

1 Quality Policy

Iron Mountain is committed to continually improve its services in order to attain the maximum quality level required by our customers. The main elements of this quality policy are the development of high quality services aimed at satisfying our customer requirements, the enhancement of operational performance as well as the development of our people.

The Company understands the external and internal issues that may affect the performance of the Company either negatively or positively and understand the needs and expectations of stakeholders. It also understands, evaluates and addresses risks and exploits the opportunities that affect the Company's performance and strengthens leadership and commitment to quality management. Through this analysis, the Company develops its strategic direction and sets the framework for its Quality Objectives.

The Company is committed to satisfy the current legal and other requirements. To this effect the Company is implementing a quality management system.

The effectiveness of our services and customer satisfaction is monitored through our own customer questionnaires, through our operator's feedback and management/ staff meetings and reviews.

All senior and other employees have been made aware of our operational objectives targets and practicing standards applicable to this quality policy. All of them have been informed of this quality policy, procedures and instructions defined within.

To ensure that all Company's procedures and instructions operate effectively we undertake planned internal audits as defined within the Quality Management System (QMS).

This Quality Management System assures that services are provided as defined in the documented working procedures, instructions and to make sure they work every time and with everybody.

The Quality Management System implemented by Iron Mountain satisfies the requirements defined by the ISO 9001:2015 Quality System standard. This system enhances the continuous improvement and effectiveness of the Company and promotes the achievement of the objectives and targets, set by the Top Management.

This policy is reviewed periodically to ensure that is relevant to and in compliance with the activities of the Company and it is made available to relevant interested parties.

The objectives are reviewed during structured management reviews at least once a year in order to ensure their continuing suitability.

Every employee is fully aware of this Quality Policy and adopt its purpose and objectives.

2 Health and Safety Policy

Iron Mountain has a policy of actively promoting Occupational Health & Safety at work, which requires and encourages the cooperation of all its employees. The Company provides a suitable working environment which is in compliance with all relevant codes of practice applicable for ensuring appropriate standards of Health & Safety for our employees, customers and public. It is the Company's duty to ensure, as far as practicable, that the occupational Health, Safety and welfare of employees, customers and public is ensured along with the continuous improvement and effectiveness of the Company and promotes the achievement of the objectives and targets. The following statement of principles and intentions comprise the Health and Safety Policy of Iron Mountain.

Principles

- The provision and maintenance of work systems that are safe and do not present a risk to employees', customers and visitors health & safety.
- Offer the customers, employees and visitors a safe environment within the hotel premises
- The provision of safe access to, from and within the building.
- Ensuring that external contractors and other people on the premises are also provided with a safe working environment and that services and products that are used by the Company adhere to all necessary Health & Safety policies of the Company.
- Complying with all relevant laws and regulations and following best practices.
- Commitment to provide all necessary means to implement the Health and Safety Policy.
- Continual Improvement of Occupational Health & Safety.

Intentions

- Minimization of occupational accidents and improvements in regards to the safety of premises and work methods.
- To understand external and internal issues that may negatively or positively affect the healthy and safe working conditions of the Company
- To understand the needs and expectation of the stakeholders
- To understand, evaluate and address threats and exploit the opportunities that affect the healthy and safe working conditions of the Company
- Continually identifying, evaluating and controlling all risks associated with the Company's activities and implement suitable proactive measures.
- To set and review health and safety objectives and targets and implement a management program in order to minimize risks.
- Making information, instruction, training and supervision available as necessary, to ensure the occupational Health & Safety of all employees.
- To ensure that all employees are trained in occupational health and safety.
- To ensure that all employees are aware of their individual responsibilities reference to the Company's health and safety policy and procedures.
- To communicate to our employees, clients and suppliers our health and safety policy.
- To carry out occupational health and safety risk assessments as necessary.
- To inform our customers, contractors, subcontractors and suppliers about our Health and Safety Policy. To make the Company's health and safety policy available to the public.
- To review the Company's health and safety policy periodically.
- The Management is responsible to ensure that the Health and Safety Policy is understood and implemented by all personnel at all levels and complies with the hotel's business objectives.

3 Environmental Policy

The policies and procedures documented constitute the general management direction and control of Iron Mountain for the environmental aspects (energy and fuel consumption, resources and waste management) which can be controlled and over which it can be expected to have an influence. The Environmental management System of Iron Mountain addresses the requirements of EN ISO 14001:201 and the need for continuous improvement and effectiveness of the Company. The following statement of principles and intentions comprise the Environmental Policy of Iron Mountain.

Principles

- We are committed to minimizing the impact of our operations on the environment
- We are committed to comply with all relevant environmental legislation and regulations and with other requirements to which the Company subscribes.
- We are committed to protect the environment through continual improvement of our environmental. All our businesses take into account the effects that our activities have on the environment
- To incorporate in our strategies, policies and practices, measures aiming on the improvement of environmental performance as well as on the minimization of CO2 emissions

Intentions

- To understand external and internal issues that may negatively or positively affect the environmental performance of the Company
- To understand the needs and expectation of the stakeholders
- To understand, evaluate and address threats and exploit the opportunities that affect the environmental performance of the Company
- To strengthen and commit leadership to environmental management
- To understand the environmental issues associated with our activities.
- To minimize the amount of wastes we dispose of, seek to recover through re-use or recycling as much as is economically practicable and ensure that the remainder is disposed properly.
- To minimize the use of water through monitoring and increasing the efficiency of use and purchase environmental sound products and services wherever possible, while upholding the highest standards of our services provision
- To ensure that all employees are aware of their individual responsibilities for acting in accordance with the policy.
- To set and review environmental objectives and targets and to implement an action plan, addressing waste reduction, fuel reduction, raw materials consumption and environmental evaluation. The Company will release the necessary resources to achieve these objectives using the best available practices, which do not entail excessive cost.
- To communicate to our employees, customers and suppliers our policy and achievements in improving our environmental performance.
- To incorporate environmental management into everyday business practice.
- To encourage environmentally friendly, and where possible, local sourcing of products and services.
- To encourage engagement of our business with local communities.
- This policy is reviewed so it is relevant and suitable to the Company's activities.

4 Information Security Policy

Iron Mountain Cyprus Ltd is committed to protecting its information and that of its customers. To achieve this goal, the company has implemented an Information Security Management System in accordance with ISO/IEC 27001: 2013.

Principles

The company's ISMS is applicable to the following areas of the business:

- Records Management Services including secure storage and retrieval
- Environmentally controlled storage of magnetic media
- Imaging, data capturing and document management solutions
- Confidential document destruction service and
- Records & information management consulting.

Intentions

It is the policy of our company to ensure:

- Information is only accessible to authorized persons from within or outside the company.
- Confidentiality of information is maintained.
- Integrity of information is maintained throughout the process.
- Business continuity plans are established, maintained, and tested.
- All personnel are trained on information security and are informed that compliance with the policy is mandatory.
- All breaches of information security and suspected weaknesses are reported and investigated.
- Procedures exist to support the policy, including virus control measures, passwords, and continuity plans.
- Business requirements for availability of information and systems will be met.
- The Information Security Officer is responsible for maintaining the policy and providing support and advice during its implementation.
- All managers are directly responsible for implementing the policy and ensuring staff compliance in their respective departments.
- Third parties who share responsibility for information security are responsible for accepting and implementing the information security requirements set by the Organization.
- This policy is reviewed so it is relevant and suitable to the Company's activities.
- The continuous improvement and effectiveness of the Company and promotes the achievement of the objectives and targets

5 Business Continuity Policy

Iron Mountain Cyprus Ltd adopts Iron Mountain Incorporated business continuity policy, procedures and respective emergency recovery plans, which apply to all its Global locations which are part of the Iron Mountain service system, and other entities which directly or indirectly are controlled by Iron Mountain.

Principles

The company's BCP is applicable to all business applications including internal and external operations, existing and future hardware and software as well as all assets needed for the uninterrupted delivery of our services. Services include:

- Records Management Services including secure storage and retrieval
- Environmentally controlled storage of magnetic media
- Imaging, data capturing and document management solutions
- Confidential document destruction service and
- Records & information management consulting.

Intentions

Our Business continuity plan focuses on an extended array of events which may affect the smooth running of daily operations, such as natural disasters, fires and floods but also has to take into account the impact of humans into disturbing ongoing activities. To meet the requirements for our successful implementation of our global BCP program, the following principles are adhered to:

- Get employees involved via training and communication of the Business Continuity plans on a regular basis and actively solicit employee input.
- Keep customers aware of actual events as well as potential updates, upholding transparency and joint efforts to act as the business continuity provider for records and information management.
- Collaborate with suppliers and other third parties which can be crucial for the success of our BCP through their contribution.
- Periodically test and update Business Continuity plans and allow for accommodation of changes in the business's products, services, relationships, size, geographic reach, etc.
- Factor in compliance to enable quality continuity, privacy, information security and workplace safety during a business continuity event
- Enable insurance feedback for full potential coverage in case of event.
- the continuous improvement and effectiveness of the Company and promotes the achievement of the objectives and targets

6 Privacy Policy

Iron Mountain Cyprus Ltd adopts Iron Mountain Incorporated privacy policy, which applies to all its European subsidiaries and joint venture partners which are part of the Iron Mountain service system, and other entities which directly or indirectly are controlled by Iron Mountain.

Principles

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). It also addresses the export of personal data outside the EU and EEA areas. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

Iron Mountain understands Client, Data Subject and Employee concerns about the privacy of data which is provided to the Company, to a third party representative acting on the Company's behalf or information and personal data which is obtained through the use of the Iron Mountain Websites or the services provided to our prospective customers, current customers, employees, partners, suppliers and other parties. This policy is not intended to override the terms of any contractual obligation, nor any rights which may arise under applicable data protection laws.

Intentions

It is the policy of Iron Mountain (IRM) to ensure that all stakeholders and interested parties, understand and are aware the process on topics such as:

- who IRM collects information from and the information we collect
- how IRM uses the information we collect
- how IRM uses cookies and other tracking technologies
- who IRM discloses various types of information to
- the policy and controls on international transfers
- how IRM protects and stores all information
- the retention of data subject personal information
- how this notice applies third-parties
- data subject rights and how an individual can opt out or request changes to their personal information
- how IRM notifies the interested parties on changes to this privacy policy
- how any of the interested parties can contact us

This policy is reviewed so it is relevant and suitable to the Company's activities with the intention to also enhance the continuous improvement and effectiveness of the Company and the achievement of the Company objectives and targets