

TECHNICAL AND ORGANIZATIONAL MEASURES FOR SHRED-IT

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Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Stericycle, Inc. ("Stericycle") shall implement the following technical and organizational measures to ensure a level of security appropriate to the risks. In assessing the appropriate level of security, Stericycle considers the risks that are presented by processing from 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 Stericycle to protect personal data and ensure the ongoing confidentiality, integrity, and availability of Shred-it products and services.

Shred-it specializes in providing a tailored destruction service that allows businesses to comply with legislation and ensures 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, we deliver our 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 customers' 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 security 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. Staff can put paper material containing paper clips and staples in the containers as these will be shredded by Shred-it's powerful cross-cut shredders. Non-paper CCM (CDs, tapes, hard drives, etc.) are collected and destroyed separately from paper.

STEP 2: Per the customer schedule, a Shred-It destruction truck arrives at a location on a pre-agreed schedule to ensure confidential information is not stored longer than necessary.

STEP 3: Shred-it's CSR will identify themselves to a designated customer contact. Containers' bar codes are scanned using a handheld device to ensure that all bins are accounted for during the collection process. The bins' contents are entirely removed from the locked consoles 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 individual pieces. The handheld device will direct the CSR to all containers at the customer's site without causing any disruptions to customer staff.

STEP 4: When the collection of items for destruction is complete, Shred-it's CSR will re-lock each collection bin and then obtain a signature from the designated customer contact using the handheld device. At this point, a Certificate of Destruction displaying the number and type of units serviced for destruction is emailed to the designated customer contact.

STEP 5: Shred-It's 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 day, the unrecognizable shredded paper material is taken to Shred-it's secure CCTV-monitored service facility, where it is baled and transported to a paper mill to be recycled into household products such as tissues and toilet rolls. Destroyed electronic media and other non-paper CCM are properly disposed of in accordance with local requirements by partner vendors that have responsible disposal agreements to handle/reclaim.

Off-Site Shredding and Recycling Process

Shred-it provides a secure off-site shredding and recycling service. This service is performed by a security 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 process begins with CCM being placed into the secure locked container by the customer's staff for safe keeping before destruction. 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 (CDs, tapes, hard drives, 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 (in accordance with any data protection laws and regulations).

STEP 3: Shred-it's CSR will identify themselves to the customer's designated contact prior to emptying containers, ensuring the barcode of the unit is scanned using a handheld device to initiate the chain of custody for the collected information. The handheld device will direct Shred-it's CSR to all containers at the customers' site, causing no disruption to staff.

STEP 4: Shred-it's CSR will re-lock each collection bin and then obtain a signature from the customer's designated contact using the handheld device. At this point, a Certificate of Destruction displaying the number and type of units serviced for destruction is emailed to the contact.

STEP 5: All CCM will then be carried to Shred-it's secure collection vehicle. The storage area of the truck is unlocked, and the CSR will move the material into their vehicle and secure the load. Once this is done, the CSR ensures the truck is locked and no access can be gained. Upon completion of the route the vehicle is returned to the Shred-it 24-hour alarmed facility. Here, the CSR unloads the vehicle into the CCTV-monitored 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 properly disposed of in accordance with local requirements by partner vendors that have responsible disposal agreements to handle/reclaim.

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 containing an intruder alarm, which covers all shredding and storage areas, and is connected to an alarm receiving centre. All shredding facilities have 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.
- All external doors are secured with high security locks and have restricted entry. All doors are controlled by key fob activation systems only allowing entry to authorized personnel. Shred-it documents to whom key fobs are handed out to ensure that such are only in the possession of authorized personnel and are retrieved where necessary.
- 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 emergency procedures and site rules and are escorted at all times. Key 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 impossible to recreate into its original form.
- All vehicles used for transfer or destruction of customer's confidential materials are fully lockable.
 - All of Shred-it's owned or leased collection trucks are outfitted with an enhanced security package which can include the following: alarms systems, slam locks or high-security padlocks.

- These units are decalced with the Shred-it logo and are locked at all times when the CSR is not entering or exiting the vehicle.
- Except in the case of an emergency, no unauthorized person is permitted access to the cab, body, box, payload, or tail-lift of any vehicle.
- No unauthorized person shall be transported as a passenger at any time, except in case of an emergency.
- Each vehicle can carry a large quantity of shredded paper.
- All CSRs carry out security checks on their vehicles before leaving the facility and on their return daily; this is to ensure the vehicle is in full operational order, fit for purpose, and meets Shred-It's required quality and security standard.
- All Shred-it vehicles follow maintenance schedules, and an annual service plan.
- All vehicles are GPS tracked (according to applicable laws), which provides an additional layer of security by allowing Shred-it to know where the customer's confidential materials are at all points of the process.

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 - are comprised with the following features:**
 - Capacities of 65 and 96 gallons
 - Manoeuvrability - 12" Non-marking rubber wheel
 - 3" Locking caster wheels
 - 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 goods and services. Among these are risk assessments on the use of all shredders, manual handling procedures, and the operation of Shred-it vehicles.
- **Certificate of Destruction**
 - As part our ongoing duty of care to our customers, Shred-it will provide a Certificate of Destruction as part of the Service Certificate to the customer after each service has taken place. 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 customer's confidential materials by applying the applicable laws and regulations.
 - The Certificate of Destruction is provided free of charge as part of the Shred-it service. The content on the Certificate of Destruction 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; or the facility's NAID Certifications and Endorsements.

- **Staff Vetting**
 - All Shred-it employees are screened prior to employment, to ensure their eligibility to perform their job responsibilities.
 - Upon commencement of employment and on an ongoing basis, all employees are required to read, sign, and abide by Shred-it's Confidentiality Agreement, ensuring all employees are aware of their obligations and duties.
- **Shred-it Training**
 - Each job within Shred-it has been assessed for specific training requirements to ensure that a high level of competency is achieved throughout the work force. Where training is required, Shred-it arranges and assesses competence of the individual prior to allowing them to conduct critical operations. Staff that carries out shredding services are trained with respect to appropriate data protection practices and handling of personal data.
 - All Shred-it 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.
 - 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**
 - There is an internal procedure for employees to follow regarding security incidents to ensure the timely reporting and handling of identified incidents.

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**
 - 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**
 - We are always striving to improve our services, and to this end, we have the following accreditations and memberships to industry associations in order to keep up to date with current legislation and best practices:

North America and Australia:

- **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:

- **ISO 9001:2008** - 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.
- **ISO 14001:2004** - 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.
- **BS EN 15713** - This Code of Practice outlines the key requirements of a professional information destruction company and the importance of security. Shred-it is assessed against these requirements as part of their ISO 9001 external audit and it is listed on their ISO 9001 certificate.
- **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.

- **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.
- **Fleet Operator Recognition Scheme (FORS) Bronze accreditation** - Confirms Shred-it employs good practices and complies with the requirements laid out by the FORS Standard. This includes dedication to driver and vehicle safety, combined with improving operating practices through effective monitoring of fuel and tire usage.
- **Waste Carriers License Number Reference:** CBDU51993 (England and Wales), WCR/R/1137691 (Scotland) and ROC UT 681 9 (Northern Ireland).

Germany:

- **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).