E-Waste and Data Disposal Checklist for Companies in India

A practical list for IT, admin, facilities and compliance teams retiring laptops, servers, phones, appliances or industrial electronics. Tick each item before, during and after a pickup.

1 Know where you stand

- ☐ Check whether you are a **bulk consumer** under the E-Waste (Management) Rules 2022: an organisation that has used 1,000 or more units of listed electrical and electronic equipment in a financial year.
- ☐ Name one owner for e-waste and data disposal (IT, admin or EHS) and one backup.
- ☐ Write a one-page disposal policy: what gets reused, what gets wiped, what gets shredded, and who signs off.

2 Before the pickup

- ☐ Make an inventory: asset tag, type, make, model and serial number for every device, and serial numbers of every hard drive or SSD.
- ☐ Mark which devices held sensitive data (finance, HR, health, legal, R&D, customer records).
- ☐ Back up anything still needed and sign devices out of company accounts, MDM and asset-tracking tools.
- ☐ Decide the method per device: certified wipe (reuse or resale) or physical shredding (failed drives, very sensitive data, tapes and discs).
- ☐ Store retired equipment in a locked area with a count, not in open store rooms. Avoid letting it pile up for months.

3 Choosing a recycler or refurbisher

- ☐ Ask for the vendor's registration details and check them yourself on the CPCB E-Waste EPR portal. The Rules require bulk consumers to hand e-waste only to a registered producer, refurbisher or recycler.
- ☐ Ask which data destruction standard they follow (for example NIST SP 800-88) and whether you get a record for each serial number.
- ☐ Ask how the material travels from your site to the facility (sealed, counted, vehicle details) and where it is processed.
- ☐ Avoid informal scrap buyers, even for "small" lots. Unwiped drives are a data breach risk.

4 On pickup day

- ☐ Count and match items against your inventory with the vendor's team; both sides sign the handover list.
- ☐ Record seal numbers, vehicle number, date and time.
- ☐ If drives are wiped or shredded on site, have someone from your team witness and note serial numbers.

5 After the pickup: documents to keep

- ☐ Signed handover list and weight or count of material handed over.
- ☐ Data destruction record for each drive or device: serial number, method, tool, date, result, verified by.
- ☐ Recycler or refurbisher documentation as per Pollution Control Board norms, matched to your inventory.
- ☐ File everything with the asset register. Check with your State Pollution Control Board whether an annual return applies to you.

6 Data protection (DPDP Act 2023)

- ☐ Treat retired devices as personal data still in your care until they are wiped or destroyed.
- ☐ Make sure personal data no longer needed is erased, and keep proof that it was.
- ☐ Note the timeline: the DPDP Rules were notified on 14 Nov 2025 and most duties, including security safeguards and erasure, apply 18 months later.

Planning an IT refresh or office clear-out?

Khanija collects retired IT and electronics from offices, plants and campuses across India, provides certified data destruction by NIST 800-88 wiping or physical shredding, and recycles the material at its facility in Malur, near Bengaluru. You receive the documentation as per Pollution Control Board norms for every lot.

Book a pickup: khanija.com/contact-us | WhatsApp +91 99452 54009

This checklist is general guidance, not legal advice. Rules can change; check the current E-Waste (Management) Rules 2022 and DPDP Act text or ask your compliance advisor. Sources: E-Waste (Management) Rules 2022 (MoEFCC); NIST SP 800-88 Rev. 2 (Sept 2025); DPDP Rules 2025 (PIB, Nov 2025).