

Media Sanitization Practices During Product Return Process

Best Practices Statement

Objective

This statement provides Seagate customers with an overview of what happens to products returned to Seagate. In order to protect your privacy and other interests in data, you should delete all data, or as much as possible, prior to returning any product to Seagate. Seagate realises, however, that you may not be able to erase certain data on returned products. While Seagate is not responsible for lost user data, Seagate will take the steps described in this statement for the physical security of such products and, if applicable, overwrite data as early as possible on products recertified by Seagate.

Seagate has coordinated with the National Security Agency (NSA) and the Center for Magnetic Recording Research (CMRR) to ensure that any products repaired by Seagate are in compliance with or exceed the appropriate U.S. Government specifications for drive sanitization. The National Institute of Standards and Technology (NIST) provides certain standards regarding drive sanitization. The relevant specification, contained in the December 2014 Special Publication 800-88 Revision 1, *Guidelines for Media Sanitization*, defines that an accepted drive sanitization for magnetic media is a *purging* of data on the media.

Similarly, the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) also provide standards regarding drive sanitization, which are contained in the July 2014 publication ISO/IEC 27040:2014, *Information technology — Security techniques — Storage security.*

NIST 800-88

NIST publication 800-88, section 2.5, Types of Sanitization:

"Purge applies physical or logical techniques that render Target Data recovery infeasible using state of the art laboratory techniques."

NIST publication 800-88, section 5, Summary of Sanitization Methods:

"Some methods of purging (which vary by media and must be applied with considerations described further throughout this document) include overwrite, block erase, and Cryptographic Erase, through the use of dedicated, standardized device sanitize commands that apply media-specific techniques to bypass the abstraction inherent in typical read and write commands."

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ISO/IEC 27040

ISO/IEC publication 27040, section 3.35, Terms and definitions:

"purge - sanitize (3.38) using physical techniques that make recovery infeasible using state of the art laboratory techniques, but which preserves the storage media (3.48) in a potentially reusable state"

ISO/IEC publication 27040, section Annex A.1, Methods used to sanitize media:

"Purge - Degaussing, cryptographic erase (see A.3), and executing the appropriate ATA/SCSI firmware commands to use block erase operations on both logically addressable and logically non-addressable physical media are acceptable methods for purging. Degaussing is not applicable to devices that contain non-magnetic media (e.g. SSD or SSHD)."

ATA Secure Erase

The AT Attachment 8 - ATA/ATAPI Command Set (ATA8-ACS) document defines the command SECURITY ERASE UNIT:

"When Normal Erase mode is specified, the SECURITY ERASE UNIT command shall write binary zeroes to all user data areas (as determined by READ NATIVE MAX or READ NATIVE MAX EXT)."

"When Enhanced Erase mode is specified, the device shall write predetermined data patterns to all user data areas. In Enhanced Erase mode, all previously written user data shall be overwritten, including sectors that are no longer in use due to reallocation."

The ATA Security Erase command, once initiated, runs entirely within the drive and reports busy until the command (full erasure) is complete.

Seagate has verified that not only does its repair process overwrite user-addressable locations, but the process also overwrites the non-user accessible locations. Seagate uses random characters, high-frequency patterns and digital-zeros patterns to match the drive design technologies.

What Is the Product Return Process?

Seagate maintains several collection depots throughout the world for the purpose of receiving warranty-returned product. These sites are highly automated and optimised to screen the returned products into two fundamental groups. A significant percentage of drives returned to Seagate are determined to have No Trouble Found (NTF). These drives are separated from the rest for a faster recertification process. The rest of the drives are shipped back to Seagate factories for evaluation and repair.

In the case of SATA interface NTF drives, Seagate uses the ATA SECURITY ERASE UNIT command, Enhanced Mode, as recommended by NIST 800-88 and ISO/IEC 27040. After media sanitization, the drives are relabelled and marked as Certified Repaired HDD drives.

In the case of drives returned to the factory, these drives are *reprocessed*. When drives are manufactured, after the physical assembly of parts, the drives are *processed*: The drive is given an initial low-level format, servo calibrations and media defects assessment and reallocation. New drives are fundamentally blank with regards to data. Reprocessed drives are blank in the same way. Reprocessing drives has the effect of full media sanitization and exceeds the ATA SECURITY ERASE UNIT command in thoroughness and coverage.

All Seagate® recertified drives have a unique top-cover label with a green border to distinguish them from newly built products. Both NTF and reprocessed drives are given this unique label.

Media Destruction on Failed Drives

Drives that are deemed not repairable or have no repair demand are scrapped and recycled for their metals. The scrapping procedure begins with physical destruction of the entire head and disk assembly, which completely destroys the media. Destruction of media is the ultimate form of sanitization. These activities are carried out effectively and securely prior to sending for raw material reclamation.

Seagate Self-Encrypting Drives (SED)

Many Seagate drives are available with a self-encrypting capability. All data written to the media is AES-128 or AES-256 encrypted using a unique encryption key. No two drives have the same key, so no two SED drives write the same data patterns to the media when given the same data to write. For SED drives, the SECURITY ERASE Enhanced command causes the SED encryption key to change, instantly rendering unreadable and useless any previous data on the device. This includes any reallocated sectors and should conform to NIST 800-88 and ISO/IEC 27040. Some Seagate SED drives have the further distinction of having FIPS 140-2 Level 2 validation, a U.S. government standard. Seagate SED and FIPS SED drives are always reprocessed.

Non-SATA Interfaces: SAS, SCSI and Fibre Channel

An internal secure erase command is defined by the ANSI SCSI specifications. It is called *Security Initialise* and is functionally equivalent to the ANSI ATA specification. In addition, the Sanitize command set is available on many products, which provides a single-command offline purge (erase) that runs until it finishes.

USB External Drives

USB drives have a SATA drive contained within them. A small circuit board bridges and joins the SATA and USB interfaces. Some USB bridge cards restrict the ATA SECURITY ERASE command, while others allow it. Newer Seagate USB products are given full media sanitization using the ATA SECURITY ERASE. Products that do not allow the command are given a full pack block overwrite of the media with zeros. Since

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Seagate USB products are built to full native maximum capacity, this full pack block overwrite is functionally equivalent to SECURITY ERASE in normal mode and therefore should conform to NIST 800-88 and ISO/IEC 27040 purging guidelines.

Other Seagate Utility Software (Block Overwrite) NIST 800-88 Clearing

The less-secure level below NIST 800-88 and ISO/IEC 27040 purging is called *clearing*. Clearing also overwrites all sectors on a drive as it is defined by the interface capacity commands. In other words, a drive may be defined smaller, which causes the blocks above the new size to become unknown to software-based block overwrite utilities. While rare, a size-adjusted drive hiding blocks is why clearing and purging media sanitization are different under NIST 800-88 and ISO/IEC 27040. Another difference between the two is the way the media sanitization activity runs. Clearing is managed block-by-block in the software; you can see it count up through the blocks and the software usually displays a progress bar. This type of control is subject to interception by malicious software. Purging software is a single command that puts the drive offline from the interface, where it runs (and is busy) until it finishes.

Seagate SeaTools™ utility software with various purging and block level clearing media sanitization options is available from the Seagate website at www.seagate.com/support/seatools.

DNR Drives in Transit (Drive Not Ready)

Seagate has established Standard Contractual Clauses (Commission Decision 2010/87/EU or any successor version), which are in place among Seagate entities and the vendors Seagate uses to transport returned DNR hard drives (Drive Not Ready). Standard Contractual Clauses are a lawful transfer mechanism for the extraterritorial transfer of personal information from the (EU) European Union to non-adequate countries outside the (EU) European Union.

Please note: some of the non-EEA European Economic Area countries are recognised by the European Commission as providing an adequate level of data protection according to EEA standards and do not require Standard Contractual Clauses. The full list of these countries are available here.

Summary

If data security is important to you while a returned drive is in transit to Seagate, you should consider clearing the drive's data before sending it. Your shipping service may provide delivery verifications, which may be important as you consider the previous data on the drive. Seagate is not responsible for lost user data. Once a product has been returned to Seagate, we protect the physical security of the drive. Furthermore, we perform best-practice media sanitization as early as possible to remove the data that was brought with the device.

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