Data Erasure Policy - Solutions de Repérage Emili Inc. Version 1.4

Revision Date: 2023-11-30

Preamble

At Solutions de Repérage Emili Inc. ("Emili"), we place great importance on protecting sensitive electronic information. Acknowledging the constant evolution of technology and legislation, including Canadian Law C-23, Quebec's Law 25, and the Personal Data Protection Law, we have updated our data erasure policy.

Objectives

This Policy establishes mandatory standards for protecting the company's information and information systems, in compliance with applicable laws and regulatory requirements. The aim is to protect all of Emili's informational assets and prevent unwanted, accidental or intentional data erasures.

Scope and Application

This Policy applies to all informational assets held by Emili, its subsidiaries, and associated companies. It should be consulted alongside our Data Security Policy, Personal Information and Security Policy, and Information Privacy Policy.

Roles and Responsibilities

- The CEO of Emili approves this Policy and supports the implementation of protective measures.
- The Information Security Officer (ISO) is tasked with managing and operating information security and providing guidance on the implementation of this policy.

Data Erasure Methods

- Hard Drives: Emili uses reputable data recovery software for recovering data from damaged hard drives and erasure software for the secure destruction of hard drives at the end of their lifecycle.
- SSD Drives: Emili employs specialized methods for the secure erasure of SSDs, excluding traditional erasure methods.
- Smartphones: Emili prefers a factory reset for smartphones without sensitive data and uses professional data erasure software for devices containing sensitive data.

Information Categorization

Emili categorizes data based on its level of confidentiality and adheres to NIST 800-88 guidelines for the erasure of electronic storage media.

Erasure Categories Employed by Emili

Emili applies logical erasure techniques, purging, and destruction methods based on the type of storage media and the confidentiality level of the data.

Erasure Verification

Procedures for verifying each erasure are implemented, including sample verification, to ensure the effectiveness of the erasure methods.

Revision

The Policy is reviewed annually to ensure its relevance in line with legislative, contractual, and technological developments.