

Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

June 2018



INDEPENDENT ASSESSOR'S REPORT

To the Management of Iron Mountain Information Management, Inc.

We have examined Iron Mountain Information Management, Inc.'s (IRM) compliance with PCI Data Security Standard (PCI-DSS) v3.2.1 requirements for their records management, data management, and secure destruction services for the European region as of January 22, 2021. Management of IRM is responsible for IRM's compliance with the specified requirements. Our responsibility is to express an opinion on IRM's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether IRM complied, in all material respects, with the specified requirements referenced above. An examination involves performing procedures to obtain evidence about whether IRM complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination does not provide a legal determination on IRM's compliance with specified requirements.

In our opinion, Iron Mountain Information Management, Inc. complied, in all material respects, with PCI Data Security Standard (PCI-DSS) v3.2.1 requirements as of January 22, 2021.

This report is intended solely for the information and use of the management of IRM, IRM customers, and the card brands and is not intended to be and should not be used by anyone other than the specified parties.

Crowe LLP

ROWE LLP

Atlanta, GA March 10, 2021



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS)*. Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

Part 1. Service Provider and Qualified Security Assessor Information							
Part 1a. Service Provider	Organization Infor	mation					
Company Name:	Iron Mountain Info Management, Inc.		DBA (doing business as):	Iron Mountain			
Contact Name:	David Brintworth		Title:	Information Security Governance Manager			
Telephone:	+44 (0) 207 939 1	587	E-mail:	dbrintword co.uk	th@iro	nmountain.	
Business Address:	Ground Floor, 4 More London Riverside		City:	London			
State/Province:	Country:		England		Zip:	SE1 2AU	
URL:	www.ironmountaii	www.ironmountain.com					

Part 1b. Qualified Security Assessor Company Information (if applicable)						
Company Name:	Crowe LLP					
Lead QSA Contact Name:	Angie Hipsher-Wi	lliams	Title:	Principal (F	Principal (Partner)	
Telephone:	(317) 208-2430		E-mail:	angie.hips	angie.hipsher@crowe.com	
Business Address:	3815 River Crossi Suite 300	ing Pkwy	City:	Indianapol	is	
State/Province:	Indiana Country:		USA		Zip:	46240
URL:	www.crowe.com					



Part 2. Executive Summary	1							
Part 2a. Scope Verification								
Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply):								
Name of service(s) assessed:	Name of service(s) assessed: Records management, data management, and secure destruction							
Type of service(s) assessed:								
Hosting Provider:	Managed Services (specify):	Payment Processing:						
☐ Applications / software	☐ Systems security services	☐ POS / card present						
Hardware	☐ IT support	☐ Internet / e-commerce						
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center						
☐ Physical space (co-location)	☐ Terminal Management System	☐ ATM						
☐ Storage	☐ Other services (specify):	Other processing (specify):						
□ Web								
☐ Security services								
☐ 3-D Secure Hosting Provider								
☐ Shared Hosting Provider								
Other Hosting (specify):								
Account Management	☐ Fraud and Chargeback	☐ Payment Gateway/Switch						
☐ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services						
☐ Billing Management	☐ Loyalty Programs	☐ Records Management						
☐ Clearing and Settlement	☐ Merchant Services	☐ Tax/Government Payments						
☐ Network Provider								
☑ Others (specify): Paper Destruction and Media Vaulting								
Note: These categories are provided for assistance only, and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.								



Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (check all that apply): Name of service(s) not assessed: Iron Mountain provides other services such as electronic hosting, colocation and others not included in this assessment. Type of service(s) not assessed: **Hosting Provider:** Managed Services (specify): **Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POS / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network MOTO / Call Center ☐ Physical security □ Physical space (co-location) ☐ Terminal Management System Other services (specify): Other processing (specify): ⊠ Web ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Shared Hosting Provider Other Hosting (specify): ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Account Management ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ Merchant Services ☐ Tax/Government Payments ☐ Network Provider Others (specify): Provide a brief explanation why any checked services Iron Mountain has a separate report to cover were not included in the assessment: additional services not covered by this AOC. Part 2b. Description of Payment Card Business Describe how and in what capacity your business Iron Mountain is a records and information stores, processes, and/or transmits cardholder data. management service provider that does not process or transmit any card data, and storage of card data is limited to physical storage or storage on removable electronic media. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain's clients may potentially contain cardholder data.



Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

See detail above.

Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

summary of locations inc Type of fac			of facilities	Location(s) of	f facility (city, country):	
Type of fac	ility.		is type	Location(s) of facility (oity, country).		
Example: Retail outlets			3		SA .	
Data Management Loca	19		Facilities located in the following countries: France, Germany, Great Britain, Ireland, Spain, Sweeden			
Records Management L	223	223		Facilities located in the following countries: Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Grea Britain, Greece, Hungary, Ireland, Lithuania, Netherlands, Norway, Poland, Romania, Serbia, Slovakia, Spain, Sweden, Switzerland, Turkey		
Secure Destruction Loc	3			d in the following n Republic, Poland, Spain		
Part 2d. Payment Ap	-					
Does the organization us	se one or more	Payment Applic	cations? L	Yes 🛛 No		
Provide the following info	rmation regard	ing the Paymer	nt Applicatio	ns your organiza	tion uses:	
Payment Application Name	Version Number	Applicatio Vendor		s application A-DSS Listed?	PA-DSS Listing Expiry date (if applicable)	
				Yes 🗌 No		
				Yes 🗌 No		
				Yes 🗌 No		
				Yes No		
				Yes No		
				Yes No		
				Yes No		
	1			1	1	

☐ Yes ☐ No

Part 2e. Description of Environment



Provide a <u>high-level</u> description of the environment covered by this assessment.

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.

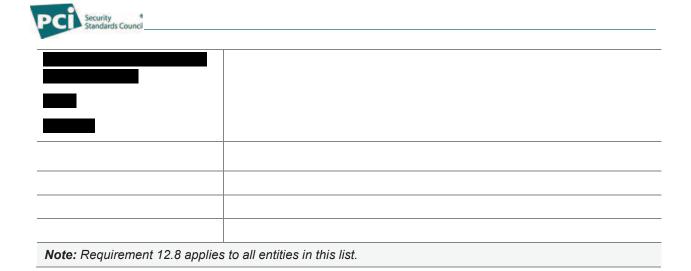
This assessment focused on Iron Mountain's records management, tape vaulting and secure destruction services in Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Great Britain, Greece, Hungary, Ireland, Lithuania, Netherlands, Norway, Poland, Romania, Serbia, Slovakia, Spain, Sweden, Switzerland, and Turkey. Iron Mountain is a media storage and paper shredding service provider. Crowe noted there are no computer systems, processor connections, or networks in scope for this assessment. Iron Mountain does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain may potentially contain cardholder data.

Iron Mountain also operates in the following countries which are not included within the scope of this assessment: Croatia and Latvia

Does your business use network segmentation to affect the scope of your PCI DSS environment?	☐ Yes	⊠ No
(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)		



Part 2f. Third-Party Service Providers							
Does your company have a rela	Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated? ☐ Yes ☐ No						
If Yes:	If Yes:						
Name of QIR Company:		N/A					
QIR Individual Name:		N/A					
Description of services provided	d by QIR:	N/A					
example, Qualified Integrator Re	esellers (QIR), g osting companie	e or more third-party service providers (for ateways, payment processors, payment s, airline booking agents, loyalty program ng validated?	⊠ Yes	□No			
If Yes:							
Name of service provider:	Description o	f services provided:					
	Transportation						
	Paper Shreddir	ng					
С							





Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as "Not Tested" or "Not Applicable" in the ROC.
- Partial One or more sub-requirements of that requirement were marked as "Not Tested" or "Not Applicable" in the ROC.
- **None** All sub-requirements of that requirement were marked as "Not Tested" and/or "Not Applicable" in the ROC.

For all requirements identified as either "Partial" or "None," provide details in the "Justification for Approach" column, including:

- Details of specific sub-requirements that were marked as either "Not Tested" and/or "Not Applicable" in the ROC
- Reason why sub-requirement(s) were not tested or not applicable

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed:		Document management, data management, and secure destruction				
		Details of Requirements Assessed				
PCI DSS Requirement	Full	Partial	None	Justification for Approach (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)		
Requirement 1:				Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.		
Requirement 2:				Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets		



		managed by Iron Mountain client may potentially contain cardholder data.
Requirement 3:		All Requirements except 3.2.1 - 3.2.3 - N/A - Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 4:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physica storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 5:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physica storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 6:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical

Security Standards Council		
		storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 7:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 8:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 9:		9.9 – N/A - IRM does not perform card-present transactions or provide scanning devices to customers.
Requirement 10:		All Requirements except 10.8 - N/A - Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the

assets contain, nor does it maintain payment processing devices. However, assets managed by



		Iron Mountain client may potentially contain cardholder data.
Requirement 11:		Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Requirement 12:		12.3 - N/A - Iron Mountain is a media storage and paper shredding service provider that does not process or transmit any card data, and storage of card data is limited to physical storage. Iron Mountain handles customer assets including boxes of material, files of hardcopy paper records and tape media for physical storage and separately provides secure destruction services. Iron Mountain does not access, process, transmit electronically, or otherwise interact with the data the assets contain, nor does it maintain payment processing devices. However, assets managed by Iron Mountain client may potentially contain cardholder data.
Appendix A1:		A1 – N/A as IRM is not a Shared Hosting Provider.
Appendix A2:		A2 – N/A as IRM does not deploy POS POI.



Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

The assessment documented in this attestation and in the ROC was completed on:	January 22, 2	2021
Have compensating controls been used to meet any requirement in the ROC?	☐ Yes	⊠ No
Were any requirements in the ROC identified as being not applicable (N/A)?	⊠ Yes	☐ No
Were any requirements not tested?	☐ Yes	⊠ No
Were any requirements in the ROC unable to be met due to a legal constraint?	☐ Yes	⊠ No



Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated January 22, 2021.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (check one):

Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby Iron Mountain Information Management, Inc. has demonstrated full compliance with the PCI DSS.							
Non-Compliant: Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby (Service Provider Company Name) has not demonstrated full compliance with the PCI DSS.							
Target Date for Compliance:							
An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. Check with the payment brand(s) before completing Part 4.							
Compliant but with Legal exception: One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand. If checked, complete the following:							
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status Signatory(s) confirms: (Check all that apply) \boxtimes The ROC was completed according to the PCI DSS Requirements and Security Assessment *Procedures*, Version 3.2.1, and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects. I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization. \boxtimes I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times. \boxtimes If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.



Part	3a. Acknowledgement of Status (co	ontinued)						
	No evidence of full track data ¹ , CAV2, CVC2, CID, or CVV2 data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment.							
	ASV scans are being completed by the PCI SSC Approved Scanning Vendor							
Part	3b. Service Provider Attestation		erched 37 - Smile Auto					
	· W							
Signature of Service Provider Executive Officer ↑			Date: March 10, 2021					
Ser	vice Provider Executive Officer Name: A	ndrás Szakonyi	Title: SVP EMEA, Iron Mountain					
lf a (3c. Qualified Security Assessor (Q OSA was involved or assisted with this essment, describe the role performed:	QSA performed independent testing of PCI DSS version 3.2.1 requirements. See also Independent Assessor's						
	Angelo Hipsha- Williams	Report.						
Sigr	nature of Duly Authorized Officer of QSA	Company ↑	Date: March 10, 2021					
Dul	y Authorized Officer Name: Angle Hipsh	er-Williams	QSA Company: Crowe LLP					
Part	: 3d. Internal Security Assessor (ISA) Involvement (if	applicable)					
this a	ISA(s) was involved or assisted with assessment, identify the ISA personnel describe the role performed:	Not Applicable						

Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

² The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

³ Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.



Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement. If you answer "No" to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

PCI DSS Requirement	Description of Requirement	Compliant to PCI DSS Requirements (Select One)		Remediation Date and Actions (If "NO" selected for any
		YES	NO	Requirement)
1	Install and maintain a firewall configuration to protect cardholder data			
2	Do not use vendor-supplied defaults for system passwords and other security parameters			
3	Protect stored cardholder data			
4	Encrypt transmission of cardholder data across open, public networks	\boxtimes		
5	Protect all systems against malware and regularly update anti-virus software or programs			
6	Develop and maintain secure systems and applications			
7	Restrict access to cardholder data by business need to know			
8	Identify and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Track and monitor all access to network resources and cardholder data			
11	Regularly test security systems and processes			
12	Maintain a policy that addresses information security for all personnel			
Appendix A1	Additional PCI DSS Requirements for Shared Hosting Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections			









