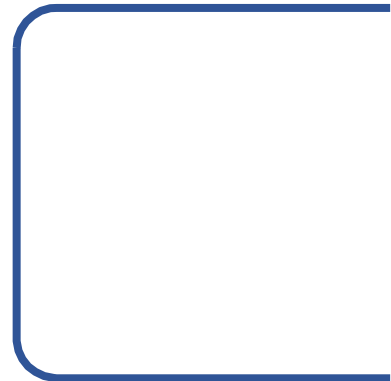




>Disposing of Personal Data<



Storing and Disposing of Personal Data

Correct at: 23 July 2018



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I. General

According to the General Data Protection Regulation (GDPR), which has been in force since 25 May 2018, a precisely documented process and its handling of disposal of personal data must be introduced throughout entire TU Wien.

The disposal process begins with the proper storage of the data and ends with the actual and professional disposal by the disposal contractor. In addition, full accompanying documentation must be prepared and maintained.

A regular routine inspection is to be introduced and maintained as an accompanying measure.

II. Process description

Documents (documents, stored folders, other paper printouts) containing personal data may not be routinely stored and disposed of but must be stored and destroyed in a predefined system. It is the responsibility of the originator (institute or department) to ensure that personal documents enter this predefined system.

Where institutes or departments are unsure of how to proceed, the respective data protection coordinators or data protection contact persons must be contacted.

The Department of Buildings and Engineering (TU GUT) provides the predefined system and the resulting services and also assumes all costs incurred in this context.

The storage and disposal process is divided into three stages:

Stage 1: On-site storage

Stage 2: Collection and intermediate storage

Stage 3: Disposal

Stage 1: On-site storage (normal operations)

Actual on-site custody in the institutions and departments must be at designated custodian locations or in specific custody systems. According to the Data Protection Act, a normal box or cabinet in a publicly accessible room is not an ideal solution. The Department of Buildings and Engineering (TU GUT) therefore provides different storage systems depending on requirements.

There are two different storage systems:

Type 1: Built-in cabinets (safes)

Type 2: Box and cupboard

Type 1: Built-in cabinets

690 x 450 x 400 mm

steel

capacity: approx. 4 A4 ring binders

Safes with keys are preferable for security reasons



Figure 1 – symbolic photo of a safe

Type 2: Box and cupboard

1950 x 990 x 500 mm

steel

610 l volume

fire-proofed

146 kg unladen weight



Figure 2 - symbolic photo of a cupboard



Phase 2: Collection and intermediate storage

Two different alternatives are available for the collection:

Alternative 1: On-site collection with data-protection containers

Alternative 2: Direct collection of large quantities from the storage location (archives)

Alternative 3: Direct removal using an on-site shredder

Alternative 1:

Individual documents, papers etc. must be disposed of in the institute or department directly using a special waste container (with slotted flap). The waste container will be provided by the Department of Buildings and Engineering (TU GUT). The site of the container will be determined together with the institute or the department. Contact persons for TU GUT will be the respective data protection contact persons or data protection coordinators in the institutes, departments or faculties. If no data protection contact persons have been appointed, the relevant data protection coordinator will be contacted.

If available, the archive rooms in each institute and department will be made available for the installation of the containers. If no archive rooms are available, a suitable storage location must be determined.

The locations of the waste containers for disposal purposes in the institutes must be checked for their suitability with regard to security standards (e.g. lockable room, access controls, general security situation) by the Department of Buildings and Engineering together with the respective data protection contact person or the relevant data protection coordinator.

If deficiencies are found, they will be resolved by TU GUT together with either the data protection contact person in each institute or department or with the data protection coordinator in the faculty or department. If there are no defects, the locations for the containers will be approved and the location documented.

Sample waste containers (shredders):



Figure 3 – symbolic photo of a waste container (shredder)

This type of solution would be preferable as it is practicable, easy to integrate, safe and optically attractive.



Alternative 2:

Disposal of entire archives, cabinets, etc. must be ordered directly. The bags are made available to the institute or the department. The procedure is as follows:

TU GUT receives a ticket with the order "Disposal of large quantity of paper". GUT compares the quantity with the respective institute or department and directly requests the disposal company to provide one or more suitable disposal containers. These are delivered to the site directly. The containers can be locked and the key is handed over to a previously-nominated contact person at the institute or department. After the institute or department has finished filling the container, GUT receives a request to have the container collected. Both the collector and a GUT employee are present at collection. An authorised person from the institute or department must also be present to receive the disposal certificate. The containers are then handed over to the disposal company for proper disposal. GUT then receives a certificate which is immediately forwarded to the institute or department.

Note: Please observe the archiving guideline¹. If you are not sure whether data may be destroyed, please contact the data protection and document management department or the archive.

¹ Note: a new version is currently in preparation.

Alternative 3:

Shredders are purchased by TU GUT. The institute or the department itself can shred the documents that occur. The shredded waste is then disposed of via the paper fraction.

Example:

430 x 312 x 448 mm

construction: plastic/steel

weight: 15 kg when empty

collection capacity: 26 l

shredding capacity: 6 sheets

Note: Please remember that shredding is not an ideal option as

- (a) repair and maintenance costs must be taken account of and
- (b) it drastically increases the volume of waste.



Figure 4 – symbolic photo of a shredder



Phase 3: Disposal

In Alternative 1:

Trained employees of the Department of Buildings and Engineering collect the waste.

The full bag in the containers is closed, sealed and documented on site in the presence of an employee of the institute or the department. The waste disposal certificate is filled in and signed by both parties (institute/department and GUT).

A copy is sent to the respective contact person.

The sealed bags are then taken to the central warehouse. These are located in Freihaus, Gusshaus, Getreidemarkt and Arsenal and are in the care and responsibility of TU GUT. The warehouses are specially secured and have restricted access.

The documents are then collected at regular intervals by a disposal company which disposes of them professionally. Collection involves handover certificates and confirmations. A certificate is sent by the disposal company to TU GUT. The latter immediately sends the certificate directly to the respective contact person at the institute or department.

If the waste involves larger quantities, GUT must be contacted directly, after which the quantity and period of disposal are recorded. The bags are provided by GUT.

In Alternative 2:

This is to be seen as a special collection and is described in Alternative 2 directly.

In Alternative 3:

This alternative requires no special collection.