



PriorityWaste[®]

Your waste is our priority

PRIORITY WASTE – DATA DESTRUCTION POLICY

Version: 2.0

Issued: 28/11/25

Next Review: 28/11/26

Approved By: **Gary Cronnolley – Compliance & Sales Director**

1. Purpose

The purpose of this Data Destruction Policy is to ensure that all data-bearing devices handled by Priority Waste Limited are processed, destroyed, and recycled in a manner that guarantees complete data security for our clients.

This policy outlines strict operational, physical, and procedural controls designed to prevent unauthorised access, loss, misuse, recovery, or disclosure of any client data from electronic devices, hard drives or other digital storage media.

This policy supports compliance with UK GDPR, the Data Protection Act 2018, and the principles of secure data handling.

2. Scope

This policy applies to:

- All Priority Waste employees, drivers, warehouse operatives and contractors
 - All data-bearing devices handled by Priority Waste including:
 - Hard Disk Drives (HDD)
 - Solid State Drives (SSD)
 - Servers and RAID arrays
 - Laptops, desktops, tablets, mobile phones
 - USB drives and external storage
 - Tapes, CDs, DVDs, SIM cards and memory cards
 - All WEEE streams containing storage components
 - All inventory-based and non-inventory data destruction services
-

3. Responsibilities

3.1 Compliance & Sales Director – Gary Cronnolley

Responsible for ensuring the implementation and enforcement of this policy, and that staff follow all required security requirements.

3.2 Operations Director

Responsible for:

- Secure workflow management
- Maintaining shredding equipment
- Ensuring controlled access to the shredding zone
- Routine compliance checks

3.3 Warehouse & Shredding Operatives

Must:

- Handle devices with strict chain-of-custody care
- Ensure all devices are processed only within approved secure areas
- Follow full scanning, logging and destruction procedures
- Report any irregularities or suspected data security risks immediately

3.4 Drivers

Must:

- Secure all data-bearing devices during transport
- Deliver them directly to the secure data destruction zone upon arrival
- Complete required documentation and handover checks

4. Chain of Custody – Receipt to Destruction

Priority Waste follows a controlled, auditable chain-of-custody from collection to destruction. This includes:

4.1 Collection

- All data-bearing devices are transported in sealed or secured containers.
- Drivers must confirm receipt quantities on collection paperwork.
- Discrepancies must be reported immediately.

4.2 Arrival at Priority Waste

- Devices are booked into the warehouse and transferred to the secure data handling area.
- Access to this area is restricted to authorised personnel only.

4.3 Inventory Logging (Where Applicable)

If the client's service level includes full asset reporting:

- Each device is scanned onto an inventory.
- Details recorded may include:
 - Manufacturer
 - Model
 - Serial number
 - Associated asset/device
- Any unidentified or damaged devices are logged separately for review.

5. Secure Data Destruction Process

Priority Waste operates a strict and documented destruction workflow:

5.1 Preparation

- All devices are moved into the secure shredding area.
- Devices are collated, checked against inventory (if applicable), and prepared for final destruction.
- No device may leave the secure area once received.

5.2 Physical Destruction

All data-bearing devices are destroyed using industrial shredding equipment.

- Devices are shredded down to a particle size of **38mm**.
- Materials such as HDDs, SSDs, tapes, CDs, DVDs, SIM cards and memory cards are all physically destroyed.
- Shredding equipment is calibrated and maintained to ensure consistent destruction size.

5.3 Recycling

After destruction, materials are:

- Segregated into metal, plastics, and mixed material fractions
- Sent to authorised downstream recycling partners
- Processed in accordance with WEEE and environmental regulations

5.4 No Data Device Reuse Policy

Priority Waste prohibits:

- Reuse
- Resale
- Re-deployment
- Data wiping for resale

of any devices unless explicitly authorised under a pre-agreed contract (rare exceptions only).

The default standard is **complete destruction**.

6. Certificates & Documentation

Priority Waste issues:

- Certificate of Destruction (COD)
- Certificate of Data Destruction (where included)
- Inventory Report (where applicable)
- Weight or unit totals for audit purposes

Documentation is retained for **six years**.

7. Security Controls

7.1 Physical Security

- CCTV throughout the shredding and secure data handling area
- Restricted access zones
- Visitor control and sign-in procedures
- Locked storage for devices awaiting destruction
- Secured overnight storage

7.2 Operational Security

- Staff training on data protection and secure device handling
- No personal electronics in the shredding room
- Immediate reporting of dropped, damaged or unknown devices
- Controlled movement of devices between stages

7.3 Transport Security

- Vehicles kept locked during transport
- Devices must not be left unattended
- Sealed containers for higher-security service levels

8. Non-Conformance & Incident Reporting

Any suspected breach, loss, or unauthorised handling of data-bearing devices must be reported immediately to the Operations Director and Compliance & Sales Director.

An NCR will be raised for:

- Missing devices
- Unlogged or unidentified items
- Devices found outside authorised areas
- Incorrect destruction size
- Equipment malfunction
- Procedural breaches

Corrective action will follow.

9. Customer Audits & Transparency

Priority Waste supports:

- Customer site visits
- Process audits
- Viewing of shredding (pre-booked)
- Review of inventory logs and CODs

Advance booking is required.

10. Policy Review

This policy will be reviewed annually, or sooner if:

- Legislation changes
- New shredding equipment is introduced
- A data security incident occurs
- Process changes require it

11. Acknowledgement

All employees must read and understand this policy and follow the PPE requirements at all times.

Signed:



Gary Cronnolley
Compliance & Sales Director
Priority Waste Limited

Date: 23rd September 2025