

U.S. Federal Trade Commission
**DISPOSAL RULE
COMPLIANCE**



A Vendor Assessment Guide



The FTC's New Disposal Rule: Everyone is Impacted.

More than ever, today's business environment is filled with an overwhelming amount of confidential consumer data, from social security numbers to credit applications; rental agreements, payroll records, background check information and all types of customer records, receipts and miscellaneous credit information. The accidental release of such private information can have serious consequences for individuals, companies and their employees.

As a result, the US federal government enacted the FACTA Disposal Rule on June 1st, 2005. This new regulation establishes your company's legal responsibility to have an information disposal program in place that protects against consumer fraud and identity theft. Failure to do so could expose your company to tremendous liability and public attack.

To become "FACTA-ready", you could enhance your existing information disposal program on your own. Or, as the FTC provides, conduct due diligence and enter into a written contract with a third party destruction vendor to evaluate your current program, or, create a new one.

FTC Criteria For Vendor Due Diligence.

According to the FTC, conducting “due diligence” when selecting your information destruction partner could include one or more of the following:

- reviewing an audit of a disposal company's operations and its compliance with FACTA.
- obtaining information about the company from several references.
- requiring that the disposal company be certified by a recognized trade association or similar third party*.
- monitoring your provider's compliance on an ongoing basis.



How Iron Mountain Exceeds FTC Criteria.

- Publicly held company that conducts its own annual independent audits to ensure Disposal Rule compliance.
- Provides information management services to 70% of the national Fortune 1000 companies. References available upon request.
- SysTrust-certified, recognized as achieving the highest standards for operational excellence.
- Provides comprehensive customer communication tools to educate employees and ensure program success throughout the company.
- Offers written service contracts and monitors your organization's performance against program benchmarks to ensure ongoing compliance.
- Has the most extensive secure shredding and disposal facilities in North America.
- Maintains the highest standards for preserving a consistent chain of custody across all services.

*Iron Mountain is an active member of the National Association for Information Destruction and is currently working with NAID to expand its certification process to apply to wholly owned, national vendors.



Other Key Considerations for Choosing Your Disposal Partner.

With over 50 years of experience in information management, no one understands the challenges a company faces in selecting a secure shredding partner better than Iron Mountain. That's why we believe it is critical — especially for larger organizations — to consider additional criteria when evaluating a potential vendor's ability to service the unique information disposal needs of your company.

SERVICE CAPABILITIES. Shredding vendors range in size from small local companies to multi-dimensional, global corporations. If you are a large, growing or rapidly changing company you should select a vendor with a suitable geographic footprint to fulfill your corporation's current and future needs.

▲ *Iron Mountain is the world's largest information management company.* We service 151 markets worldwide and have an extensive network of state-of-the-art shredding facilities. Whether you're a small start-up or a national or global enterprise with many geographic locations, we can quickly deliver a FACTA-ready program for you and your customers.

BUSINESS STRUCTURE. Assessing a potential partner's business structure is important in understanding service delivery, consistency and accountability at both a local and national level. While a local or franchise operation may integrate well with a company that is decentralized, it lacks the corporate resources necessary to ensure the accountability and financial stability larger corporations require.

▲ *As part of a \$2+ billion company, Iron Mountain can offer your organization:*

- *greater geographic reach.*
- *a standardized, cohesive program across the enterprise.*
- *consistent pricing and delivery of service.*
- *greater financial stability and accountability.*
- *efficient, cost-effective solutions.*
- *critical access to expert personnel.*
- *extensive state-of-the-art equipment and transportation resources.*

CUSTOMER SERVICE AND PROGRAM MANAGEMENT. If a national vendor has a weak local structure, it won't be able to deliver service in a timely manner. Conversely, if it has a weak national structure, it won't be able to provide a uniform program to its largest customers. *Iron Mountain offers you the best of both worlds: a consistent program supported by a national customer response team, delivered by a decentralized service organization with empowered local management.* It's a combination that will provide unmatched responsiveness to your unique needs. ▲

FLEXIBLE SERVICE OPTIONS. The decision to use "off-site" shredding versus "on-site" is a matter of customer preference.

Iron Mountain offers both solutions to provide your company with the most comprehensive shredding program possible. ▲

- Off-site shredding is performed at our secure facilities.
- On-site (witnessed) is performed in our state-of-the-art mobile shredding vehicles.

Iron Mountain's coverage goal is to effectively address customer needs by easily applying a consistent, reliable program across widely dispersed locations.

RELATED BUSINESSES. Evaluating a company's core competency and business concentration is critical to the vendor selection process. For example, a recycling or waste management company primarily engaged in paper recovery will not have the necessary focus, expertise or systematic procedures to ensure compliance with FACTA regulations.

Iron Mountain does. Since 1951, we have been the trusted leader in information management and secure destruction, relied upon by large corporations from many different industries to manage the complete lifecycle of their most confidential information. It's a level of experience and service you can trust to help your company comply with all regulatory requirements in a quick, secure and cost-efficient manner. ▲

The Iron Mountain Program.

No other vendor can offer your company a more comprehensive destruction solution than Iron Mountain. From the moment your data is created to its final disposition in non-recoverable form, we will maintain an unbroken chain of custody compliant with all FTC regulations, and, establish standardized policies to ensure consistency across your entire organization.



INTERNAL PROCEDURES:

- Analyze company needs.
- Develop efficient, cost-effective program.
- Educate employees about the program.
- Implement and roll-out across the company.
- Review policy and procedures and modify if necessary.
- Maintain program.
- Conduct internal audits to identify any “weak links”.
- Provide container verification.



EXTERNAL PROCEDURES:

- Coverage.
- Support.
- Security - maintain an unbroken chain of custody.
- Vendor security processes.
- Contingency planning.



Manage Risk Wisely.

Selecting a partner that does not understand FACTA’s Disposal Rule and the principles of sound information management could expose your company to theft or loss of valuable customer and business assets, irreparable damage to your corporate image, expensive litigation, criminal penalties and court-imposed sanctions.

Choose Iron Mountain’s FACTA-ready secure shredding service and take advantage of our financial stability, knowledge and expertise, and our ability to provide you with the most comprehensive, defensible compliance solution in the industry. The success of our program results from six simple, consistent guidelines:

ORGANIZE. Gain executive level support of the program.

ASSESS. Evaluate existing disposal procedures, define new Disposal Rule requirements and determine actions.

DEVELOP. Create or modify your existing program to ensure your procedures are FACTA-compliant.

IMPLEMENT. Roll out your program company-wide.

MANAGE. Regularly review reports that identify gaps in your plan that could increase risk.

AUDIT. Conduct a formal examination of your FACTA program to remain compliant and ensure accountability.

RISKS OF NON-COMPLIANCE.

- > Irreparable damage to your corporate image.
- > Multi-million dollar fines.
- > Expensive litigation.
- > Court-imposed sanctions.
- > Criminal penalties.

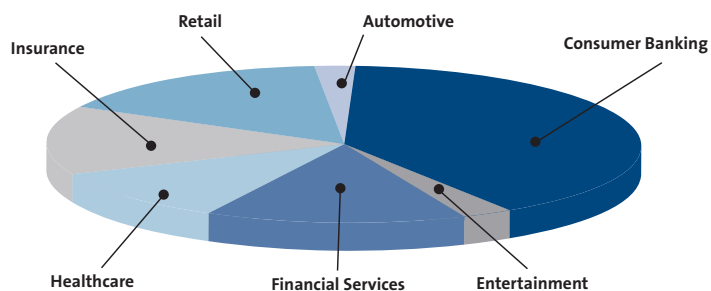
Put the Strength of Iron Mountain to work for you.

As the trusted leader in information management services, Iron Mountain has grown to service more than 235,000 customer accounts throughout the United States, Canada, Europe and Latin America. Our success reflects a longstanding commitment to protect each customer's data as if it were our own. It's one of the reasons we recently received SysTrust certification - your assurance that our systems are reliable and will operate without material errors, faults or failures. It is also why we are the information management vendor of choice for 70% of today's Fortune 1000 companies.

IRON MOUNTAIN: YOUR SINGLE-SOURCE PARTNER.

Iron Mountain is the only company that can provide a complete spectrum of information storage and protection services on a global basis. Our solutions can help your company save money and manage risks associated with regulatory compliance, protection of vital information, and disaster recovery. We can also offer you the unique advantage of consistency - the hallmark of legal credibility in response to regulatory compliance and litigation. Moreover, choosing the leading provider of information storage and protection services can reduce your operating expenses by leveraging Iron Mountain's size, expertise and technology.

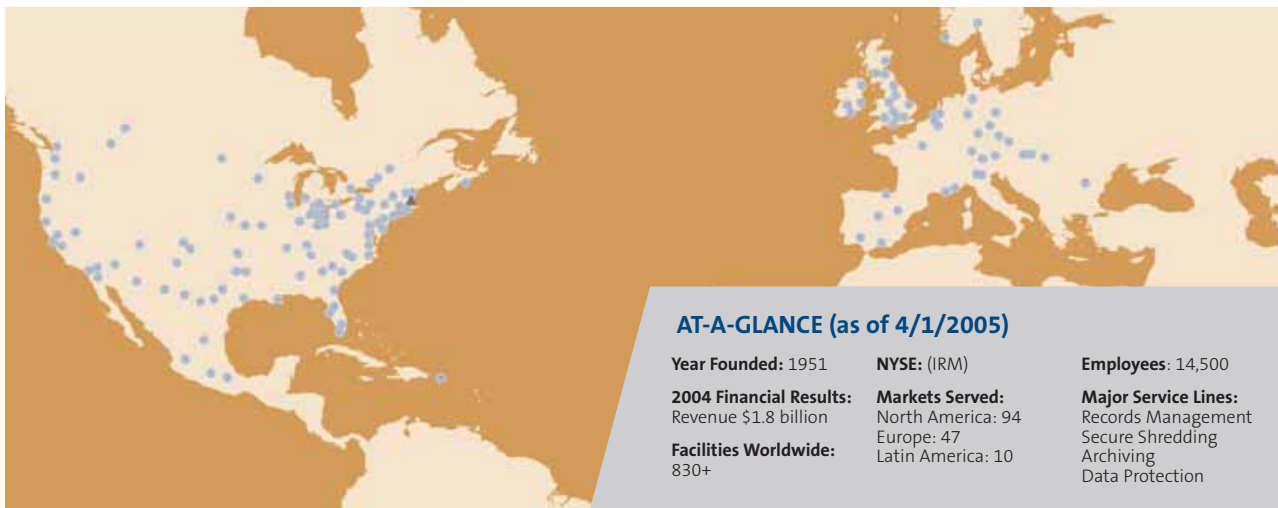
National programs implemented in 2004



SERVICES WE PROVIDE INCLUDE:

- Records Management
- Electronic Vaulting
- Secure Shredding
- Consulting
- Off-Site Media Vaulting
- Digital Archives
- Vital Records
- Film & Sound Archives
- Technology Escrow
- Energy Data Management

If you'd like to learn more about Iron Mountain and the FACTA-ready shredding solutions we can offer your company, please contact your Iron Mountain Account representative at (800-899-IRON) or visit us at www.ironmountain.com.



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Iron Mountain operates in major markets worldwide, serving thousands of customers throughout the U.S., Europe, Canada, and Latin America. For more information, visit our Web site at www.ironmountain.com