



AN INTRODUCTION TO CDL



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1 Introduction

1.1 About CDL

Thank you for downloading our introduction pack and welcome to Computer Disposals Ltd.

The purpose of this document is to provide you with a brief overview of our services, to include supporting documentation in the form of sample asset reports and data erase certification through to our licenses and accreditations.

As a brief introduction, CDL was established in 1999 and has since evolved into one of the UK's leading asset retirement specialists. Our commitment to delivering the highest level of customer service is borne out by our client retention rate of 94% since 1999.

There are many so called IT disposal specialists, so what differentiates CDL from the competition?

- Full UK coverage with no minimum collection quantities
- Use our own satellite tracked vehicles and DBS vetted drivers
- All vehicles have HD CCTV cameras installed, forward facing and load facing
- On and off-site data sanitisation options
- Individual data erase certification for every hard drive
- Comprehensive asset reporting
- Fully GDPR compliant

1.2 Accreditations and Awards

- Waste Carrier Licence
- DPA Registered
- Full Environmental Permit
- ATF (Authorised Treatment Facility)
- ISO 9001:2015
- ISO 14001:2015
- ISO 27001:2013
- ISO 45001:2018
- Secure Data Erase Company of the year 2017, 2018 and 2019
- Secure Company of the Year 2018
- Compliance Award Winner 2018
- Halton Business of the Year 2017
- Halton BID Business of the year 2018
- DBS checked staff
- Safe Contractor accredited
- Investors in People Accredited
- ADISA accredited with Distinction (Asset Disposal & Information Security Alliance)
- Members of ICER (Industry Council for Electronic Equipment Recycling)
- NHS Data Security and Protection Toolkit approved and compliant

1.3 Insurances

- Public Liability £10,000,000
- Employee Liability £10,000,000
- Cyber Security £10,000,000
- Professional Indemnity £500,000

2 Management Capability

Waste Management Licence Number	EAWML 402764
Environmental Permit Reference	EPR/BB3505UA/A001
Waste Carrier Licence Number	CBDU107046
AATF Approval Number	WEE/FZ0002ZS/ATF
Safe Contractor Membership Number	IT2040
T11 Exemption	NCC/060540
SIC Code	62090
ISO 9001:2015	DAS 57268339/0/Q Rev: 002
ISO 14001:2015	DAS 61433486/0/E Rev: 002
ISO 45001:2018	DAS 26261957/0/O Rev: 002
ISO/IEC 27001:2013	DAS 48198577/0/I Rev: 001
Company Registration Number	4033271
VAT Number	768212420
DUNS Number	220307081

3 Our Approach

3.1 Client Engagement

To guarantee the highest level of service we would recommend establishing a central point of contact within your organisation to co-ordinate all collections and be the primary contact for the return of asset reports.

If you wish to appoint more than one contact, we recommend establishing a group email address that encompasses all personnel responsible for managing the account from both CDL and your organisation.

CDL will supply a generic GDPR compliant disposal form enabling us to capture your disposal and collection requirements.

3.2 Dedicated Account Manager

Your organisation will be allocated a dedicated account manager. Your account manager will be responsible for all disposal enquiries, collection bookings and day to day service enquiries. CDL will also appoint a secondary account manager who will be responsible for the day-to-day management of your account in the absence of your primary account manager.

Your Account Manager will also be responsible for checking all asset reports prior to being forwarded to the designated contact or group email address.

3.3 Client Locations

CDL will collect from any UK location. Please note that surcharges may apply for collections from non-mainland UK locations.

3.4 Service Levels

The following service levels will apply:

- All collection requests will be acknowledged via email within 2 hours
- All mainland UK collections will be completed within 5 working days
- All asset reports including data erase certification for collections will be completed within 25 working days

3.5 Collection and Logistics

All collections will be carried out by CDL uniformed staff in CDL liveried vehicles. We operate the largest fleet of vehicles for a UK IT disposal company and all vehicles are replaced every 2 years.

We will confirm a date and time for each collection. CDL will provide all trolleys, crates and packaging equipment where appropriate and will assume responsibility for the handling of all equipment.

CDL will collect from multiple locations as part of a round robin collection, assuming all sites can be collected from within a single day. Equipment does not have to be palletised and can be stored loose or in cages/containers to suit the site. We will allocate tail lift vehicles from our fleet where appropriate to cater for larger items such as server racks, copiers, plotters etc.

CDL will collect from multiple client sites with one vehicle, unless otherwise agreed with the client. All collections are segregated on our vehicles to ensure disposals are not mixed up with other assets.

3.6 Equipment Schedule

Upon collection, CDL will split the items into two categories, Assets and Waste. By categorising items as assets, rather than waste, CDL is able to adhere to the Waste Hierarchy and not classify items as waste until we have confirmed that these items cannot be re-used and/or refurbished.

The agreement will encompass all forms of IT related assets and waste but, for clarity, CDL will only class the following items as Data Bearing. If you have a specific equipment type which you believe is data bearing and not part of the list below then this can be agreed and specifically categorised as such for your business.

Item Type	Data Bearing / Non-Data Bearing	Initial Item Classification
Apple Mac Equipment	Data Bearing	Asset
Back-Up Devices	Data Bearing	Asset
Combi PC	Data Bearing	Asset
Copiers / Plotters	Data Bearing	Asset
Desktop PC	Data Bearing	Asset
Laptop	Data Bearing	Asset
Loose Hard Drives	Data Bearing	Asset
Loose Media – Data Tapes / CD ROMs	Data Bearing	Asset
Mobile Phones and Tablets	Data Bearing	Asset
Point of Sale Equipment	Data Bearing	Asset
Printer / Fax	Data Bearing	Asset
Servers / Storage Arrays	Data Bearing	Asset
Switches / Routers	Data Bearing	Asset
Telephony Equipment	Data Bearing	Asset
Terminals / Thin Client	Data Bearing	Asset
Audio / Visual Equipment	Non-Data Bearing	Asset
Batteries	Non-Data Bearing	Waste
CRT Monitors	Non-Data Bearing	Waste
Televisions	Non-Data Bearing	Asset
Fluorescent Tubes	Non-Data Bearing	Waste
Medical / Testing Equipment	Non-Data Bearing	Asset
TFT / LCD Monitors	Non-Data Bearing	Asset
Toners	Non-Data Bearing	Waste
UPS	Non-Data Bearing	Asset
Associated Peripheral Items	Non-Data Bearing	Asset

3.7 Waste/Asset Transfer and Collection Notes

CDL will supply an 'Asset Disposal Request' form for all collections. We recommend this form should be completed to comply with GDPR regulations and ensure CDL have all the correct details for the collection. This form should be returned to the account manager.

In terms of reporting, and dependant upon the equipment that is collected, CDL will upload to the portal and send the following documentation electronically at the time of collection;

- **Processing Contract** (Applicable for small to medium companies that do not have a main contract covering all collections)
- **Collection Summary** (A comprehensive count of equipment and quantities collected)
- **Asset Transfer Note** (This will detail the EEE collected from site (if applicable))
- **Hazardous Waste Collection Note** (This will detail the hazardous WEEE collected from site (if applicable))
- **Duty of Care Transfer Note** (This will detail the non-hazardous WEEE collected from site (if applicable))

Please note that all responsibilities and liabilities are passed to CDL on the day of collection once the transfer documents have been signed.

3.8 GDPR Compliance

With regards to UK government GDPR compliance you, the controller, must make sure the following mandatory conditions are met:

- Whenever a controller uses a disposal company it needs to have a written contract in place
- Controllers are liable for their compliance with the GDPR
- Controllers must only appoint a disposal company who can provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects protected.

In addition to the above GDPR legislation, CDL also recommends that clients follow a 'best practice approach' to ensure further GDPR compliance, which is as follows:

- The client should have a record by minimum of serial numbers of all data bearing assets, as listed in schedule 3.5.1, that have been authorised for disposal, prior to the equipment being collected by the service provider.
- The client should demonstrate that they have performed appropriate due diligence on the service provider they have chosen and their scope of service to include security and data sanitisation processes. A site audit is preferable.
- When collecting equipment, the client must allocate a person with appropriate authorisation to release the equipment and sign the appropriate paperwork.

3.9 Audit Trail

CDL employs a comprehensive audit trail. A unique job number is raised for each collection on the day prior to collection. The unique job number is allocated to the collection throughout the entire process.

On the day of collection, the CDL driver will take an inventory count for all data bearing items. This will be checked off against the disposal summary form, which ensures that assets are not collected in error. Should we receive a disposal summary form with serials or customer assets we will check off items electronically with a barcode scanner.

Once completed, the job is collated by the warehouse manager and office staff instructed accordingly. Jobs are then exported into Excel, quality checked by the account manager and forwarded to the customer.

3.10 Retirement Process

Once returned to CDL, the equipment will be weighed and the part E of the waste transfer documents and CDL internal system updated accordingly. In line with the customer service level the job will be allocated to a specific engineer who will assume responsibility for his/her element of the job. Equipment that is not deemed beyond economic repair will be subjected to a functionality test. At this point every item of equipment is bar-coded and allocated its own unique CDL asset number to facilitate future audit trails. In terms of data erasing, the engineer's initials are inputted into every data erase certificate, in addition to the unique job number. Equipment ID, specification and details of condition are taken and uploaded into the asset report. Equipment that is in working order will be refurbished and forwarded for resale

3.11 Data Capability

CDL will sanitise items to a standard level using the following methods;

Media Type	Non-destructive Sanitisation	Standard Level Destruction
Magnetic Hard Drives	Erase using Whitecanyon Wipedrive using HMG IS5 Enhanced algorithm	Shred to 40mm High level shred sizes available
Solid State Hard Drives	Erase using Whitecanyon Wipedrive using NIST 800-88r1 algorithm	Shred to 40mm High level shred sizes available
Magnetic Back-up Tapes	N/A	Shred to 20mm
Mobile Phones / Tablets	Erase using BlackBelt Datawipe using ADISA claims tested algorithm	Shred to 40mm High level shred sizes available
Paper / CDROM / Floppy Disks	N/A	Kobra 430TS TS Shredder
Printers / Copiers	N/A	Shred to 40mm High level shred sizes available
Routers and Switches	Reset to factory default following manufacturer's instructions.	Remove board and shred to 40mm High level shred sizes available

In the event that non-destructive sanitisation method fails, media will be physically destroyed.

CDL also offer higher level destruction options which are available on request. Details of all sanitisation options can be found of CDL's data capability statement available from:

<http://www.computerdisposals.com/datacapability.pdf>

3.12 Data Removal

All Hard Disk Drives (HDD) which are 250 GB or above will be erased using White Canyon overwriting software. White Canyon is the only overwriting software in the world certified to NIAP Common Criteria EAL 4+ and is CPA (NCSC) approved for all mechanical drives and is ADISA approved for Solid State Drives. It is also the only software approved by the likes of Interpol, Homeland Security, IBM, Microsoft and Cisco. Full accreditation details are available upon request.

A certificate will be produced for every successfully erased hard drive to include the make, model and serial number of the hard drive. Any hard drive that fails the data erase process or is less than 250 GB will be shredded on site at CDL. If the original equipment is faulty, the drive is removed and shredded.

All loose media is degaussed and/or shredded on-site at CDL.

3.13 On-site media destruction (optional)

CDL can offer an on-site media destruction service using our dedicated media destruction vehicle. The vehicle can offer a destruction option for all media types. Full details of this service can be found on CDL's data capability statement.

All destroyed media will be returned, same day, to our facility under strict security conditions.

3.14 Asset Reports

CDL will provide a comprehensive asset report, providing the following information:

- Make and model of equipment
- Specification of equipment
- Serial number
- Client asset number
- CDL asset number
- Confirmation of equipment functionality/condition (Grade)
- Individual certificates for data erased hard drives
- A weight summary of items collected

Asset reports will be provided electronically. Copies of data erase certificates will be provided electronically and included within the asset report.

A sample asset report extract is shown below:

CDL Computer Disposals Limited												
Asset Inventory Report - Desktop												
Customer:	New Customer											
Collection Date:	25-Jan-18											
Job Number:	J012345											
CDL Asset	Item Description	Serial Number	Customer Asset	Grade	Processor	Generation	Processor Qty	Memory	Hard Drive	Secure Destruction	Data Erased	
D0420484	DELL OPTI PLEX 7010	17258X1	R00186	A	INTEL I5	3rd Gen	1	4 GB	500 GB	NO	YES	
D0420485	DELL OPTI PLEX 790	2Q6895J	R00732	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420486	DELL OPTI PLEX 790	9Q6895J	R01120	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420487	DELL OPTI PLEX 7010	G9258X1	R01216	A	INTEL I5	3rd Gen	1	4 GB	500 GB	NO	YES	
D0420488	DELL OPTI PLEX 790	4Q6895J	R00509	C	INTEL I5	2nd Gen	1	4 GB	500 GB	YES	NO	
D0420489	DELL OPTI PLEX 790	D5Q995J	R00527	C	INTEL I5	2nd Gen	1	4 GB	500 GB	YES	NO	
D0420490	DELL OPTI PLEX 790	1D8CH5J	R01299	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420491	DELL OPTI PLEX 790	G96895J	R00172	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420492	DELL OPTI PLEX 790	256895J	R00310	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420493	DELL OPTI PLEX 790	4R6895J	R01162	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420494	DELL OPTI PLEX 790	2R6895J	R00787	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420495	DELL OPTI PLEX 790	9T6895J	R00760	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420496	DELL OPTI PLEX 7010	2D8CH5J	R01218	C	INTEL I5	3rd Gen	1	4 GB	500 GB	YES	NO	
D0420497	DELL OPTI PLEX 790	7RQ895J	R00220	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420498	DELL OPTI PLEX 790	4T6895J	R00741	A	INTEL I5	2nd Gen	1	4 GB	500 GB	NO	YES	
D0420499	HP ELITE PRO 6000	CZC0500BZX	N/A	A	CORE2DUO	N/A	1	4 GB	500 GB	NO	YES	
D0420500	HP ELITE PRO 6000	CZC13149F5	N/A	A	CORE2DUO	N/A	1	4 GB	500 GB	NO	YES	
D0420501	DELL OPTI PLEX 780	B2F7M4I	R00451	A	CORE2DUO	N/A	1	4 GB	250 GB	NO	YES	
D0420502	HP WORKSTATION Z230	CZC5090CVZ	N/A	A	XEON E5	N/A	2	16 GB	1 TB	NO	YES	

Figure 1 - Asset Report Example

3.15 Data Erase Report

An individual data erase report is produced for every hard drive that passes the sanitisation process. This report also includes machine specifications and a functionality test.




Hardware Information	
Computer	Vendor: Hewlett-Packard, Model: HP Compaq dx2420 Microtower, Serial CZC9323V3K
Motherboard	Vendor: MSI, Model: 2A78h
Processor	Pentium(R) Dual-Core
RAM	2048 MB, Memory banks filled Unavailable/1, DDR2 DIMM
NIC	Realtek Semiconductor Co., Ltd., RTL8101E/RTL8102E PCI Express Fast Ethernet controller, MAC address: 00:24:21:b2:75:96
DVD-RAM writer	DVD-RAM GH40L
Drive 1	Vendor: Hitachi, Model: Hitachi HDT721032SLA380, Serial: STA2L7MV028AMD, Size: 320.07 GB, Pre-wipe SMART health status: PASSED, Post-wipe SMART health status: PASSED
Display Adapter	Vendor: Intel Corporation, Model: 82G33/G31 Express Integrated Graphics Controller
Multimedia Adapter	Vendor: Intel Corporation, Model: NM10/ICH7 Family High Definition Audio Controller
USB Ports	USB Ports: 4, USB2 Ports: 1, USB3 Ports: 0
Hardware Tests	
Motherboard	Pass
Processor	Pass
Memory	Pass
Wipe Information	
Wipe Method	HMG IS5 - Enhanced
Software used	WipeDrive Enterprise 8.1.2
Kernel Version	4.4.39-gentoo
Job UUID	E8A42D49-CF01-43A6-8ACE-582069A3F0E0
User name	Jude Carson
Computer ID	D0394125
Job fields	
Job Number	J025324
Target Drive	
1 - Vendor: Hitachi, Model: Hitachi HDT721032SLA380, Serial: STA2L7MV028AMD, Size: 320.07 GB, Pre-wipe SMART health status: PASSED, Post-wipe SMART health status: PASSED	
Action Result	SUCCESS
UUID	C9605A5C-88E4-4321-B408-2E1B501E3873
Time started	Wednesday, 01 Nov 2017 at 02:12:05
Duration	04:10:52
Dirty Sectors	0
Drive Errors Detected	0
DCO found / removed	No / No
HPA found / removed	No / No

Figure 2 - Data Erase Certificate

3.16 Additional reporting

CDL can also provide quarterly weight reconciliations as detailed below

Job Number	Item	Average Weight of Item KG	Number of Items Reused	Weight of Items Reused	Number of Items Recycled	Weight of Items Recycled KG	Total Haz Weight	Total Units Recycled	Weight of Recycled	Metals	Plastic	PCB	Other	Non - WEE
J001175	Combi PC	10		0		0	0	0	0	0.00	0.00	0.00	0.00	0.00
02-Aug	CRT	11.36		0	4	45.44	45.44	4	45.44	6.09	9.90	6.13	23.72	0.00
	Desktop	10	157	1570	81	810	2380	81	810	381.51	249.48	17.01	49.41	113.40
	Fluorescent Tubes	0		0		0	0	0	0	0.00	0.00	0.00	0.00	0.00
	General Equipment	3		0	16	48	48	16	48	22.61	14.78	1.01	2.93	6.72
	Laptop	4		0	48	192	192	48	192	90.43	59.14	4.03	11.71	26.88
	Non-Haz White Goods	50		0		0	0	0	0	0.00	0.00	0.00	0.00	0.00
	Printers	22.72	24	545.28		0	545.28	0	0	0.00	0.00	0.00	0.00	0.00
	Server	27.24		0		0	0	0	0	0.00	0.00	0.00	0.00	0.00
	TFT	5	3	15	39	195	210	39	195	0.00	0.00	0.00	0.00	0.00
	White Goods	50		0		0	0	0	0	0.00	0.00	0.00	0.00	0.00

3.17 Storage Containers

CDL can supply wheeled storage cages or pallet sized crates. In addition, CDL can supply protective coverings for TFT monitors. This helps to protect the monitors and their resale value. Provision of cages/containers and protective covers will be free of charge.

3.18 Security – CDL Premises

CDL has one of the highest rated security systems available covering the entire facility. The site perimeter is surrounded by 2.4-meter prison mesh fencing. The site is also covered by 30 x external and internal analytic, full colour night vision CCTV cameras and a further 35 x CCTV cameras with full PIR coverage, including 7 x PTZ cameras and an ANPR camera. Both the CCTV and alarm system are externally monitored 24/7 with a PA system and regular security patrols.

During working hours, a security guard is present throughout the day to make regular perimeter checks and conduct employee searches. All site gates and internal doors are access controlled with relevant permissions.

3.19 Security – Logistics

In terms of transport security, all vans are satellite tracked and monitored live on plasma screens situated in both the warehouse and office. All vehicles are fitted with live stream HD CCTV in both the cab and loading areas. All drivers are Enhanced DBS checked as a minimum. Driver and fuel stops must be carried out at services where CCTV is in operation, wherever possible.

3.20 Security - Staff

All staff are vetted, and DBS checked. Upon starting work at CDL all employees must pass a comprehensive 2-day induction course, including an online test of understanding. At which point they are allocated a 'work buddy' whom they must work alongside for a minimum of 2 weeks or when deemed competent to work alone, which must be signed off by their team leader. Employees are only allowed to process customer data after their 3-month probation has been completed. In addition to internal CCTV, CDL operates a right to search policy and operates daily random searches.

3.21 Sustainability

Contrary to popular belief the purpose of the WEEE Directive is to promote the re-use of redundant WEEE. The actual recycling of WEEE should be viewed as a last resort. The retirement process starts with the end user, who in line with the WEEE Directive has an obligation to look after redundant WEEE and ensure it is stored safely and with due care and attention. CDL can assist in this process by providing containers and protective covers for assets.

In terms of our own sustainability, CDL has invested heavily in a brand-new state of the art recycling facility. We have installed a Biomass system which provides all heating and hot water for the entire facility and runs on renewable energy. All lighting is intelligent PIR and LED throughout the facility. We have also registered for a solar panel installation with a target to become a carbon negative company.

3.22 Health & Safety

Health & Safety is a key area of our business and is addressed in detail for every element of the business process from collections through to processing of equipment. Our approach to health & safety has evolved over the years via our own accreditations and demands from our customers. Health & Safety is an integral part of any employee's initial induction course.

If required, CDL will conduct a risk assessment and/or attend an induction for any site, prior to the first collection being completed from that site.

3.23 Equipment Recycling and Destination

CDL currently remarkets approximately 70% of all WEEE collected. The remaining 30% of WEEE is recycled here in the UK with all raw materials harvested for reuse. CDL has always guaranteed 0% landfill and does not export any non working WEEE.

3.24 Recycling Partners

With the exception of the final recycling and granulation process, every aspect of the retirement process is carried out at CDL's facility, including breaking equipment down to component level.