

System Document		Kinyo Virginia, Inc.		
Technology Equipment Disposal Policy				Issue: ITP021
Date: 07/12/2022	Approved: F. Koshiji	Issued by: I.T. Department	Revision: 001	Page 1 of 2

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 Kinyo data. Some of which is considered sensitive. 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 Kinyo Virginia, Inc.

3. Scope

This policy applies to any computer/technology equipment or peripheral devices that are no longer needed within Kinyo including, but not limited to the following: personal computers, servers, hard drives, laptops, smart phones, or handheld computers (i.e., Windows, Mobile, iOS or Android-based devices), 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 Kinyo 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 I.T. Department office for proper disposal.
- 4.1.2 The I.T. Department 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 every disk sector of the machine with zero-filled blocks, meeting Department of Defense standards.
- 4.1.4 No computer or technology equipment may be sold to any individual other than through the process identified in this policy (section 4.2 below).
- 4.1.5 Assets: Depreciation related to capital expenses (computer software and hardware) may account as an income tax deductible enabling us to reduce our profit taxes. To do this our Finance Department must know what each capital expense is in detail when any of Kinyo's computer software or hardware is in process of disposal, see Capital Expense "System Work Instruction (WI-S5-4) Planning, section 7, Budget Planning".

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- 4.1.6 No computer equipment should be disposed of via skips, dumps, landfill, etc. Electronic recycling bins may be periodically placed in locations around Kinyo. These can be used to dispose of equipment. The I.T. Department will properly remove all data prior to final disposal.
- 4.1.7 All electronic drives must be degaussed or overwritten with a commercially available disk cleaning program. Hard drives may also be removed and rendered unreadable (drilling, crushing, or other demolition methods).
- 4.1.8 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 switched, routers, wireless access points, batteries, backup tapes, etc.
- 4.1.9 The I.T. Department 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.
- 4.1.10 Technology equipment with non-functioning memory or storage technology will have the memory of 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 Kinyo Virginia, Inc. will be made available for purchase by employees.
- 4.2.2 A lottery system will be used to determine who could 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 purchase is 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 information.
- 4.2.7 Technology has contracted with several organizations to donate or properly dispose of outdated technology assets.
- 4.2.8 Prior to leaving Kinyo Virginia Inc., premises, all equipment must be removed from the I.T. inventory system.

5. Policy Compliance

- 5.1 Compliance Measurement:** The I.T. department 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 I.T. department.
- 5.2 Exceptions:** Any exceptions to the policy must be approved by the I.T. department in advance.