**POPI Information Technology Equipment Disposal Policy**

# Overview

Technology equipment often contains parts which cannot simply be thrown away. Proper disposal of equipment is both environmentally responsible and often required by law. In South Africa Act No. 59 of 2008: National Environmental Management: Waste Act, 2014 and Act No. 26 of 2014: National Environmental Management: Waste Amendment Act, 2014 both regulate what rules apply to disposal of items which may be potentially harmful to the environment. In addition, hard drives, USB drives, CD and DVD-ROMs and other storage media contain various kinds of <Company Name> data, some of which is governed by the Act No. 4 of 2013: Protection of Personal Information (POPI) Act.

In order to meet the requirements of the POPI Act, all storage mediums must be properly erased or effectively destroyed before being disposed of. However, simply deleting or even formatting data storage mechanisms may not be considered sufficient. When deleting files or formatting a device, data is marked for deletion, but is still accessible until being overwritten by a new file. Therefore, special tools must be used to securely erase data prior to equipment disposal.

# Purpose

The purpose of this policy it to define the guidelines for the disposal of technology equipment and components owned by <Company Name>.

# Scope

This policy applies to any computer/technology equipment or peripheral devices that are no longer needed within <Company Name> including, but not limited to the following:  personal computers, servers, hard drives, laptops, mainframes, smart phones, or handheld computers ( i.e., Windows Mobile, iOS or Android-based devices), tablets, peripherals (i.e., keyboards, mice, speakers), printers, scanners, typewriters, compact and floppy discs, portable storage devices (i.e., USB drives), backup tapes, printed materials.

All <Company Name> employees must comply with this policy.

# Policy

## Technology Equipment Disposal

* + - When Technology assets have reached the end of their useful life they should be sent to the <Equipment Disposal Team> office for proper disposal.
    - The <Equipment Disposal Team> will securely erase all storage mediums in accordance with current industry best practices.
    - All data including, all files and licensed software shall be removed from equipment using disk sanitizing software that cleans the media overwriting each and every disk sector of the machine with zero-filled blocks, meeting best practice standards.
    - No computer or technology equipment may be sold to any individual other than through the processes identified in this policy (see below).
    - No computer equipment should be disposed of via skips, dumps, landfill etc. Electronic recycling bins may be periodically placed in locations around <Company Name>. These can be used to dispose of equipment. The <Equipment Disposal Team> will properly remove all data prior to final disposal.
    - All electronic drives must be degaussed or overwritten with a commercially available disk cleaning program; this applies to all devices capable of being treated in this way. Hard drives may also be removed and rendered unreadable (drilling, crushing or other demolition methods).
    - Computer Equipment refers to desktop, laptop, tablet or netbook computers, printers, copiers, monitors, servers, handheld devices, telephones, cell phones, disc drives or any storage device, network switches, routers, wireless access points, batteries, backup tapes, etc.
    - The <Equipment Disposal Team> will place a sticker on the equipment case indicating the disk wipe has been performed. The sticker will include the date and the initials of the technician who performed the disk wipe.
    - Technology equipment with non-functioning memory or storage technology will have the memory or storage device removed and it will be physically destroyed.

## Employee Purchase of Disposed Equipment

[this approach is optional]

* + - Equipment which is working, but reached the end of its useful life to <Company Name>, will be made available for purchase by employees.
    - [Optional: A lottery system will be used to determine who has the opportunity to purchase available equipment.
    - All equipment purchases must go through the lottery process. Employees cannot purchase their office computer directly or “reserve” a system. This ensures that all employees have an equal chance of obtaining equipment.[
    - Finance and Information Technology will determine an appropriate cost for each item.
    - All purchases are final. No warranty or support will be provided with any equipment sold.
    - Any equipment not in working order or remaining from the lottery process will be donated or disposed of according to current environmental guidelines. Information
    - <Company Name> has contracted with several organizations to donate or properly dispose of outdated technology assets.
    - Prior to leaving <Company Name> premises, all equipment must be removed from the Information Technology inventory system.

# Policy Compliance

## Compliance Measurement

The <Company Name> management team will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

## Exceptions

Any exception to the policy must be approved by the <Company Name> management team in advance.

## Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

# Source

Source: This document is based on material available at [www.sans.org](http://www.sans.org).