Technical and Organizational Measures for Shred-it
Last Updated: November 21, 2025

Taking into account the complexity, the costs of implementation and the nature, scope, context and purposes of processing, a, Shred-it, ("Shred-it") shall implement the following technical and organizational measures to ensure a level of security appropriate to the risks associated with the processing of the relevant data. In assessing the appropriate level of security, Shred-it considers the risks that are presented by processing from potential accidental or unlawful destruction loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.

This document describes technical and organizational security measures and controls implemented by Shred-it to protect personal data and ensure the ongoing confidentiality, integrity, and availability of Shred-it products and services.

Shred-it specializes in providing a data destruction service to enhance a business's compliance programme, ensuring that customer, employee, and confidential business information are always kept secure. Through Shred-it's strict chain-of-custody processes, hand-held technology, and reliable on-time, on-site and off-site shredding service, and a global network of local service facilities, Shred-it delivers secure destruction services for **customer confidential material (CCM)**. CCM includes paper, electronic storage media materials (e.g., DVDs, CDs, tapes, and hard drives), as well as other products (e.g., uniforms, shoes, and license plates) on a regular and ad-hoc basis.

On-Site Shredding and Recycling Process

Shred-it provides a secure on-site shredding service that is performed by a vetted **Customer Service Representative (CSR)** who will arrive at a customer location on a designated, pre-agreed scheduled date in a logo-marked shredding vehicle, wearing the Shred-it uniform, and displaying photo identification on the outer most layer of clothing.

STEP 1: CCM is placed into the secure locked containers by customer staff for safe keeping. Customer staff can place paper material, containing paper clips and staples, in the locked containers, as these will be shredded by Shred-it's powerful cross-cut shredders. Non-paper CCM (electronic storage media materials, etc.) are collected and destroyed separately.

STEP 2: Following a customer request, a Shred-it destruction truck arrives at a location on a pre-agreed schedule to ensure CCM and non-paper CCM is not stored by the customer longer than necessary.

STEP 3: The CSR will identify themselves to a designated customer contact. CSRs shall verify which containers are to be serviced through information provided on their handheld device and/or route sheet. Any changes to the information are recorded by the CSR during the service. The containers' contents are entirely removed from the locked containers and placed directly in a secured collection tote. The CSR's handling of the customers' papers, materials, and/or products is only for the physical transfer from one secured container to another and does not involve any examination of CCM or non-paper CCM. The handheld device will direct the CSR to all containers at the customer's site with the aim of not causing any disruptions to customer staff.

STEP 4: When the collection of items for destruction is complete, the CSR will re-lock each container and then obtain a signature from the designated customer contact using the handheld device. At this point, a Proof of Service (as defined below) displaying the number and type of units serviced for destruction is emailed to the designated customer contact.

STEP 5: The CSR will then return to the Shred-it destruction truck with the secured collection tote where the customer's collected items are loaded into the hopper of the shredder of the onsite truck and is destroyed into unrecognizable shredded material. The CSR will then depart the location after all of the customer's collected items have been destroyed.

STEP 6: At the end of the CSR's day, the unrecognizable shredded paper material is taken to Shred-it's secure service facility, where it is baled and transported to a paper mill to be recycled into household products. Destroyed electronic media and other non-paper CCM are disposed of in accordance with local requirements by partner vendors adhering to strict disposal requirements.

Off-Site Shredding and Recycling Process

Shred-it provides a secure off-site shredding and recycling service. This service is performed by a vetted CSR who will arrive at a customer location on a designated, pre-agreed scheduled date, in a logo-marked collection vehicle, wearing the Shred-it uniform, and displaying photo identification on the outer most layer of clothing.

STEP 1: The CCM is placed into the secure locked container by the customer's staff for safe keeping before destruction. Customer staff can put material containing paper clips and staples in Shred-it's containers, as these will be shredded by the powerful shredders. Non-paper CCM (electronic storage media materials, etc.) are collected and destroyed separately from paper.

STEP 2: As per the customer's schedule, Shred-it's collection vehicle will arrive at the customer's location on a pre-agreed schedule to ensure CCM are not stored longer than necessary .

STEP 3: The CSR will identify themselves to the customer's designated contact prior to emptying containers. CSRs verify which containers to be serviced through information provided on their handheld device or route sheet. Any changes to the information are recorded by the CSR during the service.

STEP 4: The CSR will re-lock each collection container and then obtain a signature from the customer's designated contact using the handheld device. At this point, a Proof of Service displaying the number and type of containers serviced for destruction is emailed to the contact.

STEP 5: All CCM will then be moved to Shred-it's secure collection vehicle. The storage area of the vehicle is then unlocked, and the CSR will move the material into the vehicle and secure the load. Once this is done, the CSR ensures the vehicle is locked and no access possible. Upon completion of the route the vehicle is returned to the Shred-it alarmed facility, where, the CSR unloads the vehicle into the secure warehouse.

STEP 6: All CCM are then shredded using a facility-based shredder.

All the unrecognizable shredded paper material is then baled within Shred-it's warehouse and transported to their pre-approved paper mill, where the material is recycled into household products, such as tissues and toilet rolls. Destroyed electronic media and other non-paper CCM are disposed of in accordance with local requirements by partner vendors

How we ensure confidentiality of our Shred-it Services:

Shred-it Secure Service – Shred Facilities
- All Shred-it service facilities adopt measures in order to ensure that all confidential materials taken for off-site destruction and recycling, are secure. When Shred-it's off-site service is utilized, confidential materials are kept in a highly secured facility Security measures include:

  1. CCTV recording equipment in place (for areas where legally permitted) to record all unloading, storage, and shredding areas, and retain footage for a designated period.
  2. Use of high security locks and restricted entry.
  3. All visitors sign in and out and sign a confidentiality agreement, stating they will abide by Shred-it procedures. All visitors then receive an orientation to ensure they are aware of site rules and are escorted at all times. Certain areas of Shred-it's operations are restricted and cannot be viewed by visitors.

Shred-it Vehicles
- All of Shred-it's on-site destruction vehicles carry on-board industrial proprietary multi–edge, cross-cut shredders, which shred the materials into fragments, which are then automatically mixed together in the rear of the vehicle by the shredder, ensuring all confidential material is illegible and very difficult to recreate into its original form.
- All vehicles used for transfer or destruction of customer's confidential materials are lockable.
  - All of Shred-it's owned or leased collection trucks are outfitted with an enhanced security package .
  - These units are decaled with the Shred-it logo and are locked at all times when unoccupied.
  - Except in the case of an emergency, no unauthorized person is permitted access to any part of the vehicle.
  - No unauthorized person shall be transported as a passenger at any time, except in case of an emergency.
- All CSRs carry out daily security checks on their vehicles prior to use and on their return;
- All Shred-it vehicles follow maintenance schedules, and an annual service plan.

- All vehicles are GPS tracked (according to applicable laws), allowing Shred-it to know where the CCM and non-paper CCM is at all times.

Shred-it Secure Equipment
- Shred-it has a variety of different sized lockable containers which can be supplied to customers to store confidential materials prior to destruction.
- **Shred-it Consoles** - Standard-sized, desk, and mini consoles are comprised with the following features:
  - Security Feed Slot - consoles have bevelled slots capable of accepting a relatively high quantity of documents at once while at the same time ensuring that papers cannot be retrieved by a human hand once deposited.
  - Key Operated Deadbolt Lock - only an authorized individual (Shred-It CSR or customer's designated employee) with a key can access the contents of the consoles.
- **Shred-it Totes (where available) - are comprised with the following features:**
  - Security Feed Slot - Standard lid with front paper slot and lock
  - Lockability - Hasp locking system or internal lid locking mechanism
  - Servicing Containers - the consoles will have either an internal cardboard liner or a nylon security bag to contain papers deposited. The Shred-it CSR will securely transfer the material from the liner or bag into a locked wheeled container which is used to carry the material to the truck. For the convenience of the customer's staff, stickers are placed on all consoles clearly displaying what can and cannot be placed inside, along with a number to call Shred-it's Client Care Associates, should they require support.

How we ensure integrity and availability of our services:

In addition to the above:

- **Risk Assessments**
  - We carry out periodic risk assessments of Shred-it's equipment and processes to ensure the safe and secure delivery of our services. This includes but not limited to, the review and use of all shredders, review of manual handling procedures, and a review of the operation of Shred-it vehicles.

- Proof of Service
  - As part of Shred-it's ongoing duty of care to its customers, on completion of the service, Shred-it will provide a Proof of Service to the customer. This confirms that Shred-it has taken steps to maintain the integrity of its collection for destruction process and fulfilled its duty of care in disposing of the CCM and non-paper CCM.
  - The Proof of Service is provided free of charge as part of the Shred-it service. The content on the Proof of Service will vary based on local regulatory and legal requirements and may display the following types of information:
    - The number of containers or equipment serviced.
    - The date and time of service.
    - Customer's contact name and signature.
    - Customer's address.
    - Shred-it's CSR's name and signature.
    - Shred-it's facility that will service the customer (where off-site processing occurs).
    - Shred-it's Waste Carriers License Number along with their Waste Exemption Reference Number.

- **Staff Vetting**
  - All Shred-it employees are screened prior to employment, in compliance to the requirements of BS 7858, to ensure their eligibility to perform their job responsibilities.
  - Upon commencement of employment and on an ongoing basis, all employees are required to read, agree to, and abide by Shred-it's confidentiality requirements, ensuring all employees are aware of their obligations and duties.

- **Shred-it Training**
  - Shred-it arranges and assesses competence of the individual prior to allowing them to undertake any services. Staff that carry out shredding services are trained with respect to appropriate data protection practices and handling of secure data.
  - All CSRs sign documents to confirm they have received training in vehicle incidents, personal accident procedures, manual handling/safe lifting, and safe shredder operation with all elements of the health and safety operations being evaluated by a supervisor.

- o All driving staff hold the required licenses or certifications necessary to operate their assigned vehicle and have been trained in-house to drive in a safe manner.

- **Data Security Incidents**
  - o Employees are trained to identify and ensure timely reporting of any data security incident.

How we regularly test / assess / evaluate the effectiveness of our technical and organisational measures for to help ensure the security of the processing:

In addition to the periodic risk assessments and ongoing training needs of staff as described above:

- **Compliance Review**
  - o Shred-it regularly reviews whether technical and organisational measures as outlined above are adequately implemented and adhered to by its employees.

- **Shred-it Accreditations & Memberships**
  - o Shred-it always strives to improve its services, and aligns to current legislation and industry best practices:

North America :
- o **NAID AAA Certified:** NAID AAA Certification verifies Shred-it's qualifications of certified information destruction provider through a comprehensive scheduled and unannounced audit program. AAA certification means Shred-it meets numerous laws and regulations requiring the protection of confidential customer information.

United Kingdom:
- o **ISO 9001: 2015 -** This quality management system certification enables Shred-it to demonstrate their commitment to service quality and customer satisfaction. Customers can be assured that Shred-it is continually improving their quality management systems and integrating the realities of a changing world.
- o **ISO 14001: 2015 -** This environmental management system certification demonstrates Shred-it's commitment to the environment. The standard provides guidelines on how Shred-it can manage the environmental aspects of their business activities more effectively, whilst taking into consideration pollution prevention, environmental protection, and socio-economic needs.
- o **BS EN 15713: 2023 -** This British Version of the European standard outlines controls for the secure destruction of sensitive and confidential material. It provides a comprehensive framework to cover the full lifecycle of the destruction process from collection to final destruction. Adherence to this standard provides assurances to Shred-it customers that their material is handled safely and securely.
- o **British Security Industry Association (BSIA) -** Shred-it has been a principal member of the BSIA since 2005. This is the trade association for the professional security industry in the UK. BSIA members are responsible for more than 70% of UK security products and services (by turnover) including the manufacture, distribution, and installation of electronic and physical security equipment, and the provision of security guarding and consultancy services. Being a member of this industry leading association ensures that Shred-it customers benefit from Shred-it being at the fore-front of new legislation.
- o **SAFEContractor -** This is a health and safety accreditation scheme for contractors. It simplifies the process of demonstrating to Shred-it customers that Shred-it has health and safety policies and procedures in place. This scheme assesses Shred-it's health and safety arrangements and their customers recognize the scheme and accept their SAFEContractor certificate as confirmation of competency.
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- o **Waste Carriers License Number Reference:** CBDU51993 (England and Wales), WCR/R/1137691 (Scotland) and ROC UT 681 9 (Northern Ireland).

Germany:
- o **DIN 66399** – Shred-it holds a DIN 66399 certification in Germany, which defines machine and process requirements for shredding paper and electronic media. This standard was developed by the Standards Committee for Information Technology and Applications (NIA) of the German Institute for Standardisation (DIN).