



Privacy Policy

Effective Date: 02/10/2021

Introduction

Opportunity Distributing Inc. (ODI) is committed to safeguarding the privacy and security of personal, business, and governmental data entrusted to us. This Privacy Policy explains how we collect, use, protect, and manage your data in compliance with industry standards, certifications, and applicable laws and regulations.

1. Data Collection and Types of Data

ODI handles various types of data storage devices that may contain sensitive data, including but not limited to:

Personal Data: Information identifying an individual, such as names, contact details, location data, biometric data, and genetic data.

Business/Organizational Data: Confidential and proprietary data, including trade secrets.

Government Data: Confidential and classified information.

Devices containing non-personal or non-confidential data are also accepted for processing.

2. Purpose of Data Handling

ODI processes and sanitizes data storage devices to ensure:

The security, privacy, and protection of sensitive information.

Compliance with legal, regulatory, and contractual obligations.

Sustainability through responsible recycling and reuse.

Opportunity Distributing Inc.

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3. Certifications

ODI adheres to globally recognized industry standards to ensure exceptional quality in data security and handling. We are:

NAID AAA Certified: This certification demonstrates our compliance with stringent standards for logical and physical data sanitization. It assures customers that we meet or exceed industry best practices for secure data destruction.

R2v3 Certified: As an R2v3 Certified Facility, we uphold the highest standards for the responsible recycling, reuse, and refurbishment of electronic equipment, ensuring environmental sustainability and data security.

4. Data Sanitization Process

ODI implements stringent sanitization procedures tailored to each type of data storage device, including:

Overwriting or shredding hard drives.

Destruction or incineration of magnetic tapes and removable storage.

Using specialized tools (e.g., PhoneCheck) for mobile devices and wearables.

Factory resetting and dismantling devices when applicable.

Devices are sanitized within 90 days of receipt, or sooner if specified by contractual obligations. Records of sanitization, including Certificates of Destruction, are maintained for transparency and accountability.

5. Downstream Vendor Compliance

ODI partners exclusively with downstream vendors who are registered with SERI (Sustainable Electronics Recycling International) and comply with the R2v3 Standard. This ensures all electronic waste is responsibly recycled, reused, or refurbished in accordance with industry-leading practices. Transparency is maintained through our documented Downstream Recycling Chain Flowchart, which tracks vendor compliance and geographical locations.

6. Data Security Measures

ODI enforces robust security measures to protect data during its entire lifecycle, including:

Limiting access to secure areas to authorized personnel only.

Requiring confidentiality agreements and specialized training for employees handling sensitive data.

Conducting annual internal audits to validate compliance with the R2v3 Standard, NAID AAA Certification requirements, and legal obligations.

Reporting and investigating suspected data breaches promptly and transparently.

7. Customer Rights

As a client of ODI, you have the right to:

Request detailed information about our data sanitization and security processes.

Obtain documentation such as Certificates of Destruction for sanitized devices.

Verify compliance through our NAID AAA and R2v3 certifications and our downstream vendors' SERI registrations.

8. Legal and Regulatory Compliance

ODI complies with all applicable data protection and privacy regulations, including breach notification requirements. Suspected or actual breaches are managed and addressed per our Incident Investigation and Corrective Action Procedure.

9. Accountability

Our Data Protection Representative oversees compliance with this Privacy Policy and ensures alignment with industry certifications, legal requirements, and best practices. Violations of this policy by employees are taken seriously and may result in disciplinary action, including termination or legal consequences.

10. Updates to this Privacy Policy

ODI may update this Privacy Policy periodically to reflect changes in our practices, certifications, or applicable laws. Updates will be posted on our website and become effective immediately.

Contact Us

For questions or concerns about this Privacy Policy or our data handling practices, please contact:

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