

INGOLD SOLUTIONS GMBH

Storage Disposal Policy

(Ref No: - ISMS/IS/5.2/16)

1. 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 addition, hard drives, USB drives, CD-ROMs and other storage media contain various kinds of **INGOLD SOLUTIONS GMBH** data, some of which is considered sensitive. In order to protect our constituent's data, all storage mediums must be properly erased before being disposed of. However, simply deleting or even formatting data is not 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.

2. Purpose

The purpose of this policy is to define the guidelines for the disposal of technology equipment and components owned by **INGOLD SOLUTIONS GMBH**.

3. Scope

This policy applies to any computer/technology equipment or peripheral devices that are no longer needed within **INGOLD SOLUTIONS GMBH** including, but not limited to the following: personal computers, servers, hard drives, laptops, mainframes, smart phones, or handheld computers, printers, scanners, compact and floppy discs, portable storage devices, backup tapes, printed materials.

All **INGOLD SOLUTIONS GMBH** employees and affiliates must comply with this policy.

4. Policy

4.1 Technology Equipment Disposal

- 4.1.1 When Technology assets have reached the end of their useful life they should be sent to the **INGOLD SOLUTIONS GMBH** Equipment Disposal Team office for proper disposal.
- 4.1.2 The Equipment Disposal Team will securely erase all storage mediums in accordance with current industry best practices.
- 4.1.3 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 Department of Defense standards.

INGOLD SOLUTIONS GMBH

- 4.1.4 No computer or technology equipment may be sold to any individual other than through the processes identified in this policy.
- 4.1.5 No computer equipment should be disposed of via skips, dumps, landfill etc. Electronic recycling bins may be periodically placed in locations around **INGOLD SOLUTIONS GMBH** . These can be used to dispose of equipment. The Equipment Disposal Team will properly remove all data prior to final disposal.
- 4.1.6 All electronic drives must be degaussed or overwritten with a commercially available disk cleaning program. Hard drives may also be removed and rendered unreadable.
- 4.1.7 Computer Equipment refers to desktop, laptop, tablet or notebook 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.
- 4.1.8 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.
- 4.1.9 Technology equipment with non-functioning memory or storage technology will have the memory or storage device removed and it will be physically destroyed.
- 4.2 Employee Purchase of Disposed Equipment
 - 4.2.1 Equipment which is working, but reached the end of its useful life to **INGOLD SOLUTIONS GMBH** , will be made available for purchase by employees.
 - 4.2.2 A lottery system will be used to determine who has the opportunity to purchase available equipment.
 - 4.2.3 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.
 - 4.2.4 Finance and Information Technology will determine an appropriate cost for each item.
 - 4.2.5 All purchases are final. No warranty or support will be provided with any equipment sold.
 - 4.2.6 Any equipment not in working order or remaining from the lottery process will be donated or disposed of according to current environmental guidelines.
 - 4.2.7 Information Technology has contracted with several organizations to donate or properly dispose of outdated technology assets.
 - 4.2.8 Prior to leaving **INGOLD SOLUTIONS GMBH** premises, all equipment must be removed from the Information Technology inventory system.

INGOLD SOLUTIONS GMBH

5. Policy Compliance

5.1 Compliance Measurement

The **INGOLD SOLUTIONS GMBH** 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.

5.2 Exceptions

Any exception to the policy must be approved by the Infuse Team in advance.

5.3 Non-Compliance

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

6 Related Standards, Policies and Processes

None.

7 Definitions and Terms

None.

Issue Date :	Maintained by	Approved By
May, 2023	INGOLD SOLUTIONS GMBH IT Team	
Last update on May, 2023		
Next update on May, 2023		