



COMPLIANCE

Showing the Way



Iron Mountain Customers
Share Compliance, Litigation
and Discovery Best Practices

MANAGE INFORMATION FOR COMPLIANCE AND STREAMLINE DISCOVERY

Companies today are creating and storing more documents, in more formats, than ever before. Knowing what your physical and electronic assets are, and where they can be found, is critical – and never more so than when confronted with the prospect of discovery. By combining practical advice with advanced technology, we help customers create defensible programs that meet even their most formidable legal, regulatory and compliance obligations.

As the volume of organizational records and documents grow, so do organizations' dependence on this information to simultaneously serve a variety of needs. In the meantime, regulations are continually evolving to ensure information is appropriately managed throughout the lifecycle, even going so far as defining what that lifecycle should be.

That's because physical and electronic information can represent risk. Effectively minimizing risk as it relates to compliance means bridging the information continuum – from creation through destruction.

While aligning information management processes with compliance guidelines can certainly be challenging, many organizations have demonstrated success. This guide showcases the various ways that Iron Mountain customers address their own compliance and discovery requirements by leveraging our intellectual property, practical advice and best practices.

INSTILL COMPLIANCE CONFIDENCE

With expertise developed over decades of experience in information management workflows and business processes across industries, Iron Mountain helps customers tackle legal, security and privacy risks via unique and comprehensive solutions. Our solutions and services help companies identify and destroy irrelevant information while preserving the records needed for regulatory compliance.

More to the point, we help customers **know what they have so they can find it faster, use it more efficiently and, ultimately, realize greater value from it.** These companies run the gamut in terms of size, sector and requirements. And, they have improved their compliance postures with the help of solutions that enforce corporate governance and increase end-to-end transparency of physical and digital information.

THE STATISTICS TELL THE STORY

Iron Mountain's comprehensive information management solutions are supported by the practical advice and best practices that enable us to serve as a trusted provider for more than 140,000 organizations.

It's the statistics that tell the story best. Our services help thousands of organizations protect, recover and access:

- 425 million cubic feet of paper records
- 65 million backup tapes
- 10 billion emails
- 2.5 million PCs
- 20,000 servers
- 29.5 TB of stored images

What's more, we help customers bridge the paper-to-pixels divide by scanning over **50 million images per month**. We have protected these and other vital records throughout our history, including **support for 2,372 disaster events and 43,235 disaster recovery tests**. And, when it comes to secure, compliant destruction, we have the bandwidth and global reach to conduct over **8 million shredding engagements each year**.

Practical Advice

- 60 years of domain expertise embedded in our people, processes and technology
- World's largest Records Management Consulting practice

Comprehensive Solutions

- Data Protection and Recovery
- Records Management
- Information Destruction

Trusted Provider

- Serving more than 140,000 customers in virtually every industry
- Unmatched resources for responding to client needs
- Focused on reducing costs and risks to increase compliance and efficiency

USANA Health Sciences, Inc.

CUSTOMER CHALLENGE

USANA Health Sciences, Inc., a manufacturer of high-quality personal care and weight management products, needed a more effective, secure and compliant method of categorizing records and defining retention requirements.

IRON MOUNTAIN SOLUTION

Iron Mountain conducted a formal compliance risk assessment and helped USANA build policies and procedures, including a records retention schedule.

BENEFITS

By establishing consistent policies and leveraging records management best practices, USANA was able to improve audit readiness, compliance and efficiencies.

A worldwide leader in the health and nutrition field, USANA markets its products through a vast network of independently contracted distributors. As such, the company must comply with a host of regulations, including Sarbanes-Oxley and those outlined by the US Food and Drug Administration (FDA). Although USANA diligently saved all of its records, the company did not categorize or differentiate retention requirements for each document type, which made records difficult to locate and presented potential non-compliance risks.

To mitigate these risks and strengthen its compliance posture, USANA enlisted the help of Iron Mountain. Working closely with the team at USANA, we performed an assessment that evaluated 25 potential risk areas and provided guidance for developing a formal records management program. Based on an analysis of the assessment results, we developed a customized retention schedule and an offsite storage program specific to the needs of the health industry and public auditing regulations – both of which help USANA streamline the process of determining how long to keep paper and electronic documents.

In addition, we helped USANA create a broader records classification system that limits the number of document categories the company has to manage, leading to a more efficient and user-friendly system.

With its compliant records management program in place, USANA alleviated the drain on internal resources, including staffing and the physical space required to maintain a proper storage solution. In addition, storing and managing records offsite in accordance with our established best practices has helped USANA strengthen its compliance standing and improve the security of valuable information.

"Until Iron Mountain presented the findings of its assessment, nobody at USANA really understood the nature and extent of our exposure. With that event, Iron Mountain transformed the relationship from a storage supplier to a true records management partner."

– Kevin McMurray, Assistant General Counsel, USANA Health Services, Inc.

An Academic Research Center

CUSTOMER CHALLENGE

One of the world's premier centers for the study of alcohol and substance abuse wanted to safeguard the information residing in its laboratory notebooks – vital records containing key research data – without limiting the data's availability to the scientific community.

IRON MOUNTAIN SOLUTION

Knowing that it needed to ensure the ongoing recoverability and availability of these documents, the research center looked to Iron Mountain to provide a secure imaging program that preserved the notebooks while maintaining easy access.

We delivered a solution that converted the lab notebooks to a digital format for high availability and created additional offsite copies for disaster recovery purposes.

BENEFITS

With our help, the research center was able to preserve the content of notebooks via high-quality images, protect information integrity during the imaging process through a tight chain-of-custody and ensure the long-term preservation of these important documents – all while assuming a lower overall risk profile.

A Major US Professional Sports League

CUSTOMER CHALLENGE

A national sports organization was faced with the challenge of managing large volumes of confidential paper and electronic contracts across multiple departments – and enabling approximately 100 employees to manage emails as records from their desktops.

IRON MOUNTAIN SOLUTION

Iron Mountain proposed a solution whereby the sports organization would upgrade to the latest version of Iron Mountain Accutrac® Software, featuring a new web interface that streamlined

access to records across the user base. In addition, Accutrac Software includes an imaging integration that provides a unified interface from which to manage digitized paper and electronic records.

BENEFITS

By implementing Accutrac Software, the sports organization was able to better manage large volumes of contracts, regardless of format or location, enabling it to more effectively address compliance-driven requirements for legal holds and helping it improve overall business processes.

Kennecott Utah Copper Corporation

CUSTOMER CHALLENGE

Kennecott Utah Copper Corporation, the second largest copper producer in the United States, was seeking a way to exact greater control over an unwieldy volume of paper records dating back more than a century.

IRON MOUNTAIN SOLUTION

Kennecott evaluated three potential partners and chose to work with Iron Mountain after we demonstrated a deep understanding of its business issues and the ability to apply a systematic, strategic approach to managing records and information. We helped Kennecott evaluate current processes as they relate to federal and

state retention regulations, develop a formal retention schedule and document policies and procedures with clear definitions of employee roles and responsibilities. In addition, we provided recommendations for the creation, management, access, retention and disposal of company information.

BENEFITS

By adopting information management best practices, Kennecott is better positioned to proactively address compliance, litigation and risk management concerns – and poised to confidently comply with evolving regulations.

A Hospital Based in the United States

CUSTOMER CHALLENGE

In order to address an urgent internal litigation issue, the chief privacy officer of a US-based hospital needed to quickly image roughly 1,800 patient files – each of which contained approximately 125 pages – in 10 business days.

IRON MOUNTAIN SOLUTION

Within eight days, the Iron Mountain team had not only assessed the client's needs, but also completed the entire imaging process and

placed all converted records onto four DVD sets – and delivered it all to the hospital before the deadline.

BENEFITS

With Iron Mountain's help, the hospital was able to avoid penalties and provide the necessary documents for this particular litigation request by obtaining the proper electronic records and delivering them ahead of schedule.

"Iron Mountain's expertise and methodology not only impacted our information team, but equally impressed and eased the minds of Kennecott's legal department. Their systematic approach enabled us to set the groundwork to proactively address increasing regulatory controls."

– Kristine Truscott, Senior Records Coordinator, Kennecott Utah Copper Corporation

Hovnanian Enterprises, Inc.

CUSTOMER CHALLENGE

Following a period of break-neck growth, Hovnanian Enterprises, Inc., one of the country's largest homebuilding companies, sought to reduce risk by injecting more consistency into its records management program.

IRON MOUNTAIN SOLUTION

Hovnanian chose to work with Iron Mountain based on our ability to deliver a single, comprehensive records management program for sites across the country. We researched the company's current processes, interviewed stakeholders to determine pertinent legal and operational requirements and leveraged these insights to develop a formal records

management program and retention schedule. In addition, we created an intranet site that integrates with the Iron Mountain Connect™ web portal, enabling company associates to search for record codes, run retention reports and learn about policies and procedures.

BENEFITS

Through a consistent, enterprise-wide approach that extends records management best practices to the employee, legal and corporate levels, Hovnanian was able to properly code its existing records – improving compliance and giving the legal department the assurance that any record can be quickly accessed whenever needed.

"Compliant records management is no longer something I worry about, and that's a very good thing."

– Peter Reinhart, Senior Vice President, General Counsel, Hovnanian Enterprises, Inc.

A Global Technology Leader

CUSTOMER CHALLENGE

With its contracts and agreements created and stored in 20-plus locations worldwide using cumbersome manual processes, a global technology firm needed a means of accessing contracts in a timely manner to better support business initiatives, compliance requirements and legal actions.

IRON MOUNTAIN SOLUTION

Iron Mountain helped create an end-to-end solution for capturing, managing and providing secure, distributed access to contracts and agreements. The solution included a one-time digital conversion

of more than 30,000 paper records and the development of a workflow for scanning and indexing 2,500 new records per week. In addition, we provided a robust image archive for easy search and retrieval, and supplied offsite storage at one of our secure facilities.

BENEFITS

The Iron Mountain solution facilitates the timely destruction of paper and electronic records – in keeping with the customer's retention schedule – enhancing compliance while reducing exposure to discovery and litigation risks.



MITIGATE RISK FOR BETTER COMPLIANCE AND DISCOVERY



With trillions of paper documents circulating throughout businesses in the United States, it's only natural that a significant percentage will be lost or misfiled.

Each time this happens, companies not only face steep financial penalties, they also incur high levels of organizational risk that can result in significant legal repercussions and cause irreparable damage to brand reputation and customer relationships.

And yet, with such a large percentage of corporate memory continuing to reside on paper, it looks as though organizations will be contending with the legal, regulatory and compliance risks associated with lost or damaged physical records well into the future.

Iron Mountain has helped organizations in various industries and locations reduce risk by providing a broad portfolio of document conversion, transport and storage capabilities. We create and implement comprehensive imaging workflows that leverage a best practice-based approach to document preparation, scanning, filing and quality assurance. In addition, our specialty fleet of vehicles transports physical records following a firm, auditable chain-of-custody that ensures optimal levels of safety as documents move from customer sites to one of our facilities and back again. And finally, we build storage facilities with security in mind – providing the confidence that physical records are being housed in a manner that keeps them safe and out of harm's way at all times.

What's more, we take a practical approach to litigation preparedness that delivers the resources you need to manage the request and discovery processes and effectively supply evidentiary data for pending litigation. This helps you contain discovery costs, minimize information volumes and create a legally defensible program that is supported by well-defined, consistently applied policies and procedures.

As our experience shows, the combination of our imaging, transportation, storage and litigation readiness processes and best practices provides organizations with a secure, reliable means of safeguarding documents and reducing their overall risk profiles.

A Sales and Marketing Support Firm

CUSTOMER CHALLENGE

The HR department of a firm that provides targeted market data to organizations across the globe was looking for a way to make the legacy, paper-based personnel files residing in three separate locations more accessible across the business.

IRON MOUNTAIN SOLUTION

Recognizing the need for a partner who could adapt proven information management best practices to its HR department's unique needs, the firm sought the guidance of Iron Mountain. After assessing its unique requirements, we implemented a workflow that

leverages our Backfile Conversion service and Digital Record Center for Images, enabling the firm to create electronic versions of the legacy personnel records and host these in a central repository that is readily available to users in all areas of the organization.

BENEFITS

This new solution has not only helped the firm gain better control over its existing HR documents, it has also provided a streamlined, cost-effective means of making important information available wherever and whenever it is needed.

A Worldwide IT Company

CUSTOMER CHALLENGE

After accumulating volumes of microfiche images of decades-old human resources files, a worldwide IT company realized that the time had come to implement a new model that would digitize these critical records, eliminate the aging equipment needed to view them, provide broader records access and speed responses to increasing human resources requests.

IRON MOUNTAIN SOLUTION

We worked with the IT company to develop a hybrid solution that focused on backfile scanning of only a portion of the microfiche and storing the remaining files in one of our climate-controlled

underground vaults for scanning as business needs dictate. In addition, the solution arranged for the upload of all scanned documents to a digital archive, where they are accessible on demand to employees in the company's human resources and benefits departments.

BENEFITS

After implementing the hybrid solution, the IT company became better positioned to meet the compliance requirements associated with its human resources files, drive efficiencies, quickly respond to requests and provide higher quality service to its employees.

A Nuclear Energy Company

CUSTOMER CHALLENGE

A US-based nuclear energy company was looking to reduce the risks associated with the onsite storage of Design Change Revisions – documents, drawings, photographs, reports and more pertaining to the ongoing design and improvement of the plant.

IRON MOUNTAIN SOLUTION

Leveraging its experience in the nuclear utility industry, Iron Mountain designed an imaging program that included transportation between the company's site and our specialized underground storage facility,

conversion of documents across formats and media and post-scanning document storage at a secure facility.

BENEFITS

By converting its Design Change Revisions, the energy company enhanced the security of its backup media and provided remote access to authorized users. In addition, the company has been able to capture and preserve existing documentation with a reduced footprint, while eliminating the risks associated with storing copies of these vital records onsite.

A Leading Insurance Provider

CUSTOMER CHALLENGE

Facing a class-action lawsuit, a leading insurance provider needed to retrieve more than 400,000 hardcopy claims forms residing in multiple storage facilities, and image them within a 60-day window.

IRON MOUNTAIN SOLUTION

Due to the distributed nature of the records in question – and the lack of standardization with which they were stored – the insurance company enlisted Iron Mountain to guide the retrieval and imaging processes. We

responded with a solution that scanned all 400,000 claims forms – creating a total of over 200 million images – and reboxed the hardcopy records following our proven information management best practices.

BENEFITS

With Iron Mountain's help, the insurance company was able to provide the records needed for the lawsuit before the 60-day deadline, increase process efficiencies, reduce risk and better prepare itself for future litigation and audit events.

A Leading Pharmaceuticals Manufacturer

CUSTOMER CHALLENGE

One of the world's leading pharmaceuticals manufacturers needed a solution that could effectively convert more than 25 million paper-based intellectual property documents into the proper digital format – and deliver the appropriate indexing, tracking and online security capabilities.

IRON MOUNTAIN SOLUTION

Recognizing the critical importance of the company's IP, Iron Mountain implemented a multi-phase solution that managed the full scope of the project. The first step was to create a file-level inventory of all documents by scanning the barcodes

associated with each file and putting everything into storage cartons for shipment to Iron Mountain. Next, we scanned carton- and file-level data into our SafeKeeperPLUS® inventory-control system for greater tracking accuracy. The documents were then prepared, scanned, indexed and uploaded to an image archive and stored in a secure facility.

BENEFITS

In the end, the company achieved centralized control over its important records and improved its safety through encryption and other electronic security methods – helping it reduce the risk that these records could be lost or compromised.

A Major Sporting Goods Retailer

CUSTOMER CHALLENGE

A leading retailer of name-brand sporting goods was involved in a legal discovery project that required some 1,400 cartons containing more than 60,000 employee records to be imaged, indexed and delivered to internal counsel in two weeks.

IRON MOUNTAIN SOLUTION

Recognizing that there could be no delays in preparing this immense volume of records to support litigation efforts, the company turned to Iron Mountain for help. We responded by

leveraging the combined resources of seven of our imaging centers, which worked together to prep, image and index all 60,000 files – and save them to a secure FTP site, burned DVD or external hard drive within the required timeframe.

BENEFITS

With our help, the retailer was able to deliver the records needed to support the litigation event, while avoiding the risks and penalties associated with failing to provide the required information within the prescribed timeframe.

A Global Energy Company

CUSTOMER CHALLENGE

In response to the relocation and consolidation of an office into a smaller space, the treasury department of a global energy company needed a better way of storing and sharing key hardcopy financial documents – without limiting their availability or accessibility.

IRON MOUNTAIN SOLUTION

Sensing the challenges inherent in storing a large amount of existing information in a significantly reduced footprint, the energy company turned to Iron Mountain for

assistance. We responded by developing a solution based on our Backfile Conversion service, which outlined a phased, project-based workflow for the fast, cost-effective bulk conversion of existing physical records.

BENEFITS

With its Backfile Conversion program in place, the energy company was able to maximize the value of its limited storage space, while continuing to provide users in multiple locations with quick and easy access to electronic images of critical documents.

A Worldwide Energy Company

CUSTOMER CHALLENGE

A worldwide energy company was looking to reclaim valuable office space and create a more streamlined means of managing and distributing the contracts it stored onsite, in 40-plus filing cabinets – and improve its ability to locate and deliver documents to satisfy internal requests.

IRON MOUNTAIN SOLUTION

Realizing that it needed faster document retrieval and transport processes, the company asked Iron Mountain to help it create an efficient conversion program for backfile and day-forward scanning.

We worked with the company to devise a plan that managed the onsite packing and categorization of physical records, as well as the shipment, storage and backfile and day-forward scanning of the paper documents at our facility.

BENEFITS

This end-to-end document management solution helped the company improve the overall quality of its records management program, streamline access to important records, accelerate business processes, speed responses to internal requests and focus more attention on core business processes.

60% of employees spend an hour or more duplicating the work of others.



We've helped enterprises evaluate their existing document management environments and related costs and assess their long-term needs.

Iron Mountain's customers are achieving real competitive advantage and big business results via end-to-end, lifecycle-based document management solutions that are customized to address their specific needs and feature:

- **ACTIVE RECORDS MANAGEMENT**, via ActivFile® Solutions, a fully outsourced, active records management program that helps keep costs low by consolidating, organizing and indexing paper documents and archived and on-demand images.
- **INTELLIGENT DOCUMENT CONVERSION**, which significantly reduces document access times, and improves both access and security for such key records as contracts, human resource files and invoices by converting them into electronic form.
- **HOSTED IMAGE ARCHIVING**, via Iron Mountain's high-capacity, high-availability Digital Record Center® for Images, which provides long-term storage and anytime, anywhere access and retrieval of archived documents.
- **RECORDS MANAGEMENT SOFTWARE**, via Accutrac® Software, which centralizes tracking, management and application of policy (including holds) to all records – active and inactive and throughout their entire lifecycles – regardless of location.
- **DOCUMENT WORKFLOW CONSULTING**, which leverages our document management experts to streamline business processes, enhance workflows, improve operations and support overarching business strategies.

Then, we work with them to develop a managed solution that supports their business goals while complementing their strengths and resources.



Iron Mountain's DMS customers are integrating physical and digital records to:

- Improve employee productivity with fast, distributed, simultaneous access to all records, regardless of format
- Protect their business with enforced compliance and disaster recovery strategies
- Save time and money by implementing a solution more quickly and with little or no capital investment



Iron Mountain's Document Management Solutions integrate physical records management, imaging and electronic storage, managing our customers' information throughout their lifecycles. Our solutions make information more accessible and actionable, increase compliance and security and improve workflows and business processes, thereby reducing the total cost of information management to help:

- Improve efficiencies
- Decrease risk
- Reduce costs



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ABOUT IRON MOUNTAIN. Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks and inefficiencies of managing their physical and digital data. Founded in 1951, Iron Mountain manages billions of information assets, including backup and archival data, electronic records, document imaging, business records, secure shredding, and more, for organizations around the world. Visit the company Web site at www.ironmountain.com for more information.

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