



PREVENTION AT SEA

CIRCULAR 05/2018

GDPR & E-WASTE
(GARBAGE MANAGEMENT PLAN)
**TACKLE THE SECURITY INCIDENT
BEFORE IT HAPPENS!**

**Don't Cure,
PREVENT**

GDPR & E-Waste (Garbage Management Plan) – Tackle the security incident before it happens!

Case Study: In light of the *EU General Data Protection Regulation (GDPR)* that enters into force on **25th of May 2018**, Prevention at Sea suggests to pay attention to the management of *E-waste onboard*.

What is GDPR:



A legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU). The GDPR sets out the principles for data management and the rights of the individual, while also imposing fines that can be revenue-based. The GDPR covers all companies that deal with data of EU citizens. GDPR enters into force across the EU on May 25, 2018.

What is E – Waste:



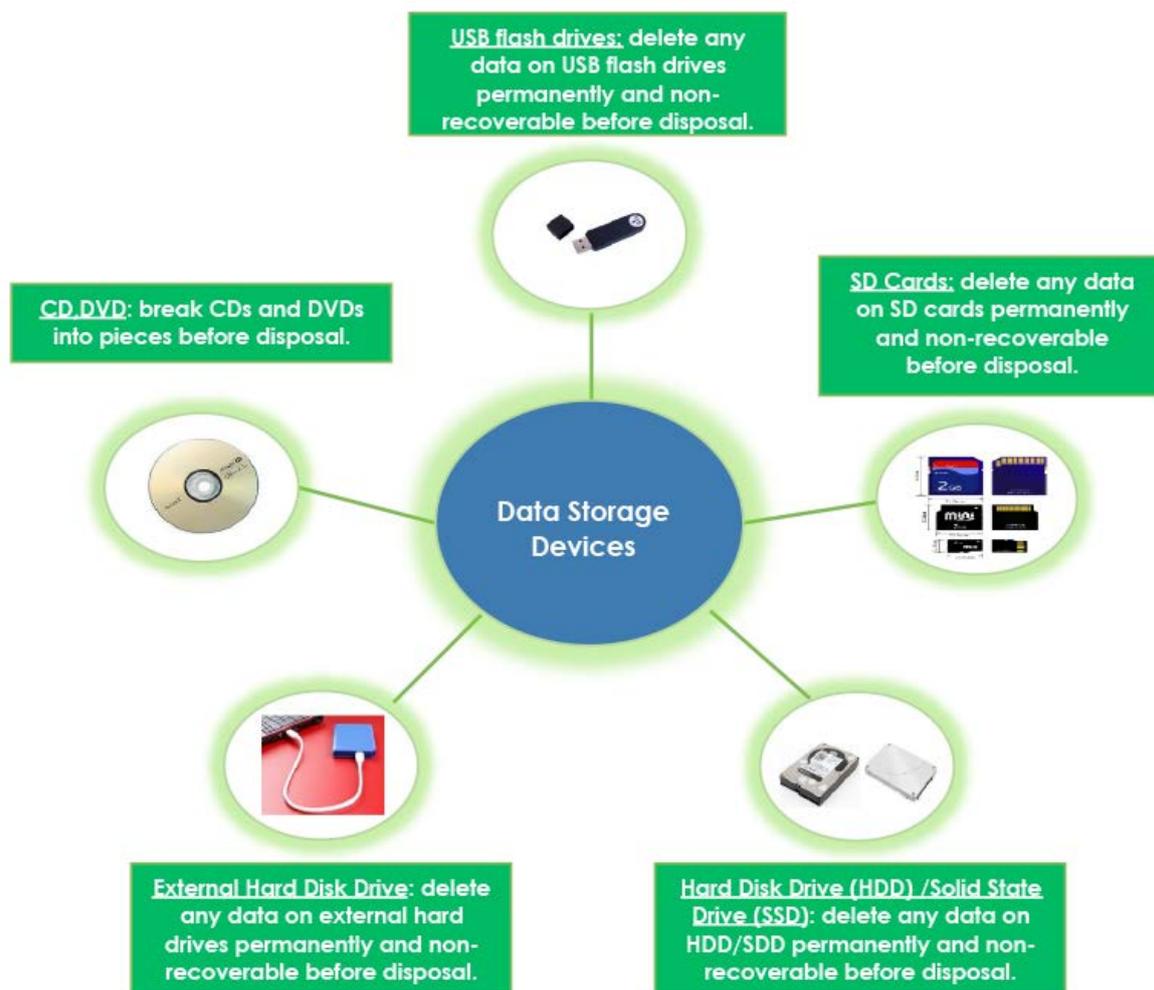
The amendments to MARPOL Annex V adopted at MEPC 70, entered into force on 1st of March 2018. Amongst others, the changes include a new Garbage Record Book format with a waste category added for e-waste. E-waste includes any electrical and electronic equipment used for the normal operation of the ship or in the accommodation spaces, including all components, sub-assemblies and consumables which are part of the equipment at the time of discarding, with the presence of material potentially hazardous to human health and/or the environment (MARPOL Annex V § 2.4.3 – MEPC. 239 (65)).

How can E-waste contain Personal Data?

E-waste generated onboard possibly contains personal and sensitive data, for instance crew personal information (e.g. passport details, crew certificates etc.) or ship security sensitive data. Unauthorized persons gaining access to and misuse such data may cause significant damage, including access to ship electronic control units, threatening its operation.

On board personnel should give special attention to the management of e-waste, ensuring that any data potentially saved on electronic devices will be completely deleted before disposal.

Personal Data from data storage devices MUST be unrecoverable before disposal. Good practice is to ensure that e-waste is free from any personal or sensitive data!



Onboard e-waste that can contain personal or sensitive data

Before disposing a PC, laptop or notebook, ensure that any build-in data storage devices or attached external data storages are removed or the data contained herein permanently deleted.

To ensure both prevention of breaches of security and compliance with the EU GDPR, Prevention at Sea suggests to consider the below steps for the management of e-waste:

- ✓ Before disposal, inspect e-waste carefully to identify all data storage devices and ensure that any personal and sensitive data is permanently deleted
- ✓ Consider physically destroying data storage device for instance by a shredding machine instead of disposing ashore intact.
- ✓ There is several free software on the market that can erase data from the data storage devices ensuring that sensitive information or personal data cannot be restored. Before installing such software ensure compliance with the Company's Cyber Security Policy.
- ✓ Consider using services by waste clearance companies for the management of wastes that can permanently erase data on storage devices and certify permanent disposal of the data.
- ✓ Take also care about devices that use dye film or ink ribbons, such as some printers and fax machines. Data that was printed with such machines can easily be read on films and ribbons, and therefore also films and ribbons must be carefully destroyed and disposed.
- ✓ At all times ensure processing of e-waste in accordance with the Company's Cyber Security Policy
- ✓ Add information about and best practices for the management of e-waste to the ship's Garbage Management Plan.



Protect your data – Protect your vessel!

To assist our Clients, the Garbage Management Plan prepared by Prevention at Sea, contains a separate Appendix, where clear reference is made to the management and processing of E-waste, always in compliance with the Company's procedures.

For more information on PaSea Garbage Management Plan and its contents, please contact us!



Send data storage devices that are about to become waste to the Company's office for efficient and effective control of contents prior to secure disposal.



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DON'T CURE, PREVENT! FOR MORE INFORMATION,
PLEASE DO NOT HESITATE TO CONTACT US.



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