Iron Mountain
Data Privacy Framework (DPF) Statement

Commitment to comply with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF

Iron Mountain complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Iron Mountain has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Iron Mountain has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the UK Extension to the EU-U.S. DPF and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

What Iron Mountain U.S. entities or subsidiaries adhere to the DPF Principles?

Iron Mountain Data Centers, LLC; Iron Mountain Incorporated; Iron Mountain Information Management Services, Inc.; Iron Mountain Secure Shredding, Inc.; Iron Mountain Information Management, LLC; ITRenew Inc.; RSR Partners LLC; Iron Mountain Receivables QRS, LLC; Iron Mountain Receivables TRS, LLC; Iron Mountain International Holdings (U.S.) LLC; Premier Surplus Inc.; Wisetek Solutions LLC; Iron Mountain Data Centers Chicago, LLC; Iron Mountain Data Centers Arizona 4, LLC; Iron Mountain Data Centers Virginia 3, LLC; Iron Mountain Data Centers Virginia 6, LLC; Iron Mountain Data Centers Virginia 7, LLC; Iron Mountain Data Centers Virginia 9, LLC.

How to contact Iron Mountain with inquiries or complaints?

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Iron Mountain commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Iron Mountain at: global.privacy@ironmountain.com.

Is Iron Mountain subject to the investigatory or enforcement powers of the Federal Trade Commission (FTC)?

Yes. The FTC has jurisdiction over Iron Mountain's compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

Independent Recourse Mechanism
In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Iron Mountain commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

Does an individual have the possibility to invoke binding arbitration?
Yes. An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Additional information is available here.

Is Iron Mountain liable in case of onward transfers to third parties?
Yes. Iron Mountains takes responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. Iron Mountain remains liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless Iron Mountain proves that it is not responsible for the event giving rise to the damage.

Where can I find more information?
For full information on our data handling practices, please consult our main Privacy Notice. It provides details on the following key areas:

- Data Processing and Sharing: The purposes for which we process personal data, the types of third parties to whom we disclose it, and our requirement to respond to lawful requests by public authorities are explained in the "How we use your personal data" and "How we share your personal data" sections.

- Individual Rights and Choices: Your right to access your personal data, along with the choices and means for limiting its use and disclosure, are covered in the "Data subject/consumer rights: how to access and control your personal data" section.