



Disposal Policy

This Policy applies to all Wonde Limited employees, agency staff, subcontractors and other third parties who undertake activity for and on behalf of Wonde Limited.

It reflects the Directive 2012/19/EU of the European Parliament and Council of 4 July 2012 on waste electrical and electronic equipment (WEEE). It applies to the disposal and transfer of media including hardware, software and paper based information unless otherwise specified.

Purpose

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure Wonde carries this out consistently and that we fully document any actions taken.

Responsibility

All employees including agency staff and third party suppliers are required to adhere to Wonde's disposal policy overseen by the Chief Technology Officer.

Policy

In line with our Environmental Policy, Wonde operates graduated options of disposal. Internal and external repurposing or resale is the first preference for disposal. Prior to which, all data will be sanitized by the IT team in line with statutory requirements.

Hardware

The process of the secure disposal of media that has contained or does contain data or information from, but not limited to: hard drives from any PC, laptop, file server, printer/photocopier (MFU), tablets or Smartphones will be the responsibility of the IT Team. Physical removal of hard drives, including SSD, will be the responsibility of the IT Team.

Hard drives will be sanitized by the IT Team of all data and reformatted multiple times before a new user accepts any reassigned device.

The physical data storage device will be physically destroyed by drilling and bending, shredding or incineration. This will be carried out on-site or by approved third party suppliers. The hardware remains will then be disposed of as required by the WEEE directive (2012). Documentation will list the device serial number and data destroyed, as a minimum.

The IT Team will ensure hazardous waste will be managed in line with statutory requirements.

Paper based information

In accordance with our Environmental Policy, Wonde are committed to reducing the use of paper and encourage use of cloud based working. With regard to paper records, these should be kept for as long as they are needed to meet the operational needs of the Company, together with legal and regulatory requirements. We will regularly assess our records to:

- determine their value as a source of information about the Company, its operations, business relationships and environment,
- assess their importance as evidence of business activities and decisions
- establish whether there are any legal or regulatory retention requirements (including but not limited to: Public Records Act 1958, Data Protection Act 2018, the Freedom of Information Act 2000 and the Limitation Act 1980).

Following assessment, data, reports and information stored on paper shall be destroyed at the end of its life by a Confidential Waste contractor. Temporary storage in confidential paper (waste) bins are available around the offices. This secured waste shall be transported to a secure off-site depot for destruction by

shredding or incineration or destroyed (by shredding) within a secure vehicle close to the Wonde site.

The supplier of these services will be managed by the Office Manager. The contractor carrying out secure destruction of hardware and paper-based media shall be certified in the appropriate manner (that is, in accordance with ISO27001).

Under no circumstances should physical storage and media be used or transferred.

This policy and the actions arising from it will be annually reviewed by the Wonde Executive Team.