosure of which could harm the essential interests of the European Union or of one or more of the Member States;
 - **RESTREINT UE/EU RESTRICTED**: information and material the unauthorised disclosure of which could be disadvantageous to the interests of the European Union or of one or more of the Member States.
- Organisation for Joint Armament Cooperation, a European defence organisation, has three levels of classification:
 OCCAR SECRET, OCCAR CONFIDENTIAL, and OCCAR RESTRICTED.
- ECIPS, the European Centre for Information Policy and Security, has 4 levels of Security Information, COSMIC (TOP SECRET), EC-SECRET, EC-CONFIDENTIAL and EC-COMMITTEES.

By country

Most countries employ some sort of classification system for certain government information. For example, in <u>Canada</u>, information that the U.S. would classify SBU (Sensitive but Unclassified) is called "protected" and further subcategorised into levels A, B, and C.

Australia

On 19 July 2011, the National Security (NS) classification marking scheme and the Non-National Security (NNS) classification marking scheme in Australia was unified into one structure.

The Australian Government Security Classification system now comprises TOP SECRET, SECRET, CONFIDENTIAL and PROTECTED. A new dissemination limiting markers (DLMs) scheme was also introduced for information where disclosure may be limited or prohibited by legislation, or where it may otherwise require special handling. The DLM marking scheme comprises For Official Use Only (FOUO), Sensitive, Sensitive: Personal, Sensitive: Legal, and Sensitive: Cabinet. [19]

Documents marked Sensitive Cabinet, relating to discussions in Federal Cabinet, are treated as PROTECTED at minimum due to its higher sensitivity.

Brazil

There are three levels of document classification under Brazilian Information Access Law (http://www.planalto.gov.br/ccivil_03/_ato2011-2014/2011/Lei/L12527.htm): ultrassecreto (top secret), secreto (secret) and reservado (restricted).

MATIONALE. VOLFRANKE
der Deutschen Demokratischen Republik

CHARLE D. 1044 CHARLE
CONSTRUCTION D. 1044 CHARLE
ANAICTIQUES D. 1044
A 0407/7321
M-125
- Habbung -

Facsimile of the cover page from an East German operation manual for the M-125 Fialka cipher machine. The underlined classification markings can be translated as "Cryptologic material! Secret restricted material" de:Verschlusssache.

A top secret (*ultrassecreto*) government-issued document may be classified for a period of 25 years, which may be extended up to another 25 years. Thus, no document remains classified for more than 50 years. This is mandated by the 2011 Information Access Law (*Lei de Acesso à Informação*), a change from the previous rule, under which documents could have their classification time length renewed indefinitely, effectively shuttering state secrets from the public. The 2011 law applies retroactively to existing documents.

Canada

Background and hierarchy

The Government of Canada employs two main types of sensitive information designation: Classified and Protected. The access and protection of both types of information is governed by the <u>Security of Information Act</u>, effective December 24, 2001, replacing the *Official Secrets Act* 1981. [20] To access the information, a person must have the appropriate security clearance and the need to know.

In addition, the caveat "Canadian Eyes Only" is used to restrict access to Classified or Protected information only to Canadian citizens with the appropriate security clearance and need to know. [21]

Special operational information

SOI is not a classification of data *per se*. It is defined under the *Security of Information Act*, and unauthorised release of such information constitutes a higher breach of trust, with penalty of life imprisonment.

SOIs include:

- military operations in respect of a potential, imminent or present armed conflict
- the identity of confidential source of information, intelligence or assistance to the Government of Canada
- tools used for information gathering or intelligence
- the object of a covert investigation, or a covert collection of information or intelligence
- the identity of any person who is under covert surveillance
- encryption and cryptographic systems
- information or intelligence to, or received from, a foreign entity or terrorist group

Classified information

Classified information can be designated *Top Secret*, *Secret* or *Confidential*. These classifications are only used on matters of national interest.

- Top Secret: applies when compromise might reasonably cause exceptionally grave injury to the national interest. The possible impact must be great, immediate and irreparable.
- Secret: applies when compromise might reasonably cause serious injury to the national interest.
- Confidential: disclosure might reasonably cause injury to the national interest.

Protected information

Protected information is not classified. It pertains to any sensitive information that does not relate to national security and cannot be disclosed under the access and privacy legislation because of the potential injury to particular public or private interests. [22][23]

- Protected C (Extremely Sensitive protected information): designates extremely sensitive information, which if compromised, could reasonably be expected to cause extremely grave injury outside the national interest. Examples include bankruptcy, identities of informants in criminal investigations, etc.
- Protected B (Particularly Sensitive protected information): designates information that could cause severe injury or damage to the people or group involved if it was released. Examples include medical records, annual personnel performance reviews, income tax returns, etc.
- Protected A (Low-Sensitive protected information): designates low sensitivity information that should not be disclosed to
 the public without authorization and could reasonably be expected to cause injury or embarrassment outside the national
 interest. Example of Protected A information include employee identification number, pay deposit banking information, etc.

Federal Cabinet (Queen's Privy Council for Canada) papers are either protected (e.g., overhead slides prepared to make presentations to Cabinet) or classified (e.g., draft legislation, certain memos).^[24]

People's Republic of China

The <u>Criminal Law</u> of the <u>People's Republic of China</u> (which is not operative in the Special Administrative Regions of <u>Hong Kong</u> and <u>Macau</u>) makes it a crime to release a state secret. Regulation and enforcement is carried out by the <u>National Administration</u> for the Protection of State Secrets.

Under the 1989 "Law on Guarding State Secrets," [25] state secrets are defined as those that concern:

- 1. Major policy decisions on state affairs
- 2. The building of national defence and in the activities of the armed forces
- 3. Diplomatic activities and in activities related to foreign countries and those to be maintained as commitments to foreign countries
- 4. National economic and social development
- 5. Science and technology
- 6. Activities for preserving state security and the investigation of criminal offences
- 7. Any other matters classified as "state secrets" by the national State Secrets Bureau[26]

Secrets can be classified into three categories:



A building in <u>Wuhan</u> housing provincial offices for dealing with foreign countries etc. The red slogan says, "Protection of national secrets is a duty of every citizen".

- Top secret (绝密): defined as "vital state secrets whose disclosure would cause extremely serious harm to state security and national interests"
- Highly secret (机密): defined as "important state secrets whose disclosure would cause serious harm to state security and national interests"
- Secret (秘密): defined as "ordinary state secrets whose disclosure would cause harm to state security and national interests" [26]

France

In France, classified information is defined by article 413-9 of the Penal Code. [27] The three levels of military classification are

- Très Secret Défense (Very Secret Defence): Information deemed extremely harmful to national defense, and relative to governmental priorities in national defense. No service or organisation can elaborate, process, stock, transfer, display or destroy information or protected supports classified at this level without authorization from the Prime Minister or the national secretary for National Defence. Partial or exhaustive reproduction is strictly forbidden.
- Secret Défense (Secret Defence): Information deemed very harmful to national defense. Such information cannot be reproduced without authorisation from the emitting authority, except in exceptional emergencies.
- Confidential Défense (Confidential Defence): Information deemed potentially harmful to national defense, or that could lead to uncovering some information classified at a higher level of security.

Less sensitive information is "protected". The levels are

- Confidential personnels Officiers ("Confidential officers")
- Confidential personnels Sous-Officiers ("Confidential non-commissioned officers")
- Diffusion restreinte ("restricted information")
- Diffusion restreinte administrateur ("administrative restricted information")
- Non Protégé (unprotected)

A further caveat, "spécial France" (reserved France) restricts the document to French citizens (in its entirety or by extracts). This is not a classification level.

Declassification of documents can be done by the *Commission consultative du secret de la défense nationale* (CCSDN), an independent authority. Transfer of classified information is done with double envelopes, the outer layer being plastified and numbered, and the inner in strong paper. Reception of the document involves examination of the physical integrity of the container and registration of the document. In foreign countries, the document must be transferred through specialised military mail or <u>diplomatic bag</u>. Transport is done by an authorised convoyer or habilitated person for mail under 20 kg. The letter must bear a seal mentioning "*PAR VALISE ACCOMPAGNEE-SACOCHE*". Once a year, ministers have an inventory of classified information and supports by competent authorities.

Once their usage period is expired, documents are transferred to archives, where they are either destroyed (by incineration, crushing, or overvoltage), or stored.

In case of unauthorized release of classified information, competent authorities are the Ministry of Interior, the Haut fonctionnaire de défense et de sécurité ("high civil servant for defence and security") of the relevant ministry, and the General secretary for National Defence. Violation of such secrets is an offence punishable with 7 years of imprisonment and a 100,000 Euro fine; if the offence is committed by imprudence or negligence, the penalties are 3 years of imprisonment and a 45,000 Euro fine.

Hong Kong

The <u>Security Bureau</u> is responsible for developing policies in regards to the protection and handling of confidential government information. In general, the system used in Hong Kong is very similar to the UK system, developed from the Colonial Hong Kong era.

Four classifications exists in Hong Kong, from highest to lowest in sensitivity: [28]

- Top Secret (絕對機密)
- Secret (高度機密)
- Confidential (機密)
 - Temporary Confidential (臨時保密)
- Restricted (限閱文件/內部文件)
 - Restricted (staff) (限閱文件(人事))
 - Restricted (tender) (限閱文件 (投標))

■ Restricted (administration) (限閱文件 (行政))

Restricted documents are not classified *per se*, but only those who have a need to know will have access to such information, in accordance with the *Personal Data (Privacy) Ordinance*. [29]

New Zealand

<u>New Zealand</u> uses the Restricted classification, which is lower than Confidential. People may be given access to Restricted information on the strength of an authorisation by their Head of Department, without being subjected to the background <u>vetting</u> associated with Confidential, Secret and Top Secret clearances. New Zealand's security classifications and the national-harm requirements associated with their use are roughly similar to those of the United States.

In addition to national security classifications there are two additional security classifications, In Confidence and Sensitive, which are used to protect information of a policy and privacy nature. There are also a number of information markings used within ministries and departments of the government, to indicate, for example, that information should not be released outside the originating ministry.

Because of strict privacy requirements around personal information, personnel files are controlled in all parts of the public and private sectors. Information relating to the security vetting of an individual is usually classified at the In Confidence level.

Romania

In <u>Romania</u>, classified information is referred to as "state secrets" (*secrete de stat*) and is defined by the Penal Code as "documents and data that manifestly appear to have this status or have been declared or qualified as such by decision of Government". There are three levels of classification—Secret, Top Secret, and Top Secret of Particular Importance. The levels are set by the <u>Romanian Intelligence Service</u> and must be aligned with NATO regulations—in case of conflicting regulations, the latter are applied with priority. Dissemination of classified information to foreign agents or powers is punishable by up to life imprisonment, if such dissemination threatens Romania's national security. The levels are set by the <u>Romanian Intelligence Service</u> and must be aligned with NATO regulations—in case of conflicting regulations, the latter are applied with priority. Dissemination of classified information to foreign agents or powers is punishable by up to life imprisonment, if such dissemination threatens Romania's national security.

Russia

In the <u>Russian Federation</u>, a state secret (Государственная тайна) is information protected by the state on its military, foreign policy, economic, intelligence, counterintelligence, operational and investigative and other activities, dissemination of which could harm state security.

Sweden

The Swedish classification has been updated due to increased NATO/PfP cooperation. All classified defence documents will now have both a Swedish classification (*Kvalificerat hemlig*, *Hemlig*, *Konfidentiell* or *Begränsat Hemlig*), and an English classification (Top Secret, Secret, Confidential, or Restricted). The term *skyddad identitet*, "protected identity", is used in the case of protection of a threatened person, basically implying "secret identity", accessible only to certain members of the police force and explicitly authorised officials.



KGB Regulation seen in Museum of Genocide Victims Vilnius

Switzerland

At the federal level, classified information in Switzerland is assigned one of three levels, which are from lowest to highest: INTERNAL, CONFIDENTIAL, SECRET. [33] Respectively, these are, in German, INTERN, VERTRAULICH, GEHEIM; in French, INTERNE, CONFIDENTIEL, SECRET; in Italian, AD USO INTERNO, CONFIDENZIALE, SEGRETO. As in other countries, the choice of classification depends on the potential impact that the unauthorised release of the classified document would have on Switzerland, the federal authorities or the authorities of a foreign government.

According to the Ordinance on the Protection of Federal Information, information is classified as INTERNAL if its "disclosure to unauthorised persons may be disadvantageous to national interests." Information classified as CONFIDENTIAL could, if disclosed, compromise "the free formation of opinions and decision-making of the Federal Assembly or the Federal Council," jeopardise national monetary/economic policy, put the population at risk or adversely affect the operations of the Swiss Armed Forces. Finally, the unauthorised release of SECRET information could seriously compromise the ability of either the Federal Assembly or the Federal Council to function or impede the ability of the Federal Government or the Armed Forces to act.

Turkey

According to the related regulations in <u>Turkey</u>, there are four levels of document classification: [34] *çok gizli* (top secret), *gizli* (secret), *özel* (confidential) and *hizmete özel* (restricted). The fifth "inscription" is *tasnif dışı*, which means unclassified.

United Kingdom

Until 2013, the <u>United Kingdom</u> used five levels of classification—from lowest to highest, they were: PROTECT, RESTRICTED, CONFIDENTIAL, SECRET and TOP SECRET (formerly MOST SECRET). The <u>Cabinet Office</u> provides guidance on how to protect information, including the <u>security</u> clearances required for personnel. Staff may be required to sign to confirm their understanding and acceptance of the <u>Official Secrets Acts 1911 to 1989</u>, although the Act applies regardless of signature. PROTECT is not in itself a security protective marking level (such as RESTRICTED or greater), but is used to indicate information which should not be disclosed because, for instance, the document contains tax, national insurance, or other personal information.

Government documents without a classification may be marked as UNCLASSIFIED or NOT PROTECTIVELY MARKED. [35]

This system was replaced by the <u>Government Security Classifications Policy</u>, which has a simpler model: TOP SECRET, SECRET, and OFFICIAL from April 2014. OFFICIAL SENSITIVE is a security marking which may be followed by one of three authorised descriptors: COMMERCIAL, LOCSEN (location sensitive) or PERSONAL. SECRET and TOP SECRET may include a caveat such as UK EYES ONLY.

Also useful is that scientific discoveries may be classified via the <u>D-Notice</u> system if they are deemed to have applications relevant to national security. These may later emerge when technology improves so for example the specialised processors and routing engines used in graphics cards are loosely based on top secret military chips designed for code breaking and image processing. They may or may not have safeguards built in to generate errors when specific tasks are attempted and this is invariably independent of the card's operating system.

Descript Indicate sharing risk control from the state of the state of

are to be kept secret. A single frame

around the text indicates *Hemlig*, which can be equal to either Secret,

Confidential or Restricted. Double

frames means Kvalificerat hemlig,

that is, Top Secret.

Security classifications in the UK

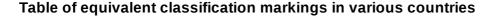
United States

The U.S. classification system is currently established under <u>Executive Order 13526</u> and has three levels of classification—Confidential, Secret, and Top Secret. The U.S. had a Restricted level during World War II but no longer does. U.S. regulations state that information received from other

countries at the Restricted level should be handled as Confidential. A variety of markings are used for material that is not classified, but whose distribution is limited administratively or by other laws, e.g., For Official Use Only (FOUO), or Sensitive but Unclassified (SBU). The Atomic Energy Act of 1954 provides for the protection of information related to the design of nuclear weapons. The term "Restricted Data" is used to denote certain nuclear technology. Information about the storage, use or handling of nuclear material or weapons is marked "Formerly Restricted Data". These designations are used in addition to level markings (Confidential, Secret and Top Secret). Information protected by the Atomic Energy Act is protected by law and information classified under the Executive Order is protected by Executive privilege.

The U.S. government insists it is "not appropriate" for a court to question whether any document is legally classified. In the $\underline{1973}$ trial of $\underline{1973}$ trial of

When a government agency acquires classified information through covert means, or designates a program as classified, the agency asserts "ownership" of that information and considers any public availability of it to be a violation of their ownership — even if the same information was acquired independently through "parallel reporting" by the press or others. For example, although the CIA drone program has been widely discussed in public since the early 2000s, and reporters personally observed and reported on drone missile strikes, the CIA still considers the very existence of the program to be classified in its entirety, and any public discussion of it technically constitutes exposure of classified information. "Parallel reporting" was an issue in determining what constitutes "classified" information during the Hillary Clinton email controversy when Assistant Secretary of State for Legislative Affairs Julia Frifield noted, "When policy officials obtain information from open sources, 'think tanks,' experts, foreign government officials, or others, the fact that some of the information may also have been available through intelligence channels does not mean that the information is necessarily classified."





(State)	Top Secret	Secret	Confidential	Restricted
Albania	Teper Sekret	Sekret	Konfidencial	I Kufizuar
<u>Argentina</u>	Estrictamente Secreto y Confidencial	Secreto	Confidencial	Reservado
Australia	Top Secret	Secret	Confidential	Protected
Austria	Streng Geheim	Geheim	Vertraulich	Eingeschränkt
<u>Belgium</u>	Zeer Geheim / Très Secret	Geheim / Secret	Vertrouwelijk / Confidentiel	Beperkte Verspreiding / Diffusion restreinte
Bolivia	Supersecreto or Muy Secreto	Secreto	Confidencial	Reservado
Bosnia and Herzegovina	Vrlo tajno	Tajno	Povjerljivo	Interno
Brazil	Ultrassecreto	Secreto	no equivalent (formerly Confidencial)	Reservado
Bulgaria	Strògo sècretno Строго секретно	Sècretno Секретно	Poveritèlno Поверително	Za služebno polzvàne За служебно ползване
Cambodia	Sam Ngat Bamphot	Sam Ngat Roeung	Art Kambang	Ham Kom Psay
Canada	Top Secret/Très secret	Secret/Secret	Confidential/Confidentiel	Protected A, B or C / Protégé A, B ou C
Chile	Secreto	Secreto	Reservado	Reservado
China	Juémì (绝密)	Jīmì (机密)	Mìmì (秘密)	Nèibù (内部)
Colombia	Ultrasecreto	Secreto	Confidencial	Reserva del sumario
Costa Rica	Alto Secreto	Secreto	Confidencial	
Croatia	Vrlo tajno	Tajno	Povjerljivo	Ograničeno
Czech Republic	Přísně tajné	Tajné	Důvěrné	Vyhrazené
<u>Denmark</u>	Yderst Hemmeligt (YHM)	Hemmeligt (HEM)	Fortroligt (FTR)	Til Tjenestebrug (TTJ) Foreign Service: Fortroligt (thin Black border)
Ecuador	Secretisimo	Secreto	Confidencial	Reservado
Egypt	Sirriy lil-Ġāyah سري للغاية	Sirriy Ğiddan سري جداً	Khāṣ خاص	Maḥzūr محظور
El Salvador	Ultra Secreto	Secreto	Confidencial	Reservado
Estonia	Täiesti salajane	Salajane	Konfidentsiaalne	Piiratud
Ethiopia	ብርቱ ምስጢር	ምስጢር	ጥብቅ	ክልክል
European Union (EU)	TRES SECRET UE / EU TOP SECRET	SECRET UE / EU SECRET	CONFIDENTIEL UE / EU CONFIDENTIAL	RESTREINT UE / EU RESTRICTED
European Union (Western) (WEU)	FOCAL TOP SECRET	WEU SECRET	WEU CONFIDENTIAL	WEU RESTRICTED
Euratom	EURA TOP SECRET	EURA SECRET	EURA CONFIDENTIAL	EURA RESTRICTED
Finland ^[a]	Erittäin salainen (ST I)	Salainen (ST II)	Luottamuksellinen (ST III)	Käyttö rajoitettu (ST IV)
France	Très secret défense	Secret défense	Confidentiel défense	Diffusion restreinte
Germany	STRENG GEHEIM	GEHEIM	VS-VERTRAULICH	VS-NUR FÜR DEN DIENSTGEBRAUCH
Greece	Άκρως Απόρρητον	Απόρρητον	Εμπιστευτικόν	Περιορισμένης Χρήσης
Guatemala	Alto Secreto	Secreto	Confidencial	Reservado
Haiti	Top Secret	Secret	Confidential	Reserve
Honduras	Super Secreto	Secreto	Confidencial	Reservado
Hong Kong	Top Secret, 高度機密	Secret, 機密	Confidential, 保密	Restricted,內部文件/限閱文件
Hungary	Szigorúan Titkos	Titkos	Bizalmas	Korlátozott Terjesztésű

India (<u>Hindi</u>)	परम गुप्त (Param Gupt)	गुप्त (Gupt)	गोपनीय (Gopniya)	प्रतिबंधित/सीमित (Pratibandhit/seemit)
India (English)	Top Secret	Secret	Confidential	Restricted
Indonesia	Sangat Rahasia	Rahasia	Rahasia Dinas	Terbatas
Iran	Bekoli-Serri بکلی سری	Serri سری	Kheili-Mahramaneh خیلی محرمانه	محرمانه Mahramaneh
Iraq	Sirriy lil-Ġāyah سري للغاية	Sirriy سري	Khāş خاص	Maḥdūd محدود
Iceland	Algert Leyndarmál	Leyndarmál	Trúnaðarmál	Þjónustuskjal
Ireland (Irish language)	An-sicreideach	Sicreideach	Runda	Srianta
Israel	Sodi Beyoter סודי ביותר	Sodi OIT'	Shamur שמור	Mugbal מוגבל
Italy	Segretissimo	Segreto	Riservatissimo	Riservato
Japan	Kimitsu (機密)	Gokuhi (極秘)	Hi (秘)	Toriatsukaichuui (取り扱い 注意)
Jordan	Maktūm Ğiddan مکتوم جداً	Maktūm مکتوم	Sirriy سري	Maḥdūd محدود
South Korea	1(II)-geup Bimil, 1급 비밀, 一級秘密	2(I)-geup Bimil, 2급 비밀, 二 級秘密	3(Sam)-geup Bimil, 3급 비 밀, 三級秘密	Daeoebi, 대외비, 對外秘
Laos	Lup Sood Gnod	Kuam Lup	Kuam Lap	Chum Kut Kon Arn
Latvia	Sevišķi slepeni	Slepeni	Konfidenciāli	Dienesta vajadzībām
Lebanon	Tres Secret	Secret	Confidentiel	
Lithuania	Visiškai Slaptai	Slaptai	Konfidencialiai	Riboto Naudojimo
Malaysia	Rahsia Besar	Rahsia	Sulit	Terhad
Mexico	Ultra Secreto	Secreto	Confidencial	Restringido
Montenegro	Strogo Tajno	Tajno	Povjerljivo	Interno
Netherlands ^[41]	STG. Zeer Geheim	STG. Geheim	STG. Confidentieel	Departementaal Vertrouwelijk
New Zealand	Top Secret	Secret	Confidential	Restricted
Nicaragua	Alto Secreto	Secreto	Confidencial	Reservado
Norway	STRENGT HEMMELIG	HEMMELIG	KONFIDENSIELT	BEGRENSET
Pakistan (Urdu)	Intahai Khufia انتہائی خفیہ	Khufia خفیہ	Sigh-e-Raz صیخہ راز	Barai Mahdud Taqsim محدود تقسیم
Pakistan (English)	Top Secret	Secret	Confidential	Restricted
Paraguay	Secreto	Secreto	Confidencial	Reservado
Peru	Estrictamente Secreto	Secreto	Confidencial	Reservado
Philippines (English)	Top Secret	Secret	Confidential	Restricted
Philippines (Tagalog)	Matinding Lihim	Mahigpit na Lihim	Lihim	Ipinagbabawal
Poland	Ściśle tajne	Tajne	Poufne	Zastrzeżone
Portugal	Muito Secreto	Secreto	Confidencial	Reservado
Romania	Strict Secret de Importanță Deosebită	Strict Secret	Secret	Secret de serviciu
Russia	Особой важности (вариант: Совершенно Секретно (Sovershenno Sekretno))	Совершенно секретно (вариант: Секретно (Sekretno))	Секретно (вариант: Не подлежит оглашению (Конфиденциально) (Ne podlezhit oglasheniyu (Konfidentsial'no))	Для Служебного Пользования (ДСП) (Dlya Sluzhebnogo Pol'zovaniya)
Saudi Arabia	Saudi Top Secret	Saudi Very Secret	Saudi Secret	Saudi Restricted
Serbia	Latin: Državna tajna Cyrillic: Државна тајна	Latin: Strogo poverljivo Cyrillic: Строго поверљиво	Latin: Poverljivo Cyrillic: Поверљиво	Latin: Interno Cyrillic: Интерно
Singapore	Top Secret	Secret	Confidential	Restricted
Somalia	Sir Muhiim ah	Sir Gooniya	Xog Qarsoon	Qarsoon

Slovak Republic	Prísne tajné	Tajné	Dôverné	Vyhradené
Slovenia	Strogo tajno	Tajno	Zaupno	Interno
Spain	Secreto	Reservado	Confidencial	Difusión Limitada
Sri Lanka	අති රහසා	රහසා	රහසිගත	සීමාන්විත
Sweden	Kvalificerat Hemlig (KH); Hemlig/Top Secret (H/TS)	Hemlig (H); Hemlig/Secret (H/S)	Hemlig/Confidential (H/C)	Hemlig/Restricted (H/R)
Switzerland		GEHEIM / SECRET	VERTRAULICH / CONFIDENTIEL	INTERN / INTERNE
Taiwan (Republic of China) ^[42]	Top Secret (絕對機密)	Secret (極機密)	Confidential (機密)	no direct equivalent
Tanzania (Swahili)	SIRI KUU	SIRI	STIRI	IMEZUILIWA
Thailand	Lap thi sut (ลับที่สุด)	Lap mak (ลับมาก)	Lap (ลัυ)	Pok pit (ปกปิด)
Turkey	Çok Gizli	Gizli	Özel	Hizmete Özel
South Africa (English)	Top Secret	Secret	Confidential	Restricted
South Africa (Afrikaans)	Uiters Geheim	Geheim	Vertroulik	Beperk
Ukraine	Цілком таємно	Таємно	Конфіденційно	Для службового користування
<u>United Kingdom</u>	TOP SECRET	SECRET	OFFICIAL-SENSITIVE (formerly CONFIDENTIAL)	OFFICIAL (formerly RESTRICTED)
United States	Top Secret	Secret	Confidential	no direct equivalent
Uruguay	Ultra Secreto	Secreto	Confidencial	Reservado
<u>Vietnam</u>	Tuyệt Mật, 絕密	Tối Mật, 最密	Mật, 密	Phổ Biến Hạn Chế, 普遍限制

Table notes:

Table source: US Department of Defense (January 1995). "National Industrial Security Program - Operating Manual (DoD 5220.22-M)" (https://web.archive.org/web/20190727225319/https://apps.dtic.mil/dtic/tr/fulltext/u2/a291750.pdf) (PDF). pp. B1 - B3 (PDF pages:121–123). Archived from the original (https://apps.dtic.mil/dtic/tr/fulltext/u2/a291750.pdf) (PDF) on 27 July 2019. Retrieved 27 July 2019.

Corporate classification

Private corporations often require written confidentiality agreements and conduct background checks on candidates for sensitive positions. In the U.S. the Employee Polygraph Protection Act prohibits private employers from requiring lie detector tests, but there are a few exceptions. Policies dictating methods for marking and safeguarding company-sensitive information (e.g. "IBM Confidential") are common and some companies have more than one level. Such information is protected under trade secret laws. New product development teams are often sequestered and forbidden to share information about their efforts with un-cleared fellow employees, the original Apple Macintosh project being a famous example. Other activities, such as mergers and financial report preparation generally involve similar restrictions. However, corporate security generally lacks the elaborate hierarchical clearance and sensitivity structures and the harsh criminal sanctions that give government classification systems their particular tone.

Traffic Light Protocol

The $\underline{\text{Traffic Light Protocol}}^{[44][45]}$ was developed by the $\underline{\text{Group of Eight}}$ countries to enable the sharing of sensitive information between government agencies and corporations. This protocol has now been accepted as a model for trusted information exchange by over 30 other countries. The protocol provides for four "information sharing levels" for the handling of sensitive information.

See also

- Economic Espionage Act of 1996 (U.S.)
- Espionage
- Espionage Act of 1917 (U.S.)
- Eyes only
- Government Security Classifications Policy (UK)
- Illegal number

a. Finland uses also uses the label *Salassa pidettävä*, "to be kept secret" for information that is not classified but must not be revealed on some other basis than national security. (E.g. privacy, trade secrets etc.)

- Information security
- Official Secrets Act (UK, India, Ireland, Malaysia, New Zealand)
- Security of Information Act (Canada)
- State Secrets Privilege (US)
- Wassenaar Arrangement
- WikiLeaks
- UKUSA Agreement
- Five Eyes
- Golden Shield Project

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