

Provali Asset Disposal Policy



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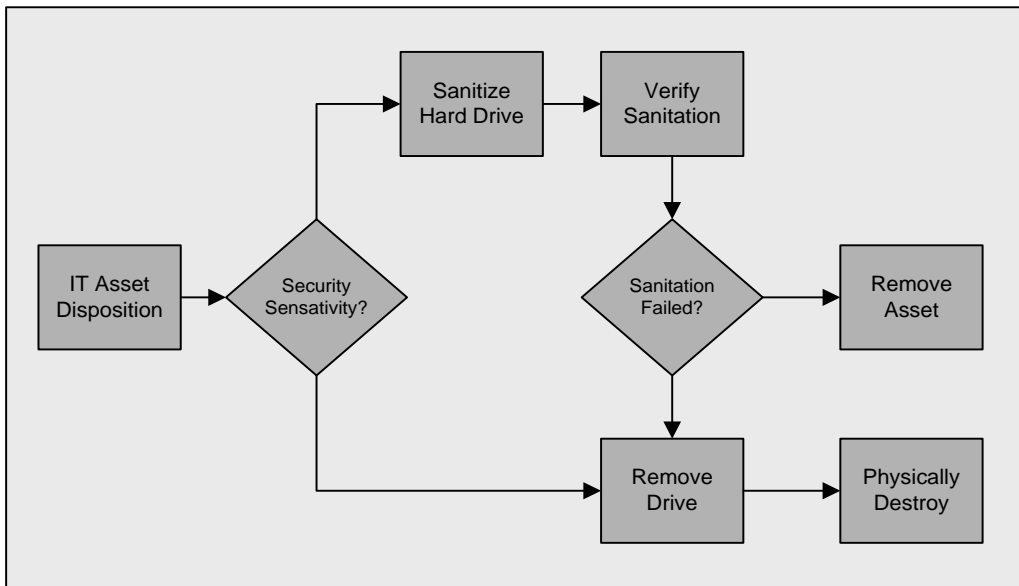
PROVALI Asset Disposal Policy

We recommend indentifying and retaining a firm that specializes in disposing of equipment in an environmentally friendly and regulatory-compliant way. In the United States, the Environmental Protection Agency has regulations and guidelines regarding the disposal of the toxic substances found in electronics. In addition to the EPA, Sarbanes-Oxley and other governmental regulations require measures to be taken around data and system security. The firm retained to dispose of IT assets should be thoroughly reviewed to assess their compliance with these concerns. Specific information for the two aspects of proper IT asset disposal is:

Security Regulations –

Security regulations apply primarily to the data located on the asset being disposed of. The process of removing data from the asset before disposal is often overlooked, but is vital to protecting the business from legal action and compliance violations.

Security Disposal Process



All of the data on the asset should be classified based on the sensitivity of the data. For example, Social Security Numbers compared to Blog entries. Based on the data located in the device an appropriate disposal method should be used:

Data Sensitivity	Description	Sanitization Method
Level 1	Unclassified, data that is publically available and contains no sensitive material.	No disposal is required
Level 2	Sensitive data such as personal emails or information	Reformatting or degaussing
Level 3	Secret information such as banking or address information	Deletion using an approved technique
Level 4	Classified information such as Social Security Numbers or trade secrets	Physical destruction of the drive

Even though a third party firm may take ownership of an asset, much of the liability for the final disposal still remains with the original business. Failure to properly dispose of IT assets can lead to many negative repercussions. In addition to fraud and disruptions to business process, other legal repercussions of violating disposal laws and regulations can be enormous. Sarbanes-Oxley and HIPAA violations carry criminal penalties of up to \$250,000 and/or 10 years imprisonment per violation. Third party firms that dispose of Assets should provide a minimum of the following to satisfy security concerns:

- Maintaining strict physical inventory control and tracking that starts at the point of shipment through final disposition.
- Hiring direct route licensed bond carriers to transport disk drives.
- Ensuring that once disk drives are received at the disposal partner’s facilities they are verified, tested and assigned a unique customer specific control tracking work number.
- Removing all company specific labels and identification tags.
- Ensuring that data erasure procedures are completed in accordance to U.S Department of Defense 52220.22M standards.
- Receiving a Certificate of Erasure (COE) and a Certificate of Destructions (COD) upon

Environmental Regulations –

IT assets are made up of a mixture of plastics, hazardous metals and other environmentally harmful substances. The EPA and state agencies have several regulations in place that control how IT assets are disposed of. In order to comply with regulations the assets must be disposed of at an approved facility by approved methods. To assure compliance with the regulations the third party firm should provide:

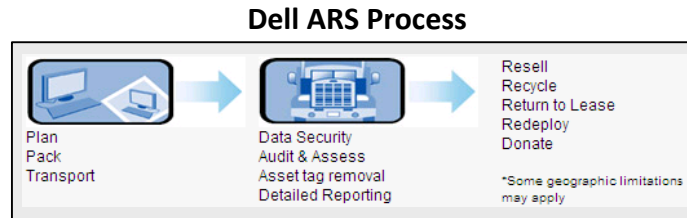
- Certification of proper disposal techniques
- Documentation of the receipt of the asset

- Maintain documentation of custody from receipt to the disposal at an approved facility
- The name and location of the approved facility

Other Disposal Services

Dell ARS –

Dell Asset Recovery Service (Dell ARS) provides IT Asset disposal to clients throughout most locations. Dell’s disposal process includes on-site packaging, transportation, sanitization, and disposal of IT assets. Their process has been certified by IDC’s G.R.A.D.E . as an environmentally friendly and secure process.



Partner –



IBM uses best in class practices to remove, sanitize, and dispose of client assets. In 2008 they were awarded IDC’s G.R.A.D.E. for their disposal and sanitization process. All work done conforms to Department of Defense standards and can be customized when desired. Compliance documentation for the entire process is also provided as proof of disposal methods.