



VALUE PROPOSITION

Create a clear internal policy for disposing of laptops, computers, hard drives and servers while supporting GDPR compliance.

ORGANIZATION NAME:
[Insert Company Name]

DOCUMENT REF / VER:
POL-ITAD-2026 / v1.0

POLICY OWNER:
IT & Information Security

EFFECTIVE DATE:
[DD/MM/YYYY]

SECTION 1: GOVERNANCE, SCOPE & DATA SANITIZATION

1. Purpose & Organizational Scope

This policy defines internal requirements for the secure, compliant, and environmentally responsible disposal of decommissioned IT assets owned or managed by the organization.

- **Covered Hardware:** Laptops, desktop PCs, servers, network switches, SAN/NAS arrays, external HDDs, SSDs, smartphones, and tablet devices.
- **Target Personnel:** Applies to all employees, IT administrators, contractors, and third-party vendors handling company hardware and data storage media.
- **Core Objective:** Ensure 100% prevention of data breaches during hardware retirement while maintaining full statutory environmental compliance.

2. Regulatory & GDPR Compliance Framework

Under Article 32 of the UK GDPR & Data Protection Act 2018, organizations must implement appropriate technical and organizational measures to ensure secure data handling throughout the complete hardware lifecycle.

- **Data Controller Liability:** Corporate legal liability remains with the business until verified destruction certificates are archived.
- **Audit Preparedness:** Complete audit trails must be maintained to demonstrate compliance to ICO auditors or ISO 27001 assessors.

3. Data Sanitization & Erasure Standards

Prior to physical release or transfer to an ITAD (IT Asset Disposal) provider, all media must undergo certified data destruction according to sensitivity class:

- **Logical Wipe (Re-use / Resale):** Software erasure matching **NIST SP 800-88 Rev 1 (Clear/Purge)** or **HMG IS5 Enhanced** with verification logs.
- **Cryptographic Erase (Self-Encrypting Drives):** Erasing media encryption keys supplemented by secondary multi-pass overwriting.
- **Physical Destruction (Defective Media):** Industrial shredding/degaussing to **DIN 66399 Level H-4/H-5** for unreadable or faulty drives.

SECTION 2: WORKFLOW, ROLES & GOVERNANCE AUTHORIZATION

4. Step-by-Step IT Asset Disposal Workflow

- **Step 1 — Asset Identification & Reconciliation:** Log serial numbers, asset tags, and storage capacity in the central ITSM database.
- **Step 2 — Account & Lock Revocation:** Deauthorize Apple iCloud/MDM profiles, BitLocker/FileVault keys, Intune, and firmware BIOS passwords.
- **Step 3 — Chain of Custody & Secure Storage:** Place assets in lockable, access-controlled cages with sign-in/sign-out log sheets.
- **Step 4 — Certified Execution & Vendor Handover:** Hand over equipment to an approved, licensed IT disposal partner (e.g., T&M Reuse Yorkshire Ltd) under Waste Transfer Note (WTN) documentation.
- **Step 5 — Certificate Vaulting & Ledger Update:** Collect Certificates of Data Destruction (COD), map to serial numbers, and update accounting financial ledgers.

Roles & Responsibilities

- **IT Director / CIO:** Overall policy ownership and vendor qualification.
- **Data Protection Officer (DPO):** Compliance oversight & ICO audit logging.
- **IT System Administrators:** Inventory logging, cloud unlinking & storage custody.
- **Authorized ITAD Partner:** Certified erasure, recycling & WTN issuance.

Compliance & Statutory Directives

- **UK GDPR / DPA 2018:** Article 32 Security of Processing.
- **NIST SP 800-88 Rev 1:** Media Sanitization Guidelines.
- **WEEE Regulations 2013:** Zero-landfill environmental directive.
- **ISO/IEC 27001:2022:** Control A.8.10 Information Deletion.

5. Environmental & WEEE Compliance Statement

Our organization is committed to a zero-landfill e-waste target. All non-reusable electronics must be processed through Environment Agency licensed facilities under the WEEE Directive, ensuring ethical component recovery and hazardous material handling.

Policy Adoption & Governance Approval

IT / SECURITY LEAD SIGNATURE:

DATA PROTECTION OFFICER (DPO):

APPROVAL DATE & STAMP:

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