

2021 | Issue 3

The Quarterly Journal of the International Secure  
Information Governance & Management Association

iG

JOURNAL™



*Getting Ahead of Parts  
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It's All in the Planning

Harmonizing Privacy Regulations

Embracing Certification's New Relevance

How to Overcome the Labor Dilemma



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## FROM THE EDITOR

**Kelly Martinez**  
i-SIGMA Director of Marketing & Communications

### *Be Prepared!*

*What do you think of when you hear these words?*

*For me, the first thing that comes to mind is that it is the Boy Scout motto. As a Girl Scout myself and having children who were both in scouting programs, I smile at how this concept has trickled into even the little areas of our lives. For example, we live in the infamous heat of Arizona; however, many don't realize that to compensate, often the air conditioning in venues is always on blast. As such, our family tends to bring a sweater (or hoodie for the teenagers) everywhere we go.*

*The song from the Lion King also ominously thunders through my mind. Scar, the antagonist of the story, sings Be Prepared to his army of hyenas as he shares his Mephistophelean plot to usurp power. It reminds me that good planning is important not only to achieve goals, but also in risk mitigation and to retain the good things a business has already achieved.*

*This quarter's iG Journal also had the motto on repeat in my mind as I read through the various articles. The featured story is Getting Ahead of Parts Delays & Shortages. All seven of the article contributors couldn't stress enough the need to be prepared. Learn about the situation and what you can do on page 28. Similarly, preparedness will help companies overcome the labor dilemma in this evolving economy; find out how to obtain resources on page 26. And as changes in regulations (page 14) and in tandem within the association (page 20) further emphasize and clarify the value of the i-SIGMA Certifications, preparing your company to be part of the rise is critical to remain optimal in business growth. And finally, for the health of the market, i-SIGMA is modifying its membership and branding for members. See what changes your company may need to implement by the end of the year on page 9.*

*There is nothing wrong with rolling with the punches. But being prepared makes it a lot easier. Especially, when you have a business to maintain and profits to grow. i-SIGMA is happy to help in supplying preparedness resources now and always.*

# MORE REVENUE

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March 29, 2021*

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*Keep up-to-date on Community News in the association's member-only Facebook Group, i-SIGMA Social, and by following i-SIGMA on LinkedIn.*

Earlier this month the i-SIGMA Board of Directors met in Spokane, WA, USA for the Annual BOD Face-to-Face meeting. Some of the board members (pictured) had some fun on electric scooters after the meeting. During the meeting they discussed current membership topics and ways to continue to grow the association in the coming year.



Here at i-SIGMA, we are feeling the excitement of the upcoming 2022 Annual Conference in Orlando, FL, USA. Save the date for April 10-13, 2022. Amongst the excitement, we found this great photo from the 2017 Annual Conference Truck Lot Party in Las Vegas, NV, USA.



**In Memoriam: Andrew Sokol, CSDS**

It is with great sadness that the association announces the recent passing of Andrew Sokol, CSDS. As a successful entrepreneur, a fixture at association events, and a regular contributor to industry initiatives, Andy became well known over the past several decades for his intelligence, his generosity, and his infectious positive attitude. As one of Andy's colleagues put it, "You never saw him without a smile on his face, and he was always ready to help when asked." Tributes celebrating Andy's life and his impact on those who knew him, can be found on i-SIGMA Social on Facebook. His memorial can be found by visiting <https://www.stanfillfh.com/tributes/Andrew-Sokol>

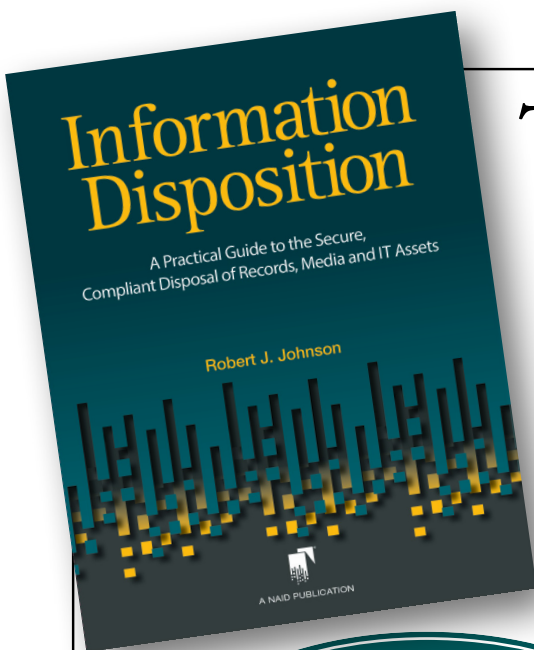


**In Memoriam: Terry Lee**

It is with our deepest sorrow that we inform you of the passing of Terry Lee last week. Terry was a business leader and experienced sales, marketing, and operations management executive, but he will be most remembered for his kind and mild disposition. Our condolences to all who knew him, especially his family and Trans Lease colleagues. Tributes celebrating Terry's life and his impact on those who knew him, as well as services, can be found on i-SIGMA Social on Facebook.



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# PRESIDENT'S MESSAGE

With the American football season underway, I have enjoyed watching my sons compete. Regrettably, our 10-year-old son had an early, season-ending arm injury. Watching my 12-year-old son play football has been a joy, as he does his personal best at becoming a football player.

This past week we watched in agony as “our team” was beaten by “the Tigers”, by what seemed like 1,000 points. Not only was the scoreboard painful to look at, but the violence of the game was horrific. According to some parents, there were 11 injuries incurred by “our” losing team, one of them somewhat severe.

My son experienced firsthand what I am calling; “**crushing competition**”.

The Tigers, who sent us home in tears (figuratively and literally), had some critical and unique features.

1. Each player-athlete of the Tigers had been **specifically recruited**. The Tigers are not just a convenient assembly of the local, “hometown”, youth athletes. They are a private club. The Tigers recruit the oldest allowable ages for the league, from anywhere in the region. They are genetically, physically, “bigger” humans, relative to other boys of their ages. Combining these athletic “resumes” makes for the right “stuff” to win football games.
2. The Tigers are **exceptionally trained and coached**. Exceptional coaches bring out the best from players, unify the complete team, and can take each and every player to their next levels. These players were already good... from their coaching, they became greater.
3. The Tiger athletes are internally, 100% convinced, that they are each going to be professional athletes, creating **an attitude** of total confidence. This sort of winning attitude, passion, and natural intensity was shining so brightly that players and spectators alike were being blinded.
4. The Tigers had game **strategy**. In my 12-year-old son’s naivety, after the game he criticized that many of the Tiger’s players were wearing armbands with play queues (not something their team does). I helped him understand that this was not weakness, or cheating, rather an enabling of greatness and power. Each player knew his role to play and had the tools to execute the strategies.

As an athlete and former coach, the game was incredible to watch. As a father, the game was bitter-sweet to watch. Viewed through the lens of business, seeing a demonstration of “crushing competition” was inspiring.

I invite you to become a force of “crushing competition”. Become something that can’t be given to you. The government can’t give that to you. You can’t buy it. You have to work at it and become it through experience. Recruit for it. Train and coach for it. Have the attitude required for it. Execute the needed strategy for it.

“Crushing competition” is something to love.... something I love.

**Brock Miller, CSDS**

i-SIGMA President

**IMPORTANT**

## NAID & PRISM International are Evolving: What Every Member Needs to Know About Membership & Logo Changes

To remove market confusion between membership and certification, members approved a bylaws change limiting the use of NAID and PRISM International to the association's certification programs.



As a result, over the coming months members will transition to referring to themselves as "i-SIGMA Members." Only where members have completed the necessary certification audits may they refer to themselves as being NAID AAA Certified and/or PRISM Privacy+ Certified.

The pre-existing i-SIGMA bylaws create a divisional structure that divided member-companies into two constituencies; data destruction (NAID) and records management (PRISM International). This resulted in separate dues structures, with some member-companies paying dues twice, and under represents the addition of service providers who do not clearly fall into one or the other. Additionally, maintaining this divisional structure adds bureaucratic red tape that creates unnecessary expense. Removal of the divisional structure will not affect the continuing availability of NAID AAA Certification or PRISM Privacy+

Certification, and, in fact, will allow all i-SIGMA members to access those programs.

With the dissolution of the divisions, the membership structure is changing along with how members will be able to represent themselves. All members will now be identified as i-SIGMA members. The NAID and PRISM International designations will be limited to the i-SIGMA Certification Programs, retaining the strength of those brands, without diluting the names with marketing confusion over companies which are or are not certified. This will create greater clarity in the marketplace and allow all members to still receive the full benefits and backing of their trade association.

"At the end of the day," i-SIGMA CEO Bob Johnson said, "it means the "NAID Member" and "PRISM International Member" status and logos are going away. They will no longer be confused as inferring any form of certification. Certified firms may continue to represent themselves as being NAID AAA Certified and/or PRISM Privacy+ Certified; however, those service providers choosing not to be certified will be limited to the use of the i-SIGMA Member logo."

i-SIGMA wanted to be sure to give members ample time to make updates as needed throughout the rest of 2021, so that all members and the association can start 2022 re-aligned together.

**Here are answers to some of the most Frequently Asked Questions (FAQs) related to the most recent**

### **i-SIGMA® bylaws change.**

All Members have through the end of the year to make updates based upon their membership. As of 1 January 2022, Members may no longer use historic membership logos in their materials (e.g., website, business cards, brochures, etc.).

## Board Approves New Name & Logo for Vendor Members

When the i-SIGMA Board of Directors met in February of this year for a strategic planning meeting, the importance of



best supporting all members, including Associate/Vendor Members was among the topics discussed. From that conversation the Vendor Engagement Committee (VEC) was formed, and a recommendation was made to determine if "Vendor Member", as passed under this year's bylaws change, was the ideal nomenclature for this membership group.

In their first order of business, the VEC conducted a poll of Vendor Members, seeking your input on a membership name that would be best, both for Vendor Members and Service Provider Member. The resounding winner in this survey was "Corporate Partner." As such, the Board of Directors approved this in a bylaws change, which will be on the Spring ballot for member ratification.

Without further delay, the association will begin referring to this member group, who offers Service Provider Members products and services to help their

businesses, as Corporate Partners. There is also a new logo to represent their membership with the association, and the Vendor Engagement Committee has been appropriately renamed, the Corporate Partner Engagement Committee.

Corporate Partners may contact i-SIGMA Staff to obtain the new i-SIGMA Corporate Partner logo files at [communications@isigmaonline.org](mailto:communications@isigmaonline.org). All Members have through the end of the year to make updates based upon their membership. As of 1 January 2022, Members may no longer use historic membership logos in their materials (e.g., website, business cards, brochures, etc.).

## Margaret Meier, CSDS Appointed to i-SIGMA Board

Margaret Meier, CSDS of Ultrashred Technologies, Inc. (Jacksonville, FL, USA) has been appointed to fill a vacancy on the i-SIGMA Board of Directors, filling a sudden vacancy, marking the second time she has served in that role.



**Margaret Meier, CSDS**

The vacancy which Meier was called on to fill was created by the resignation of Michael Payton, CSDS, who accepted a position with ACCESS, which was already represented on the Board by Director Jordan Peace. The bylaws do not allow for more than one Director from any member-company. Payton will continue to serve as the Chair of the CSDS Board of Regents and as Chair of the PRISM Privacy+ Committee.

i-SIGMA President Brock Miller, CSDS of Shred Northwest (Portland, OR, USA) cited Meier's long history of contributions to the industry as his reason for the appointment. "Margaret's leadership of the Certification Support Committee has helped create i-SIGMA's most successful program. Between that leadership and her prior service on the board, it was an easy decision."

## Industry Veteran Appointed to the Complaint Resolution Council

The i-SIGMA Board of Directors has approved the appointment of Barry Payne (pictured) of ACCESS (Woburn, MA, USA) to serve as a member of the Complaint Resolution Council (CRC), which is the council responsible for investigating violations of the associations Code of Ethics.



**Barry Payne**

Regarding Payne's qualifications, the current CRC Chair, Bowman Richards, CSDS of Richards & Richards, LLC (Nashville, TN, USA) said, "Barry's decades of experience in the RIM and secure destruction industries will be invaluable to the council. We're all lucky he is willing to give back. He's seen it all."

"The i-SIGMA process of actively enforcing its Code of Ethics is unique among trade organizations," said i-SIGMA CEO Bob Johnson. "Through our mantra, 'see something, say something,' we encourage members to help us police the industry. We could not do that without people like Barry willing to serve in what is often a thankless job."

The entire list of CRC members is available on the association's website, along with the Complaint Resolution Guidelines and Ethics Complaint Submission Form.

## Rod Ivey to Chair Ethics Enforcement Council

The i-SIGMA Board of Directors has approved the appointment of Rod Ivey of BEST Shredding (Coquitlam, BC, CA) to serve as chair of the Complaint Resolution Council (CRC). The



appointment was made necessary due to the fact that the previous CRC Chair Bowman Richards, CSDS of Richards & Richards (Nashville, TN, USA) is currently serving as i-SIGMA's President-elect, meaning he will automatically assume the Presidency in April.

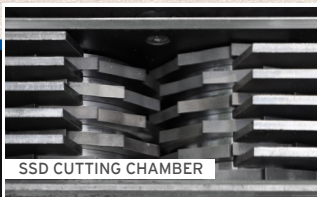
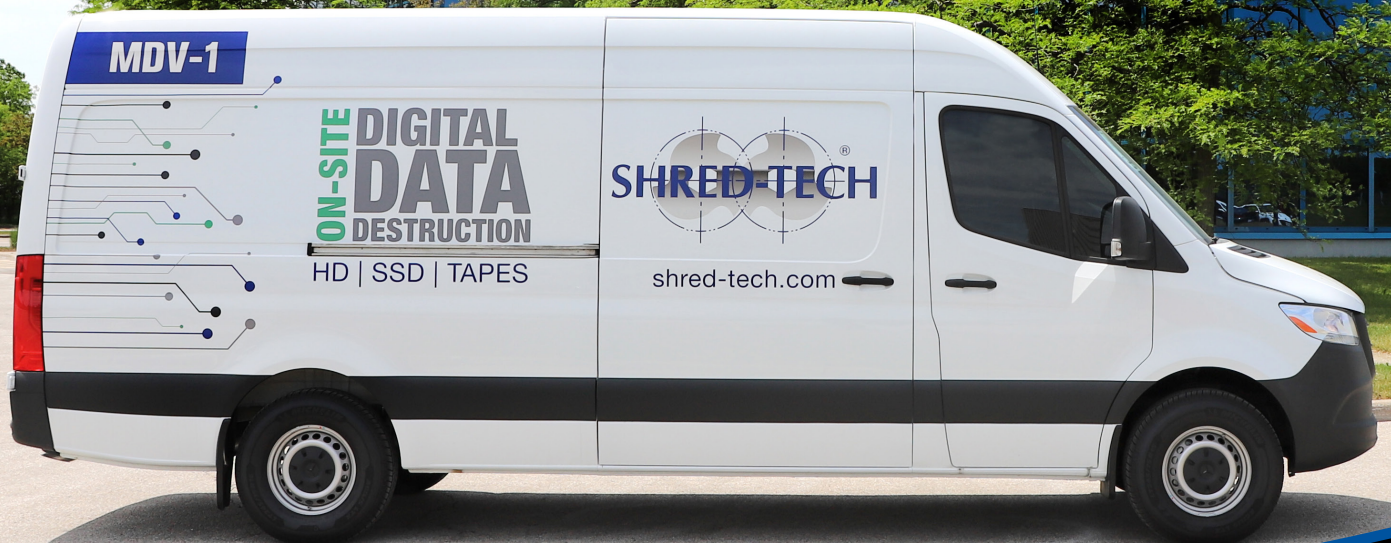
For those unfamiliar with the CRC, it is the association responsible to investigate all reported violations of the i-SIGMA Code of Ethics, making recommendations to the Board of Directors on any subsequent remediation and sanctions.

# MDV-1

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The Certification Review Board and the Certification Rules Committee oversee the program's integrity, both of which contain industry veterans and outside, accredited professionals.

## Transparency

All documents and specifications are available to the public for free and online. Audit reports and monitoring services are also provided to clients at no charge. The association's financial records and board of director's meeting minutes are available online as well.

## Program Acceptance

More than 1,000 operations on five continents are NAID certified, including mobile, plant-based, paper, and computer destruction services. NAID certification is required by hundreds of government offices and thousands of private contracts.

## Program Recognition

NAID certification is acknowledged by many accreditation programs, such as those offered by the International Association of IT Asset Managers, the Institute of Certified Records Managers, and the R2 IT asset recycling program certification offered by the Sustainable Electronic Recycling Institute (SERI).

*For more information, contact the NAID Certification Department at [certification@naidonline.org](mailto:certification@naidonline.org) or 602-788-6243. Additionally, Bob Johnson, NAID's founder and CEO who is widely acknowledged as the leading authority on data destruction operations and regulations, can help members explain the value of their certification to clients.*

Rod's chairmanship of the CRC follows his participation as a member for the past year.

In commenting on the role of the CRC and his appointment of Rod Ivey as its Chair, current i-SIGMA President Brock Miller, CSDS of Shred Northwest (Portland, OR, USA) said, "Ethics enforcement is one of the most important functions of the association and we are lucky to have someone of Rod's integrity and dedication to continue its long history of protecting the industry."

## 2022 Nominating Committee Formed

In preparation for next year's elections, the i-SIGMA Board of Directors has approved the members of the 2022 i-SIGMA Nominating Committee.

In commenting on the approval, 2022 Nominating Committee Chair (and Past President) Patrick DeVries, CSDS of DeVries Business Services (Spokane, WA, USA) said, "Many members don't realize how early the board elections process starts. By the time we spend a couple months reviewing and getting board approval of the election guideline, then opening the nominating period, and conducting the election itself, it can take seven or eight months. It's why the bylaws require the Nominating Committee be formed as soon as possible."

The member representatives approved by the Board to serve on the 2022 Nominating Committee are:

- Don Adriaansen, CSDS of TITAN Mobile Shredding (Plumsteadville, PA, USA)
- Keith Erickson, CSDS of Reed Records Management (Wooster, OH, USA)

- Tom Fetters of Iron Mountain (Boston, MA, USA)
- Angie Singer Keating, CISA, CISM, CRISC of Reclamere, Inc. (Tyrone, PA, USA)
- Margaret Meier, CSDS of Ultrashred Technologies, Inc. (Jacksonville, FL, USA)
- Richard Steed of Pacific Records Management (Stockton, CA, USA)

As Past President, Pat DeVries automatically serves as the 2022 Nominating Committee Chair.

## i-SIGMA Comments on Proposed Canadian Provincial Privacy Regulations

Perhaps in anticipation of the death of the federal Bill C-11 introducing GDPR-based amendments to Canada's Personal Information Protection and Electronic Document Act (PIPEDA), policy makers in the provinces of Alberta and British Columbia are recommending reforms to their respective Personal Information Protection Acts (PIPA). And, while the outlook for the aforementioned Bill C-11 is not promising, both BC and Alberta have proven time and again they will act, either in concert with the federal government, or in spite of it.

With this in mind, the association has been paying keen attention to these provincial initiatives, going so far as to file official comments on each.

According to i-SIGMA's CEO Bob Johnson, there is good reason to be hopeful.



"Any ratcheting of privacy and data protection requirements is good for reputable service providers," said Johnson. "And the fact the EU's General Data Protection Regulation is pressuring global jurisdictions to raise their game should be celebrated."

Given these comments, it is no surprise that front and center among i-SIGMA's comments is that global harmonization with the GDPR is critical to compliance and personal information protection rights. More specifically, the association encourages both provinces to adopt GDPR measures that recognize credible, reputable industry certifications built to verify data processor compliance.

[Read the i-SIGMA comment on BC's proposed PIPA amendment.](#)

[Read the i-SIGMA comment on Alberta's proposed PIPA amendment.](#)

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# Harmonizing Privacy Regulations in the United States

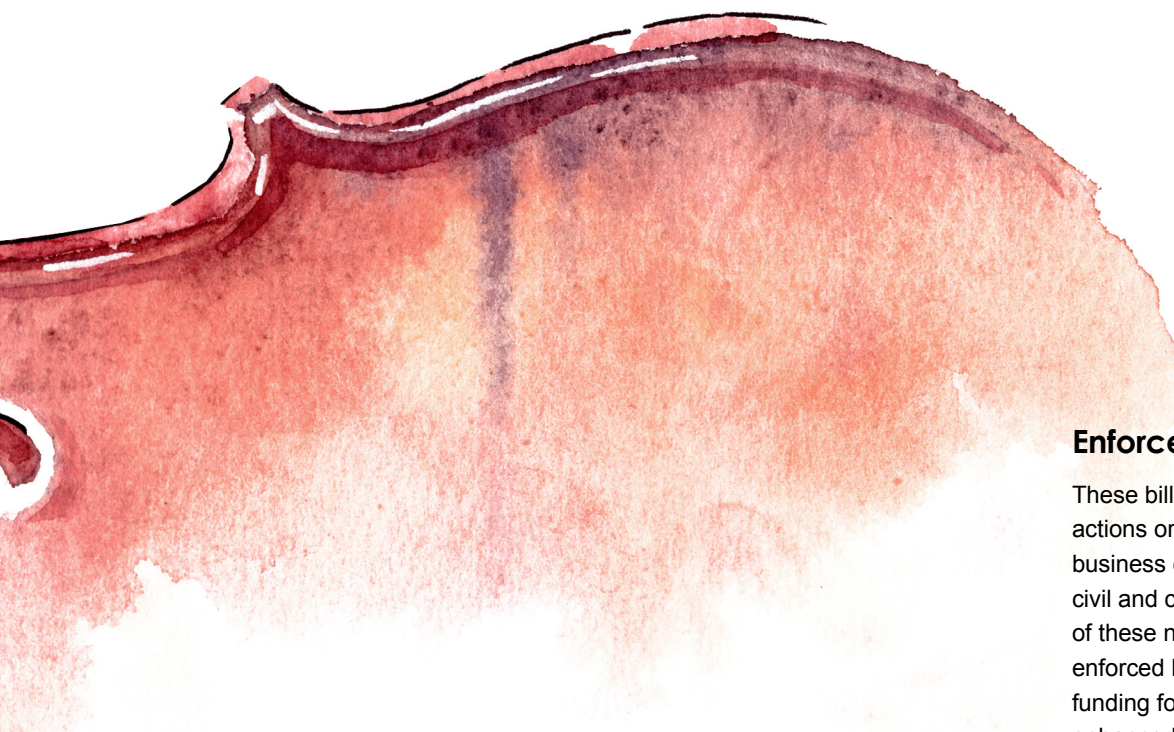
By: Kim Boyle CIPM, CIPP/ US and  
Ross Federgreen FIP, CIPM, CIPP/ US, G, E, C

Throughout 2021, congressional lawmakers have introduced multiple Bills focused on data privacy. This is an annual congressional exercise going back at least 15 years where it has been recognized that an overarching set of common regulations and standards are needed for compliance and clarity.

The underlying reason for this is to harmonize and align U.S. Privacy regulations so that compliance is doable. In the current situation, each of the 50 states have their own regulations as well as there being nearly two dozen various Federal regulations.

It is important to understand that each of these regulations place great emphasis on the requirement for an independent Data Privacy Officer (DPO). Although the business entity may have an in-house DPO, it is the clear intent of these pending regulations to make this function independent.





We review four current proposals looking at their common elements as guidance for the future.

- The Consumer Data Privacy and Security Act (S.1494 – Moran)
- The Consumer Online Privacy Rights Act (S.2968 – Cantwell/Schatz)
- The Setting American Framework to Ensure Data Access, Transparency and Accountability Act (SAFEDATA) (S.2499 – Wicker/Blackburn)
- The Information Transparency & Personal Data Control Act (ITPDCA) (HR1816 – DelBene)

Three common elements identified are Business Obligations, Individual Rights, and Enforcement.

## Business Obligations

Although there are some slight differences between the proposed federal privacy laws, *Business Obligations* consist of the bulk of the requirements. These requirements or obligations include *privacy policy notice* concerning collection, processing, and transferring of personal information, *affirmative express consent* of consumers for the processing and transferring of their data, data security practices, designation of a data protection officer, and overseeing of service providers who process data on behalf of controlling businesses.

## Individual Rights

Individual rights are central to the proposed bills. Three common elements are as follows: first, right to access, correct, delete, or transport personal information; second, the right to opt-in for sensitive data processing by obtaining consent; third, the right to opt-out of specific data processing.

## Enforcement

These bills all broaden the types of actions or inactions on the part of the business entity which can lead to both civil and criminal penalties. Enforcement of these new or augmented penalties are enforced by the provision of enhanced funding for increased investigators, enhanced publicity of the regulations, and interdepartmental and or inter agency sharing of potential violations and violators.

For example, in these various measures there is enforcement augmentation by the Federal Trade Commission (FTC), State Attorney Generals, and most concerning in some instances the right to Private Action. Not only are damages assessed for actual damages, but punitive damages can be obtained as well. Major determinants of these penalty actions are the amount of injury that occurred and the degree of preparedness on the part of the business entity.

Businesses must comply with the following should any of the mentioned Privacy Acts pass. These include:

- 1) Provide a *privacy policy/notice concerning the collection, processing, and transferring activities of your consumer's personal information.*



- Recipients of transferred data and their purpose(s) for receiving the data.
- Description of the business' data retention practices and the purpose for the retention.
- How individuals can exercise their rights (such rights are stated above under the category of Individual Rights).

2) *Affirmative Express Consent.*

This is defined in S.2499 as, “upon being presented with a clear and conspicuous description of an act or practice for which consent is sought, an affirmative act by the individual clearly communicating the individual’s authorization for the act or practice”. In this Bill, express affirmative consent must be given by individuals prior to allowing businesses to process and transfer their “sensitive” data. For example, this is achieved by the business giving the individual a clear description of the processing of their sensitive data, as well as the purpose necessary to fulfill the individual’s request, using a prominent heading enabling the individual to easily identify the processing purpose and explaining their rights to provide or withhold their consent.

Affirmative Express Consent cannot be inferred for a processing purpose simply by an individual’s lack of action to give consent. Businesses MUST also provide individuals with a clear means of withdrawing their affirmative express consent once it is given.

3) *Data Security.* Businesses must establish, implement, and maintain reasonable data security practices to protect the confidentiality, integrity, and accessibility (also referred to as CIA) of the data

that they handle. For example, the necessary implementation of the appropriate security measures would be dependent on the size of the business and the amount and nature of data that they handle. Such practices need to include:

- Assessing vulnerabilities of any foreseeable risks in each system maintained by each business for the processing or transferring of data. This involves protecting data from unauthorized access, human error, access rights of employees, and your use of service providers.
- Taking preventative and corrective action to mitigate such risks and vulnerabilities found, such as changes to current security practices or implementing network or operating software.
- Disposal of data when it is no longer necessary for the stated purposes in which it was originally collected unless affirmative express consent is received otherwise. Examples of disposal of data include destroying, permanently erasing, or otherwise modifying to make the data unreadable, indecipherable, and unrecoverable.
- Training all employees with access to company data on the importance and processes of safeguarding data and protecting individual privacy.

A Privacy Notice needs to be made available to those visiting each business’ website in a clear and conspicuous manner. The notice must identify:

- Contact information of the business, as well as the identity of any affiliate to which the business transfers an individual’s data.
- Categories of data and the processing purpose for each category.



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- Maintaining reasonable procedures requiring third parties and service providers to which your business transfers data to maintain comparable security measures as your business adheres and have a contract in place to enforce such measures and processes.

- *Designate a Data Privacy Officer (DPO).* These bills also cover the requirement for an entity to designate one or more qualified employees as a privacy officer and to ensure that the Privacy Officer is involved in all issues relating to privacy and security of personal data.

In the case of a DPO S.1494, S.2968 and S. 4626 both expand upon and require greater importance of a formal DPO. The DPO is responsible for overseeing the policies and practices regarding the data collection and processing activities for your business and monitoring compliance with applicable laws.

4) *Overseeing of Service Providers/ Third Parties who process data on behalf of the controlling business.*

If your business works with service providers and/or third-party affiliates who process data on its behalf, they must be vetted for reliability and be contracted with specific requirements to process or transfer the data they receive from you, only for the purposes stated within the contract and at your business's direction and approval. You must have continual oversight concerning their business activities to make sure they are following their contracted purpose and the applicable laws, as they relate to your own business.

Upon termination of such a contract and/or completion of their processing function, the service provider/third-party must return, delete or deidentify the data that they have received from your business.

The service provider and third-party also must not process consumer data for a purpose not aligned with their reasonable expectations, nor for a secondary purpose, unless first receiving the consumer's affirmative express consent.

It is note-worthy that these four proposed federal privacy bills and others do not encroach on current state data breach notification laws but preserve their provisions.

To date, the United States does not yet have in place a comprehensive federal law to govern data privacy. What we do have is a complex series of regulations that address various components of data privacy with many overlapping regulations. This has not only proven to be complicated and costly but perplexing to those lacking the necessary resources and experience.

Therefore, many have been pushing for a comprehensive federal privacy law offering regulatory guidance with protection for the consumer and control over how personal information is utilized and managed.

It is prudent for all entities to understand and plan based upon the great likelihood that one or some combination of these proposed bills will become law. By focusing on the common elements, it is most likely that those preemptive actions will be correct.

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#### ABOUT THE AUTHOR



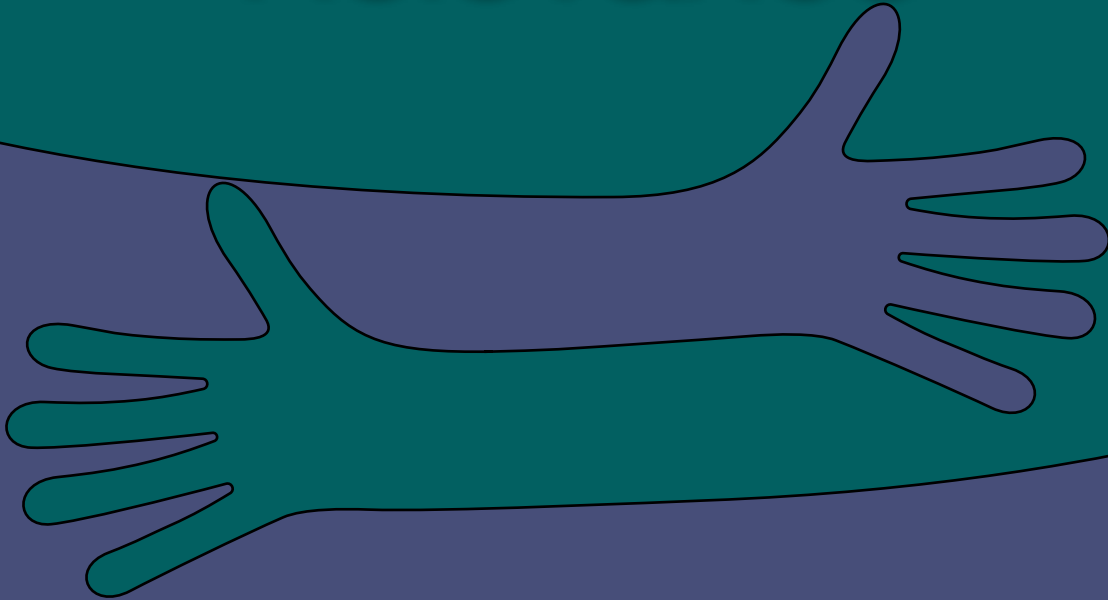
**Ross Federgreen** FIP, CIPM, CIPP/US, G, E, C is the CEO of CSR Privacy Solutions.

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CSR Privacy Solution's Inc (CSR) focus is Cyber-Privacy and is the world's largest provider of privacy regulatory compliance programs for the SMB population. CSR has a substantial consulting practice providing services to global 500 corporations, governments, and non-profits.



# Embracing Certification's New Relevance



*i-SIGMA CEO Bob Johnson explains how the coming changes will further emphasize and clarify the value of the association's industry-leading certifications.*



Over the decades, the service provider certifications offered by i-SIGMA have become integral to the fabric of the secure data destruction and records management industries. And, while their specifications have evolved to keep up with changing regulatory changes, so has their relevance.

From their origins as market distinguishers and client reassurance, these programs have emerged to become tools by which clients are able to meet their data processor selection regulatory requirements, while at the same time helping service providers identify and implement the policies, procedures, and security necessary to operate within a global regulatory framework.

More than anything else, this accomplishment has required a constant vigilance by the association to monitor and respond to the ever-changing data protection regulations around the world and a willingness by service providers and the board of directors to evolve the programs to meet those demands.

Nowhere is this attentiveness and adaptability more apparent than the five changes listed below, all of which will be effective the first of January 2022, and all of which herald a bright future for the service providers willing to embrace them.

## #1 - THE GREAT “CLARIFICATION” & THE RESULTING OPPORTUNITY

As most readers already know, starting in the New Year, NAID membership and PRISM International membership—and their respective membership logos—will be a thing of the past. They are being replaced by i-SIGMA membership and its logo.

To put a finer point on this, as of 1 January 2022, references to NAID and PRISM International membership will be deemed inappropriate and misleading, since, legally, the members of the organization voted to do away with them earlier this year.

If this is new information or one might be questioning why members made this decision, it was to overcome ongoing market confusion between membership

and certification. Once fully implemented, all members will be i-SIGMA members, while “NAID” will strictly be associated with NAID AAA Certification, and references to “PRISM” will be limited to PRISM Privacy+ Certification.

With this new clarification comes the choice and opportunity to transition from being a NAID or PRISM member to becoming certified. Clients who have already come to know NAID and PRISM as representing service provider qualifications will continue to do so. Whether those clients had been aware of the difference between membership and certification in the past, it won't matter in the future. With regard to NAID and PRISM, certification is all they can mean.

Will some service providers decide not to renew if they can no longer use the NAID or PRISM membership logo? Probably. But, on the other hand, now knowing that customers can no longer be confused, other high-quality service providers, for whom the preexisting confusion was a negative, will make the transition.

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## #2 – COMPLIANCE MONITORING: THE TRUE VALUE OF CERTIFICATION

Much has been written about the i-SIGMA Compliance Monitoring Service. In the coming months, many service providers will use it and soon clients around the world will begin seeing promotions encouraging them to use it too. And, if the underlying assumptions behind its creation are correct, they will eventually come to rely on it as a vital demonstration of their own regulatory compliance.

All data protection regulations require clients to demonstrate initial and ongoing due diligence when selecting third-party service providers to process personal information. The key word there is “demonstrate.” In fact, when a large investment firm was recently fined after its discarded electronics exposed

personal information about its clients, the judgment was based on the fact that they failed to employ “adequate due diligence in selecting a vendor and monitoring its performance.”

Of course, the challenge to clients (such as the investment firm) of complying with such regulations is that, 1) they rarely have the bandwidth to perform such due diligence and, 2) even if they did have the bandwidth, they can hardly be expected to know what to look at. Enter i-SIGMA certification program, which are not only designed to review the relevant regulatory and security overlap, but to do so on an ongoing basis.

By obtaining the automatic reports issued by the i-SIGMA Compliance Monitoring Service, the client has evidence by which they can demonstrate both initial and ongoing compliance of their service provider. In short, the client themselves gets the tangible benefit of being able to demonstrate their own vendor-selection compliance requirements.

Clearly, any client will see the value of obtaining this free report, and once they are aware it is available will come to insist on it.

*In the event of a breach, the first thing a regulator is likely to ask is “Who is the employee responsible over this?”*

### #3 – REQUIRING THE ASSIGNMENT OF A DATA PROTECTION OFFICER

The regulatory requirement to designate an individual as being accountable for regulatory compliance is not a new concept. The EU Data Protection Directive had it back in 1995. And, though less specific in the requirement, HIPAA and GLBA in the US and PIPEDA and the PIPAs in Canada, include the principle of management accountability for data protection regulatory compliance.

Of course, it stands to reason. How could any organization reasonably expect to be compliant if there is no one specifically responsible? In the event of a breach, the first thing a regulator is likely to ask is “Who is the employee responsible over this?” I am sure any reader can imagine how negligent it would appear to answer, “No one,” or “We don’t know.”

That being said, the assignment of a Data Protection Officer (DPO) should not be taken lightly. In order for it to withstand regulatory scrutiny, the individual selected should have a capacity to both understand what is required, and the authority and lines of communication to assure compliance.

Luckily, i-SIGMA certifications do most of the work for them, insofar as they have identified and addressed the relevant compliance overlap, and will continue to monitor and implement changes in that regard. Stated another way, should a firm hold one of i-SIGMA certifications, the DPO of that firm can be reasonably sure they are doing all that is necessary to be compliant from the perspective of a data processor.

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Provider Option

Choose Provider

Where to Send

Confirmation

Finish

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For technical questions while using this tool, please contact [webhelp@sigmaonline.org](mailto:webhelp@sigmaonline.org).

<https://directory.isigmaonline.org/compliance/>

## #4 – REQUIRING THE ASSIGNMENT OF A CERTIFICATION COMPLIANCE OFFICER

In the coming weeks, i-SIGMA will be holding free webinars on the role of the DPO and options for compliance. It should be noted that in Europe, where the DPO is a more formally defined entity with important statutory obligations, many service providers, including many i-SIGMA members, are outsourcing this function. Whether this will happen elsewhere in the world is yet to be seen. The purpose of the webinars is to make sure members know the issues, know their options, and make prudent decisions.

Closely related to the new DPO requirement, also starting the first of January 2022, i-SIGMA certifications will require service providers to designate an i-SIGMA Certification Compliance Officer (ICCO). While it is envisioned that some service providers will name the same individual to be both DPO and ICCO, that cannot be assumed. While the DPO may be outsourced depending on the preference of the service provider, the ICCO must be an employee of the certified service provider with the authority and accountability to reasonably ensure certification compliance across the enterprise.

## #5 – ADDING AN IMAGING/DIGITIZATION ENDORSEMENT

While NAID AAA Certification includes a number of “endorsements” that apply to various methods of media destruction, up until now, PRISM Privacy+ Certification has been limited to Records Storage. That is no longer the case.

The i-SIGMA Board of Directors recently approved an Imaging/Digitization Endorsement for PRISM Privacy+ Certification, which will allow members providing scanning, imaging, and digitization services to demonstrate their compliance with industry-accepted best practices. As with all i-SIGMA Endorsements, there is no additional fee

## What to Watch for in Illegitimate Certifications

*Here are a few items clients should keep an eye out for in vetting legitimate certifications vs. those that are not up to par. Note, this list was originally published in Issue 2 of the 2019 iG Journal; [read the article](#) to access the full list.*

### Falsely Claiming to Meet Certification Standards

This happens when a service provider represents they meet the NAID AAA or PRISM Privacy+ Certification standards but fails to complete the required audits. They do not claim to be certified but instead claim to “meet” the requirements.

#### THE PROBLEM:

The claim to “meet” NAID AAA Certification or PRISM Privacy+ Certification standards is a “false” claim; the third-party audits, scheduled and unannounced, built into the program are as critical as any other specification. A service provider cannot “meet” the standard if they are not subject to the

audits. Self-declaration defeats the integrity of submitting oneself to the scrutiny of unannounced audits, which is an essential component of the program’s ability to ensure a customer is fulfilling their due diligence obligation reference earlier.

#### THE REMEDY:

Same as #1 above... Clients should verify a company’s NAID AAA Certification or PRISM Privacy+ Certification on the association’s Service Provider Locator, [directory.isigmaonline.org](#).

### Promoting Use of “Certified” Software or Equipment as a Qualification

Computer recyclers sometimes advertise their use of “certified” software overwriting solutions. Additionally, service providers that provide physical destruction or degaussing of media, sometimes advertise their use of “certified” or “approved” equipment.

#### THE PROBLEM:

The fact that a service provider uses “certified” software or equipment says nothing about their employee screening or training, regulatory compliance, access controls, or breach notification preparedness. Despite many requests, NAID and PRISM International have

for members adding this endorsement, and compliance is based on meeting a limited number of applicable requirements in addition to those already required for PRISM Privacy+.

As digitization increases in popularity over the coming years, and as regulatory pressure on clients continues to favor service provider certification, the new endorsement is also expected to attract new members seeking the assurance of the program and the advantages of the new Compliance Monitoring Service (#2 above).

### PURPOSE AND POISE

i-SIGMA certifications have –by necessity– always been dynamic and responsive. And, while this puts demands on both leadership and service providers,

these are the very factors that have been the key to their continued adoption. Data protection regulations do not change on a schedule, and data protection certifications do not have the luxury of only being updated every five years.

In the regulatory environment that is now emerging, clients will not have the time, knowledge, or inclination to verify on an initial and ongoing basis that service providers responsible for their compliance are doing the right things. It is clear that they will continue to turn to legitimate, relevant certifications.

### ABOUT THE AUTHOR



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refused to certify the efficacy of software and equipment specifically because customers could be misled that its use implies the services using them meet overall operational requirements.

### THE REMEDY:

Clients should not rely on the use of certified software or equipment as a measure of a service provider's operating qualifications and, furthermore, clients should be suspect of any service provider proposing their use of certified software or equipment as the sole measure of their security and regulatory compliance.

## Claiming an Inferior Certification

Regulatory requirements for clients to validate service provider qualifications have led to the creation of questionable and inadequate certifications.

### THE PROBLEM:

Service providers hoping to prey on clients' unfamiliarity with legitimate certifications, obtain inferior, self-certification, requiring no audits and no transparent specifications. Often, these certifications are created and sponsored by a for-profit organization with little transparency or accountability.

### THE REMEDY:

When presented with a questionable certification as a vendor qualification, clients should verify the certification body itself is legitimate, and that its corporate structure is that of a non-profit required to maintain the appropriate level of transparency.

## Claiming to Meet an Un-Auditable Standard

There are some legitimate standards that do NOT require an audit regime. Because no audit is required, there is nothing inherently wrong with a service provider claiming to meet them. NIST 800-88 is an example; any firm may claim to meet the standard with no third-party verification.

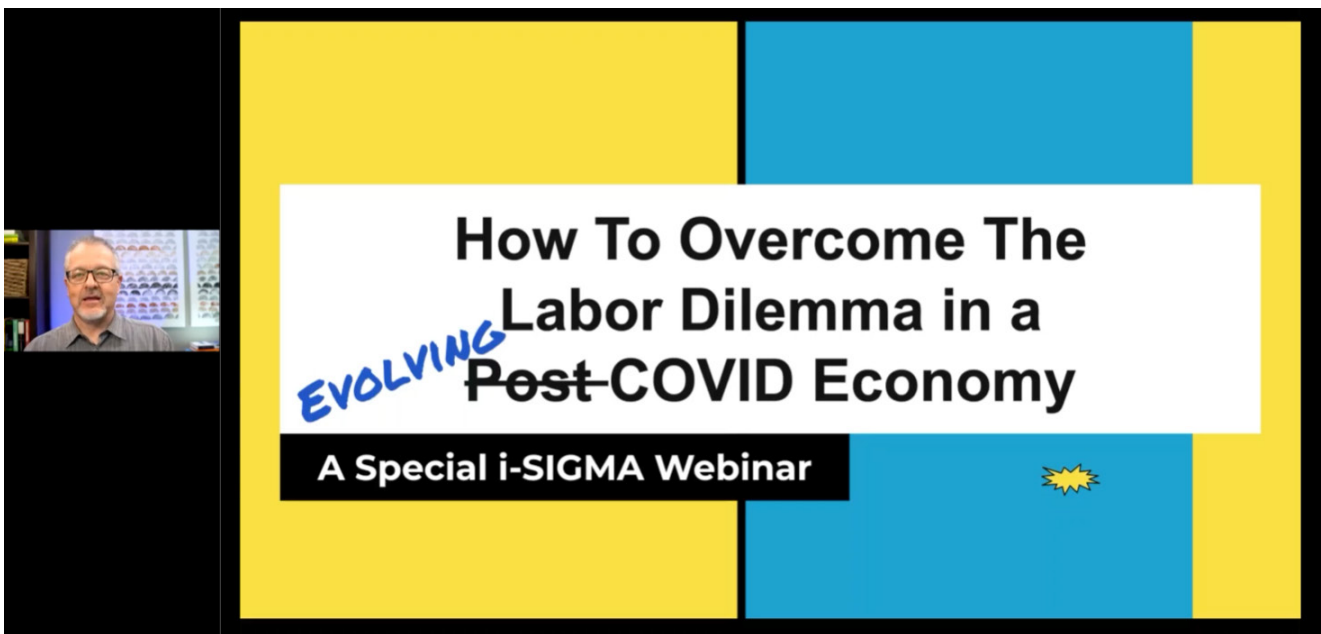
### THE PROBLEM:

The unaudited claim to meet the NIST 800-88 for media sanitization or the D.o.D. standard for hard drive wiping (no obsolete) is intended to infer some assurance to the client, when it is really no more than a claim. It may or may not be true, and there is no assurance in and of itself.

### THE REMEDY:

Where a service provider suggests they "meet" a standard, it is important to know who is auditing it and how it is audited (frequency, random, auditor qualifications, etc.) to understand the validity behind the claim.

# i-SIGMA Webinar Provides Critical Staff Onboarding and Retention Tools



As you have most likely seen in the news and possibly felt, there is a recent labor shortage that has reared its head as yet another consequence of the ever-evolving pandemic. This very real labor shortage has affected essentially all industries, including the data destruction, RIM, and information governance industries.

Businesses are experiencing major roadblocks finding and hiring entry level staff. In this “employee market,” supervisors and management team members are even more transient

than before, seeing now as the prime opportunity to get a bigger or better job. This reality has amplified the flaws in staff hiring and retention programs. Without the right staff, businesses have found themselves unable to provide timely services or deliver them effectively.

With this newly prevalent labor shortage very much all around us, i-SIGMA decided it was essential to host a webinar with Executive Coach & Industry Advisor Tom Adams. The goal was for Adams to

provide attendees with practical ideas and proven methods to hire and retain good people for their business. And boy, did it deliver.

The time flew by in this hour and a half webcast, where Adams captivated the audience with practical and digestible tools, tips, and resources that are easily applicable across all businesses. Adams discussed opportunities that may currently be underutilized within your organization. These tips related to strategic hiring mindsets, recruiting pipelines and funnels, selection and interviewing techniques, onboarding, and staff retention.

One of many key points that was covered was the importance of retaining the staff you already have. Adams mentioned that almost 88% of employers are experiencing higher turnover rates, and that 50% of employees quit because of their manager. This led Adams into discussing the importance of prioritizing positive leadership.

Another great segment discussed in this webinar was the organization and implementation of following a hiring plan within your business. The importance of scouting talent beforehand can be critical, especially as hiring during a point of desperation never quite yields the most beneficial results. With the examples and downloadable tools provided, attendees were given a great starting point for getting all of their ducks in a row.

This webinar is not just for those currently in a hiring and retention rut; this webinar is critical to all businesses to ensure staff contentment to avoid future dilemmas.

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CSDS: While this article is not worth any CEU, the webinar recording is free for CSDS and **worth 2 CEU** credits; contact [accreditation@isigmaonline.org](mailto:accreditation@isigmaonline.org) to obtain your promotional code.



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# Getting Ahead of Parts Delays & Shortages It's All in the Planning

Interview & Editor's Notes  
By: Kelly Martínez

*While the impacts of the labor shortage are becoming more evident with each passing day, not everyone may be aware of another major shortage. The backend of the RIM and Data Destruction Industry is feeling unprecedented parts delays and deficiencies, impacting both repairs and new inventory production.*

*i-SIGMA reached out to the association's Corporate Partners that manufacture or restore destruction equipment and mobile vehicles to get their firsthand insights and what it means for service providers looking for equipment to run their businesses so they can remain successful.*



The following Corporate Partner Representatives joined us in the conversation on this important and timely industry issue.

- **Jeffrey Burnley** of Advanced Equipment Sales (AES)
- **Cameron Cecil** of Vecoplan, LLC
- **Michael Harstrick**, CSDS of Garner Products, Inc
- **Lex Katich** of Shred-Tech
- **Rocky Rajewski** of ShredFast and ShredSupply
- **Renee Schafer**, CSDS of Data Security, Inc
- **Guy Wakutz** of Alpine Shredders Limited

### What is happening on the backend of the market with parts delays and shortages and how does that impact vehicle/equipment production?

**Lex:** Across the Globe many manufacturing companies have been negatively impacted by the current Pandemic.

**Renee:** Parts shortages are hitting every industry. Orders are delayed longer and longer. It's forced manufacturers to be more versatile and innovative than ever.

**Rocky:** The pandemic has literally obliterated the term "just-in-time inventory", which is a common practice used in manufacturing and supply chain distribution. This impact has created a buying frenzy in specific product categories such as electronics. The only way to truly know what you have available to sell is securing materials through purchasing so that those goods are in your inventory.

**Cameron:** During production, many basic and essential items are becoming scarce and more expensive. Items like electrical, body, and chassis components are more important than ever to plan for.

**Lex:** From computer chip shortages causing chassis delays to shipping and supply chain problems creating parts delays, most have been affected in some capacity.

**Guy:** Typical lead times pre-pandemic for most parts/components was 2-4 weeks...now that is 12-16 weeks, and some suppliers are not even taking orders because they don't know when they will be receiving inventory.

**Editor's Note:** It was great to hear from all our contributors that they have planned for the situation though, with most ordering months to a year in advance to ensure their production line remains as covered as possible, and others creating solutions.

**Michael:** While we tend to buy parts and supplies several months in advance, currently there are some raw steel types that are just not available. At all. This requires sometimes re-designing and re-tooling for building the needed parts as we build 85% of the parts in our equipment. In some cases, we have to substitute parts from a different supplier, which means the parts must not interfere with our CE, ETL for UL, CSA and IEE certifications.

**Renee:** It's also pushed us to look for alternate vendors as well as parts. So far, we have been able to fulfill orders in our normal time frame. Our Pandemic Plan has instrumentally helped us.

**Editor's Note:** And it isn't all bad news...

**Jeffrey:** While all equipment markets have been experiencing delays in manufacturing, we have recently seen lead times improve. We expect this trend to continue in the positive direction.

### If a service provider wanted to order a new mobile shredding truck or plant-based shredder, how far in advance do they need to plan that?

**Editor's Note:** Responses showed that production times vary by manufacturer and specific equipment, from favorable lead times to six-plus months out.

**Lex:** Orders are picking up and supply chain issues lingering that could affect future builds. My suggestion, if you're needing something in 2021, don't wait to get the order placed!

**Cameron:** Now more than ever, planning ahead is important.

## What does the situation mean for parts and repairs?

**Editor's Note:** Jeffrey summed it up the feedback from all the Corporate Partners well.

**Jeffrey:** The lead time for commonly used repair parts has remained fairly consistent. Specialty parts or main components may have longer lead times. We always recommend planning and budgeting for routine maintenance well in advance, so there are no surprises.

**Rocky:** Chassis parts – especially critical parts for emissions control systems are starting to impact customers. New replacement parts are having a hard time finding a spot on the shelf as they are getting redirected to new chassis production builds. I recently visited a chassis manufacturing plant that had several brand-new chassis on the ground that were missing a component, so the truck could not be shipped to the dealer then customer.

**Editor's Note:** But Lex reminds us, that isn't the only factor.

**Lex:** Service men in the field have had struggles with travel due to COVID restrictions, making it difficult to respond to all repair needs quickly.

## On that note, are there other considerations that need to be considered?

**Renee:** Production doesn't happen overnight. Parts are built by companies being impacted by COVID. Maybe they can't get their components, or they are having staffing/hiring issues. When we get those parts for our production, we are being impacted by the pandemic.

Our biggest impact is staffing. Manpower needs to be taken into account. The USA has a problem country-wide of businesses not being able to hire employees. This is affecting parts production as well as shredding and degaussing manufacturers. But it is also affecting i-SIGMA Members. This is where process improvement and use of products can help provide a revenue stream. Use quick efficient machines that can be manned by less staff.

**Jeffrey:** The labor shortage is one of the biggest factors affecting the manufacturing of industrial equipment. Additionally, the cost of raw materials has gone up, as have wages, resulting in manufacturer's raising prices on their equipment.

**Michael:** On the outbound side, we ship globally. Today, freight and delivery estimates outside the US are good for 24 hours, at best. This makes the Quote to PO process difficult as a quote from two weeks ago, may fluctuate by over 100% by the time the equipment ships, which in turn affects the PO the customer has already approved. So, it goes through a new approval process, at which point shipping might have changed again...

**Rocky:** Acquisitions, there are a lot of rollups taking place right now to secure supply chain or expand market share. We just saw this with the EATON and Danfoss merger which supply the vast majority of hydraulic componentry to our industry that you would find on your mobile shredding truck. Product lines within these supply companies can change at a moment's notice so we encourage shredding truck buyers to really drill down and ask about where the parts are all coming from that make up the shredding system. You may have recently purchased a new shredding truck but that does not exempt the buyer from a component failure within its warranty period. The term "warranty" is only as good as the parts and service behind the product.

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### As an alternative, how can used equipment be a solution? And what should buyers consider?

**Guy:** Used equipment can be a good option as long as there is due diligence to ensure the product is good. Full maintenance and repairs history should be the bare minimum and have a qualified mechanic or technician go over the equipment pre-purchase.

**Cameron:** Buyers should be careful though when buying any piece of used equipment especially a truck. Manufacturers like us do offer warranties on used equipment and sometimes that is priceless.

A shred truck cannot be viewed as a used vehicle. Half of the purchase is the chassis; in some regards, this is the “used car” portion. Repairs on a chassis can be much more costly, so be careful on this part and have it checked by someone who truly knows what they are doing. The shredding portion also needs to be carefully checked over, fixed, or refurbished depending on the situation.

On the plant-based side, buyers be wary of “factory refurbished”. In many cases these units are only painted. [We recommend] the entire machine is stripped, all wear items are replaced, body damage is fixed, and the drivetrain is completely gone through.

**Rocky:** We believe this is a two-pronged approach, one – if you have a need to purchase a used shredding truck and two, if you already have a backup truck. Although used can have unforgiving repair costs at the time, it’s a known value in your parking lot given the current climate. Used medium-duty trucks are forecasted to have a higher value for the next 12 months simply because new medium-duty chassis can’t be produced fast enough – supply vs demand. If you’re looking to purchase a pre-owned vehicle, team up with a company that can help walk you through what to look for or local repair shop for guidance on what they can support you best with. We commonly find that if a service provider has a backup truck



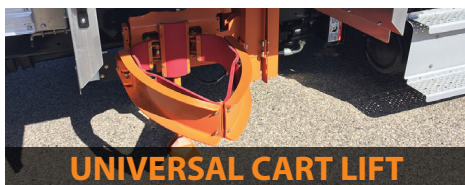
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there might be some lingering items that need to be fixed in order for that asset to perform appropriately. Now is the time to analyze if appropriating funds to a backup asset is worth your while or if it is better to wait for new equipment options, knowing that delivery dates may impact your planning.

**Jeffrey:** Used equipment may have an attractive price point, but this could end up costing more in the long run with equipment repair costs and unexpected down time. Most document destruction companies do not have full-time maintenance staff, so when an issue arises, they need to call in an outside resource. Many service providers are also dealing with labor shortages, so you can see how a breakdown could snowball into significant downtime. That's why we recommend buying refurbished equipment with a warranty.

Not all rebuilt equipment is the same, so make sure you know what work has been done to the equipment and more importantly, what hasn't. Refurbishing [should include] the disassembly and cleaning of all components, a full operational inspection, and the repair or replacement of worn or damaged parts and guards, [as well as] a checklist to help manage future repair items and a preventive maintenance schedule. Always ask your equipment provider to document their refurbishment procedures and future maintenance needs prior to taking delivery. This will help ensure your used equipment delivers real value and a reasonable payback period vs. the as-is equipment purchase.

### How long do you foresee this lasting?

**Editor's Note:** There is no crystal ball for how the situation will pan out, and estimates vary.

**Cameron:** It may go into 2022 if manufacturers continue to have a shortage of labor and there's a continued chip shortage.

**Guy:** There are so many factors in the current fragile global supply chain to cause delays that will not be resolved in the short term. We anticipate about two years before it is back to "normal" and that will be a "new normal".

**Michael:** There is no foreseeable end to this as the COVID virus seems to come up with new mutations that defeat all the measures taken to date. We simply ask our buyers to bear with us, we are all in the same boat. [We are pulling] out all the stops to keep up with demand as especially larger customers are focusing on truly secure destruction—the Morgan Stanley story has been motivating.

### Anything else you'd like to add?

**Guy:** Being proactive in business is one of the cornerstones of success, but now it becomes essential for basic business survival. Companies with no specific short- and long-term planning, including adding equipment/capacity and preventative maintenance programs for equipment, will be the most susceptible to the problem of supply chain shortages.

**Lex:** If there is one takeaway from this article, it would be to make sure and choose your business partners wisely. Even though you can't predict a pandemic, you can choose successful strategic partners who will help you weather the storms and continue to provide products, parts, service, or resources when most critical to the success of your business.

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AES is a full-service provider of baling, shredding, and scrap conveyance systems that works to help business achieve greater profitability, productivity and sustainability in their recycling programs.

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Shredfast/ShredSupply is a manufacture and remanufacturer of mobile document shredding and transport vehicles; our products and services extend throughout North America.

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Data Security, Inc. is a provider of digital data destruction equipment; they design, manufacture, and distribute cutting edge equipment to ensure data is destroyed from E-Waste.

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## A Word On Recent Natural Disasters

*A Member's Perspective by Stefan Chorus, Streff – Data Protection Services (PSF) S.à r.l (Luxembourg)*

Summertime and yes, we all like to enjoy sunny holidays.

But especially obvious this year are the many “natural” disaster’s that have hit many areas and many people around the globe.

Maybe you have heard it in the news, two weeks ago, around the 14th of July, heavy rain hit our region.

Nearly 200 people did not survive in Germany and Belgium.

Little courants quickly turned into torrent waters ripping through houses, streets, motorways, rail tracks, cars, trucks and anything else in their paths.

No electricity or telecommunications in some places even today.

Hardworking people have lost their livelihoods and do not know how to recover.

Businesses are closed, perhaps forever.

In Luxembourg we were, this time, lucky not to have lost any lives.

But many basements were flooded including a number of archive rooms.

Now, we are in the process to clean up and help to get rid of the totally wet documents which can not be recovered.

As a private person and in my capacity as a LIONS member and president of our “Foundation Lions Luxembourg ” we partner with local authorities to help finance some urgently needed equipment for the victims of the flooding.

I would like to encourage all readers to step in locally in your communities to help in cases like these.

Solidarity with the people in need should be high on anyone’s agenda.

Money, expertise, physical engagement, whatever you can provide.

Imagine you would be next to be hit by disaster.

Sure you would appreciate any help as well.

In spite of this rather sad story please enjoy everyday as much as you can.

With kind regards,

**Stefan Chorus**

**Streff – Data Protection Services (PSF) S.à r.l  
LUXEMBOURG**

## DHS Announces Expansion to Quality Assurance Team and the Release of the Total Recall Software Version 8.9/4.9

DHS Worldwide Software Solutions, an i-SIGMA Corporate Partner, is proud to announce the recent expansion to the DHS support and Quality Assurance Team. This growth strengthens the Quality



Control / Data Security division in response to the evolving IT security landscape. DHS is also proud to announce the release of Total Recall SQL Version 8.9 / Envision Version 4.9. The new release is strongly focused on security and performance.

“Considering today’s changing technology environment”, says VP of Research and Development, “DHS is committed to providing the most secure solutions that also promote high security within our customer’s organizations.”

The major themes of the mid-2021 release also includes Cash Flow Acceleration, Warehousing Automation, Chain of Custody Reinforcements and Optimized Route Planning. The Client Web Access portal features several new security enhancements based on new browser version updates. New commercial web offerings include new web alert options which better supports corporations and governmental agencies information governance policies.

The new version also provides increased chain of custody steps (i.e., offload and onload truck at customer) for drivers. New records sizing features are also available in the Android Envision mobile application supporting alternative methods for assigning storage codes to inventory. For customers with high scheduled order volumes per route, a new sequence option has been added which supports rapid sorting of jobs.

For a list of all new features, DHS users are encouraged to review the latest revision documentation accessible from the Help menu – Documentation in the Total Recall software.

DHS Worldwide provides information management technology for commercial, corporate, and governmental organizations. Over 1200 RIM operations around the globe have trusted Total Recall software by DHS Worldwide. The Total Recall software suite of products includes Records Management, Secure Destruction, Data Protection and Digital Imaging offerings. For over 26 years, DHS has empowered organizations to succeed by providing innovative solutions and industry expertise.

## American Baler Company Announces Improvements to the 2-Ram Baler Lineup

American Baler Company, an i-SIGMA Corporate Partner, is proud to announce improvements to their 2-Ram balers. The W721 and W828 2-Ram balers now come with a power unit and manifold block designed with off the shelf Parker Din Cartridge valves on the manifold and standard Directional Control Valves. All the



pumps have their own Pressure Control Kit for all (3) stages of pump. No unloader blocks.

“Warranty claims were higher than desired with our manifold blocks and our engineering risk evaluation model led us to these cartridge valves”, says Jim Wolfe, VP Engineering & Customer Service.

“The new design is easier to build with less errors”. Mike Schwinn, Sales Manager, adds, “This change was implemented in our larger W828 series two years ago and the results have been superb, so improving the W721 was a logical next step”.

The W721 2-Ram series is American Balers most popular model. While it is a wide body baler, it is priced closer to many narrow body machines. This great price point fits many MRF applications as well as paper, plastic, and non-ferrous metals plants.

American Baler Company manufactures recycling balers used in distribution centers, manufacturing, and recycling centers world-wide. For more information: 800-843-7512 x 145, [www.americanbaler.com](http://www.americanbaler.com)

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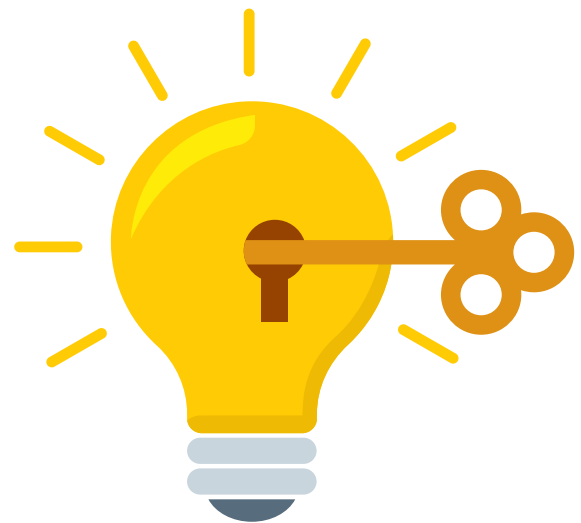
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SAVE the DATE:  
11-13 April 2022  
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### CSDS Exam

11 April 2022  
Orlando, FL, USA

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