



WHITE PAPER

RETENTION ACCELERATOR GUIDEBOOK

ENSURE YOUR RECORDS AND INFORMATION
MANAGEMENT PROGRAMME IS READY TO SUPPORT
DEFENSIBLE DESTRUCTION

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INTRODUCTION

The purpose of this guide is to help you assess the health of one of the key elements of your records and information management (RIM) programme: your records retention schedule. The records retention schedule is foundational to a defensible and actionable records and information management programme.

We'll walk you through how to build, update, and/or assess your records retention schedule, along with its usage, and

provide you with best practice recommendations and tips for its successful implementation in your RIM programme.

An up-to-date and authorised schedule positions you to quickly identify records that have satisfied their retention period and can be defensibly destroyed. And you'll be ready to take the next steps to do it in a cost- and time-effective way, thereby reducing operational costs and risk.

HOW TO USE THE RETENTION SCHEDULE

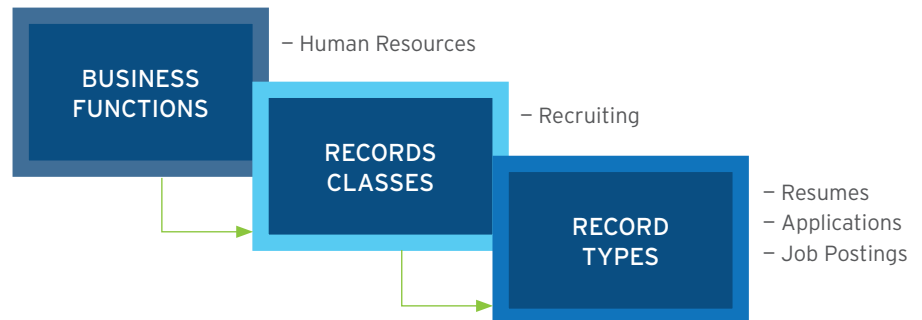
WHAT IS A RETENTION SCHEDULE?

A retention schedule is a policy that specifies how long your organisation's records are to be kept – and by extension when they can be defensibly destroyed. The retention schedule is the cornerstone of your RIM programme and is crucial for risk management. It identifies your records according to function and assigns retention periods for them based on their operational and legal value. Employees at all levels of your business enterprise must use the retention schedule to adhere to federal and state recordkeeping regulations and requirements in order to avoid fines, sanctions, and damage to your reputation.

For maximum efficiency and user-friendliness, the retention schedule is organised in a logical hierarchical format.

RECORDS MANAGEMENT PROGRAMME BEST PRACTICES

HIERARCHIAL CLASSIFICATION SCHEME CONSISTING OF:
Business Functions, Record Classes, and Record Type examples



USING THE RETENTION SCHEDULE

The records retention schedule consists of the following components:

Business Function | This is the broadest classification used to represent a core business function irrespective of departmental ownership, such as legal (you may have contracts in departments other than legal) and human resources (business units may store employee-related records).

Record Classes | Categories, or buckets, of records that relate to the same (or similar) business function or workflow/process and have a common retention requirement. Grouping like records together allows you to apply consistent retention practices to similar records. Classes do not necessarily reflect how records are filed or stored.

Record Class Code | The unique alphanumeric code assigned to the record class. Use of the appropriate record class code is critical when classifying paper and electronic records.

Record Class Description | The description of the business activity during which the records in the class are created, received, and/or maintained. The description includes a sample of typical record types that support the business activity.

Record Types | A listing of representative records that support the business activity described in the record class description. The list of record types may exist in any media or format (paper forms, electronic reports, databases, Word documents, spreadsheets, audiotape, website content, email messages, video, etc.). The record class description can be used as a guide for best fit if the exact record type is not listed in the retention schedule.

Official Retention Period | The period of time an organisation is obligated to keep records based on 1) the retention period stipulated by legal research (including state, province, and federal requirements and considerations, such as statutes of limitation), and 2) the period of time recommended to meet your required business needs as determined by your organisation (this can never be less than the legal stipulation).

Retention Event | This is the date from which the retention period is calculated – in effect, it is the event that starts the countdown for the eventual destruction of the record.

There are two types of retention events, each based on a trigger to begin the retention countdown:

- 1 Time-based retention begins on the date the record is created. The retention event in a records class is so indicated: “The retention period begins on the date the record is created.”
- 2 Event-based retention begins when a triggering event occurs. Examples of triggering events include the expiration of a license, termination of a contract, termination of employment, or the conclusion of the process of opening or closing a store. The retention event in a records class may indicate: “Active for the life of XXX. The retention period begins when XXX is terminated/ concluded.”

MAKING CHANGES TO THE RETENTION SCHEDULE

The retention schedule can be considered a living policy. That is, you may need to make changes to accommodate your specific business requirements, and updates must be made to it on a periodic basis. These are prioritised for risk impact and communicated to the organisation.

Examples of fairly common changes are to keep records current with rules and regulations, to keep them longer than the legal requirement for valid operational purposes, and to add record type examples for frequently used records that do not appear in the retention schedule.

Changes to the retention period should never be for less time than the legal requirement; otherwise, you will be out of compliance with laws and regulations. There should be a strong operational justification for making any change to avoid keeping records longer than necessary. Keep in mind that regulations are frequently created to protect private information and that there may be repercussions for keeping records longer than their retention period.

If changes are made, don't forget to update them in the systems where the records are created, received, or stored. If your retention schedule is used to calculate destruction in electronic content applications, file management applications, or third-party vendor systems, make sure to update those systems as well. Documentation of changes to the retention schedule is also a key component of your organisation's policy compliance; ideally, your records retention schedule application retains an audit trail.

FACTORS USED TO DETERMINE RETENTION REQUIREMENTS

The retention schedule takes two factors into account when determining retention periods for records:

The legal research requirements constitute the legal obligations and considerations that must be taken into account when determining the legal retention periods for your records. Legal research requirements include both legal requirements and legal considerations.

THE RETENTION SCHEDULE TAKES INTO ACCOUNT ALL APPLICABLE FEDERAL AND STATE RECORDKEEPING LAWS AND REGULATIONS.

Legal Requirements

Legal requirements consist of recordkeeping-related laws, regulations, and tax requirements. These requirements must be complied with when determining the retention period for records. The retention schedule takes into account all applicable federal and state recordkeeping laws and regulations. Your legal research must include requirements for every jurisdiction in which you do business (states, countries, territories, etc.).

Legal Considerations

In addition to the recordkeeping laws and regulations, there are certain legal considerations that must be accounted for to determine retention periods for records. These considerations include risks from litigation and recordkeeping regulations that neglect to specify a definitive retention period. Legal considerations are not requirements, and your organisation may choose to lengthen or shorten legal considerations based on your risk tolerance.

Specifically, legal considerations include:

- Statute of limitations or limitation of actions specifying when a legal action or lawsuit may be initiated.

- Limitation of assessments for taxes that specify an unlikely occurrence. For example, the Internal Revenue Service may assess your taxes up to six years after you file your tax return if you understate your income by 25 percent or more. Since you are unlikely to ever understate your income by this amount, your risks are extremely small if you maintain tax records for less than six years.
- Laws containing requirements to keep records without stating specific records retention periods.
- Other concerns related to ongoing legal liability, such as exposure of employees to hazardous substances or product liability. For example, your company may be held liable for damages for an indefinite period into the future. You may choose to adopt a legal strategy to determine how long to keep records when it is unclear if or when the company will be held liable. Sometimes concerns related to litigation will result in especially long consideration periods, but this too should be weighed carefully, as keeping records longer than necessary may expose the company to risk.

ELEMENTS OF A HEALTHY RECORDS AND INFORMATION MANAGEMENT PROGRAMME

RIM CHALLENGES AND DESIRED STATE

COMMON CHALLENGES

Like many organisations, you face significant challenges relative to effectively managing your information assets created in the past, present, and future. Not only is the volume of information growing every year, but the number of obligations for managing information – and the risk of noncompliance – is increasing as well.

These obligations, which arise from statutory, regulatory, legal, operational, information security, and data privacy requirements present a complex set of needs for most organisations. They also put pressure on you to manage compliance in a cost-effective manner and to ensure that when a record is needed you can quickly find it.

Many organisations think of the retention schedule only in terms of how long it is legally required to keep records. Failing to consider the risks (and the cost) of keeping them longer than the required time can lead to serious consequences, including increased exposure to risk.

INDUSTRY BEST PRACTICES

The records and information management industry is governed by a set of practices called The Principles (www.ARMA.org). These practices govern our recommendations for a best-in-class records and information management programme. The Principles are:

Accountability | The records and information management programme should report to a senior level executive who will govern the programme by ensuring that RIM policies and procedures are implemented and enforced through audit and continual improvement.

Integrity | The records generated by the organisation should have a reasonable expectation of being authentic and reliable.

Protection | The records and information management programme should ensure that information generated by the organisation is subject to a reasonable amount of protection.

Compliance | The records and information management programme should be organised to ensure compliance with applicable laws, other authorities, and the organisation's policies.

Availability | The records and information management programme should allow for information to be retrieved and available when needed.

Retention | Information should be retained for a reasonable amount of time, taking into consideration regulatory and business obligations.

Disposition | Records and information that are no longer needed for regulatory or operational purposes should be disposed of securely.

Transparency | The policies and procedures governing the records and information management programme should be documented in an understandable manner and be made readily available to staff.

YOUR DESIRED STATE

For your organisation to achieve a best-in-class RIM programme means that each of the above principles should be addressed through the adoption of a systematic and consistent approach to the management of records, from the moment they are created to their ultimate destruction. Below are our recommendations, based on our knowledge of current RIM programmes and industry best practices, to control both the quality and quantity of the information generated.

RECORDS AND INFORMATION MANAGEMENT ROADMAP

STEP 1: GOVERNANCE

Establish a formal records and information management or information governance advisory committee, which is sponsored by a corporate level executive. This team should be comprised of senior executives and managers from IT, legal, compliance, key business units, RIM, and other business areas who personally oversee the actions needed to raise the profile of, and support improvements in, the standard of RIM at your organisation. (We recommend a maximum of eight people sit on the committee.) This committee should meet regularly (at least twice a year) to review the RIM policy, approve any proposed changes to the records retention schedule, and facilitate implementation of the programme throughout the enterprise.

Appoint a leader, such as a global records and information manager, who has responsibility for directing the programme. The responsibilities of this key role include:

- > Liaising with the governance committee
- > Developing policies and procedures associated with a company-wide RIM programme
- > Participating in the electronic records initiatives
- > Providing direction to and collaborating with department/business unit records coordinators on all aspects of the programme
- > Solving RIM challenges
- > Ensuring company-wide compliance with established procedures
- > Maintaining and updating the records retention schedule
- > Ensuring proper disposition of records scheduled for destruction
- > Collaborating with the archivists to preserve records of historical significance
- > Directing and training personnel
- > Directly and indirectly supervising staff

STEP 2: CREATE A RECORDS AND INFORMATION MANAGEMENT STRATEGY

A strategy is essential to your ability to procure funds, allocate resources, leverage other corporate initiatives, assign action items, stay on track - and defend your programme. It also defines how you will measure success.

STEP 3: RECORDS AND INFORMATION MANAGEMENT POLICY AND PROCEDURES

Responsibility and accountability for recordkeeping should be clarified and documented throughout the organisation. The RIM policy and procedures should be defensible, easy to understand, transparent, and adopted by all employees (and contractors). Records creation, management, access, preservation, retention, and secure disposal/destruction should be addressed for all formats – both paper and electronic. In addition, the policy and procedures should be reexamined periodically and updated to ensure they include current topics, such as social media and mobile device usage.

STEP 4: RECORDS RETENTION SCHEDULE

Develop a comprehensive, enterprise-wide records retention schedule that provides consistent rules for all record formats – both physical and digital. The retention schedule incorporates record classes that reflect your business and retention periods based on legal requirements, risk considerations, and operational/business needs.

STEP 5: EMPLOYEE COMMUNICATION AND TRAINING

Communication is a vital component in enforcing programme consistency and usage. Market your RIM programme using internal communication and management meetings. Publish the programme materials on your organisation's intranet site. Train employees through train-the-trainer workshops, web-based training, and/or eLearning courses.

STEP 6: APPLY RETENTION TO INACTIVE HARDCOPY RECORDS

The records retention schedule should be applied to inactive records storage on a systematic basis to promote consistency. Through the training process, systematic destruction procedures should be maintained to ensure that inactive hardcopy inventory is regularly reviewed for destruction.

STEP 7: APPLY RETENTION POLICIES TO ELECTRONIC RECORDS

The records retention schedule should be applied to electronic records to promote consistency in recordkeeping practices in all media. Electronic records can be unstructured (the content is free flowing, such as in email, Word, social media, etc.) or structured (data is entered into pre established fields, such as in an HR or inventory control application). Some electronic applications are semi-structured, meaning the application is a structured system in which unstructured records, such as PDF documents, images, or Word documents, are classified, maintained, and controlled.

To enable the management of your electronic records in compliance with your RIM policy, the following actions are suggested.

7.1 Understand Your Electronic Systems

- Collaborate with IT and legal to document your organisation's electronic systems in a data map and identify the systems of record. Systems of record contain the official business records that must be tracked over time in compliance with the retention schedule and must be produced in the event of a legal hold order for discovery purposes. These typically become the priority when applying retention rules. Other systems may contain duplicates of official records or data that does not comprise an official business record. While retention rules must be applied to these systems as well, they may be a lower priority initially. This exercise will also help you prepare for eDiscovery.
- Prioritise the systems of record. Which systems contain the most litigated or risk-related records? Include both unstructured systems and structured systems when prioritising. Focus on a smaller number of high-risk electronic systems when planning to implement retention rules in year one, followed by another grouping of systems in years two and beyond. Having a multi-year plan approved by legal, risk/compliance, and IT will enable ongoing implementation on pace with budget and resources.

7.2 Develop an Application/Data Map

- Identify key information on ownership, content, origin and distribution, and purge/deletion/hold/archival/backup practices for each application. If not already in place, it is important to document

key information about each of the applications and current functionality. Is there legacy data that was not migrated and exists in old media that may be costly to access? Is there a future migration plan that should be considered in the planning phase?

- Identify the official business records that are maintained within each application and map to the appropriate record class in the retention schedule. For example, an application that contains personnel performance reviews would be mapped to the personnel records class and its retention period. Once an application is mapped to the retention schedule, work with IT to determine the application's capabilities to retain, hold, and purge records.
- Compare the priority applications' current capabilities to determine the level of effort to implement retention rules (both retention periods and associated retention triggers, such as date of creation, expiration of license, termination of employment). The planning phase may culminate with turning on functionality that exists within the system, purchasing an upgrade or module, using an archive to store information, and more.
- Unstructured applications, such as SharePoint and network file shares, may require management by departments and employees. IT may support the application or repository and should be involved in any decisions to implement recordkeeping practices, but the actual management of unstructured records may fall to employees. This requires procedures, training, and publicised cleanup events to ensure that the retention policy is followed.

COLLABORATE WITH IT AND LEGAL TO DOCUMENT YOUR ORGANISATION'S ELECTRONIC SYSTEMS IN A DATA MAP AND IDENTIFY THE SYSTEMS OF RECORD.

STEP 8: PHASED INTERNATIONAL IMPLEMENTATION

If you conduct business globally, all the locations in which you operate should comply with your RIM programme policy, including regulations for data privacy. While you may have a retention schedule for the United States, other jurisdictions will have different retention rules for records. The best practice is to conduct legal research for all jurisdictions and create a single enterprise-wide schedule.

STEP 9: MAINTAIN

Update the policy and procedures to ensure they reflect current RIM practices throughout the organisation. Update the retention schedule by reviewing the records classification scheme and performing a legal refresh of the records retention periods on a regular basis (every one or two years). This ensures that you remain compliant with the regulations that apply to the business and that the records retention schedule reflects any changes in your business (such as mergers, acquisitions, and divestitures).

STEP 10: AUDIT AND MONITOR COMPLIANCE

Recordkeeping practices by your business units should be monitored through the incorporation of RIM audits (most often by the internal audit function). The results of these audits are fed back to the records steering committee for action, if necessary. There should be documented evidence of responses to audit results to ensure that all business units are in compliance with your RIM programme.

STEP 11: RECORDS AND INFORMATION MANAGEMENT INFRASTRUCTURE

In order to drive a successful implementation and ongoing oversight of an enterprise-wide RIM programme, a full-time dedicated resource (in addition to your steering committee as described in Step 1 of this section) is an absolute necessity. To this point, Iron Mountain recommends the establishment of a records and information management function to oversee and steer the development of an organisation-wide records and information management policy, procedures, and controls in the near or long term.

BEST PRACTICE RIM STAFFING MODEL



Executive Sponsors

Corporate sponsorship to ensure top-down cooperation and partnering.



Corporate Records Manager

Responsible for administration of programme. Ensures policies are designed to provide guidance to staff. Provides standards for compliance and provides core programme materials.



Corporate Legal, Audit, Compliance

Gives direction and oversight to meet regulatory compliance and legal considerations.



Records Analyst

Responsible for organising aspects of programme components, including complex analytical or interpretive tasks related to the application of retention conclusions to corporate records.



IT Systems Analyst

Responsible for analytical or interpretive tasks related to the application of retention conclusions to electronic records.



Records Coordinators

Provide administrative support at the department level and act as liaison between their (areas) and the records management programme.



Line of Business Representation

Drives implementation at the business unit level. Audits their programmes and annually certifies programme compliance.

WHAT HAPPENS WHEN THE RETENTION PERIOD IS UP?

You want to reduce cost and risk by destroying paper records as they meet retention requirements. Unfortunately, this is not as simple as it sounds. Retrieving and inventorying records in order to validate and sort each file by destruction eligibility date can be labor intensive and very expensive.

Iron Mountain can help. With Smart Sort, our trained records management team uses input from your database and records retention schedule to survey your inventory and identify destruction eligibility at the file level. We'll then recognise your records according to destruction eligibility year so that information can be destroyed according to your policy. Stored records will be sorted according to destruction eligibility year to simplify ongoing retention and destruction management. At the completion of your project, you'll have an up-to-date listing that enables accurate and efficient records management. This will reduce storage costs and mitigate legal discovery, audit, and compliance risks.

HOW ABOUT ELECTRONIC CONTENT?

Iron Mountain® Advisory Services combine technology with expertise when providing holistic IG services to evolving enterprise organisations. Our Content Classification and Data Remediation services help you classify and remediate both structured and unstructured data stored on premises, in the cloud, or in hybrid environments. Our Advisory Services team organises content according to your records retention schedule, enabling defensible disposition. Our experienced staff of consultants, data scientists, and lawyers can work with your organisation to help configure, develop, and apply methodology over legacy and day-forward content. You'll get help normalising and updating metadata, making it more consistent and improving accessibility for both structured and unstructured data.

For more information, visit:

Denmark: www.ironmountain.dk/services/information-governance-advisory

Finland: www.ironmountain.fi/fi/services/information-governance-advisory

Norway: www.ironmountain.no/services/information-governance-advisory

Sweden: www.ironmountain.se/sv/services/information-governance-advisory

RECORDS AND INFORMATION MANAGEMENT GLOSSARY OF TERMS

Access | The right opportunity and means of finding, using, or retrieving information.

Active Records | Records related to current or in-process activities.

These records are typically referred to on a regular basis to respond to internal and external business requirements.

ARMA | The Association of Records Managers and Administrators, which is an international organisation for records and information management professionals. ARMA is creator of GARP®. For more information, go to www.arma.org.

Auto-Classification | The classification of electronic information by an application that uses search terms, machine learning, algorithms, and more, either alone or in some combination. This removes the burden of classification of content by users.

Business Function | A set of major responsibilities or operations performed by the company to fulfill its goals. A business function is the highest level of the records classification scheme.

Capture | An action that results in the placement of a record into an official recordkeeping system.

Classification | The systematic identification and arrangement of business activities and/or records into categories.

Cloud | The cloud is a term used for services related to electronic records storage or transactions that are provided off premises. In terms of records storage, your records are stored on the provider's servers in either a public or private environment. It is important to ensure that your records are protected to the level of your needs and that the provider can accommodate your records and information management requirements for access, preservation, retention, destruction, etc.

Confidential Records | Records that contain sensitive, proprietary, or personal information that must not be disclosed beyond those individuals who are authorised to have access.

Create (a Record) | The act of making a record (evidence) of a business action.

Department of Defense (DOD) 5015.2 | This is a records and information management standard developed by the DOD and adopted by the primary providers of electronic content and records and information management applications.

Destruction | The process of eliminating or deleting records.

Destruction Hold | The procedure used to temporarily cease destruction of certain groups of records, even if they are eligible for destruction.

Document (noun) | Recorded information that can be treated as a unit.

Electronic Record | A record created and/or maintained by means of electronic equipment.

Email | An Internet protocol that allows computer users to exchange messages and information with other users in real time, locally and across networks. Email is not a particular document type but rather a delivery method for many document types.

Historical Records | Records that have continuing value and significance and are appraised for long-term preservation in your historical records programme.

Indexing | The process of establishing access points to facilitate retrieval of records and/or information.

Inactive Records | Records that are related to closed, completed, or concluded activities. Records become inactive when they are no longer routinely referenced but must be retained to fulfill legal, regulatory, operational, or other retention requirements.

ISO 15489 | This is the International Organisation for Standardisation's section on the creation and management of business records.

Metadata | Data describing the context, content, and structure of records and their management through time.

Official Records | Complete and final records that are required to be retained for business, including legal reasons. Official records provide evidence of your organisation, business functions, policies, decisions, procedures, operations, and internal or external transactions.

Policy | A high-level plan or course of action intended to guide and determine decisions, actions, and other matters.

Procedure | Established or prescribed methods of performance to be followed routinely to implement policy.

Record Class | A category of records that supports one or several closely related business activities and has similar business and/or legal retention requirements. A record class is the second level of the records classification scheme.

Record | Information that is created, received, and maintained as evidence and information by an organisation or a person in pursuance of legal obligations or in the transaction of business.

Records and Information Management | The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, and disposition of records. This includes processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

Records and Information Management Programme
A comprehensive programme created for the systematic control of records throughout their lifecycle in order to achieve adequate and proper documentation of the policies, processes, and transactions at your organisation.

Records Classification Scheme
A hierarchical classification tool which, when applied to a business information system, can facilitate the capture, titling, retrieval, maintenance, and disposal of records and other information.

Records Retention Schedule

A document that identifies and describes your records at a functional level and provides retention periods for records based on their operational, financial, and legal value.

Retention Period | The length of time records must be kept for legal, regulatory, or operational purposes.

Role-Based Classification

A method by which using information about a user based on their department or role (often inferred from the active directory group) can be used to infer a default retention rule for their unstructured records, including email.

Security | Measures taken to protect materials from unauthorised access, change, destruction, or other threats.

Social Media | Web- and mobile-based technologies which are used to turn communication into interactive dialogue among organisations, communities, and individuals.

Structured Electronic Records

Records created and maintained in applications where each field within the application has an assigned meaning and format.

Transfer | Change of custody, ownership, and/or responsibility for records.

Transitory Records | Records that have little or no documentary or evidential value and that need not be set aside for future use. Examples of transitory records include correspondence that requires no administrative action, policy decision, or special handling, as well as unofficial copies of quasi-official notices, such as memoranda, that are not used as the basis of an administrative or programme action or decision.

Unofficial Records | Records that are not required to be retained for business or legal reasons. These may include duplicates or convenience copies of official records that have not been annotated and may be destroyed when no longer referenced.

Unstructured Electronic Records

Records in which the content does not have a defined structure; the user can create the content of the record with any information of their choosing. Unstructured electronic records include documents, spreadsheets, email messages, and other files created using desktop applications.

Vital Records | Records necessary to ensure the ongoing operation in the event of a disaster or other disruption to normal operating conditions (e.g., power outage), as well as rights-and-interests records necessary to protect the assets, obligations, and resources of the organisation, its employees, and customers.

RECORDS AND INFORMATION MANAGEMENT REFERENCE SOURCES

The following sources can be used to learn more about records and information management practices:

ARMA International www.arma.org

AIIM www.aiim.org

EDRM www.edrm.net

Sedona thesedonaconference.org/

Iron Mountain www.ironmountain.com

Iron Mountain Denmark www.ironmountain.dk

Iron Mountain Finland www.ironmountain.fi

Iron Mountain Norway www.ironmountain.no

Iron Mountain Sweden www.ironmountain.se

Iron Mountain Smart Sort www.ironmountain.com/smartsort

Iron Mountain Advisory Services

Denmark: www.ironmountain.dk/services/information-governance-advisory

Finland: www.ironmountain.fi/fi/services/information-governance-advisory

Norway: www.ironmountain.no/services/information-governance-advisory

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ABOUT IRON MOUNTAIN

Iron Mountain Incorporated (NYSE: IRM), founded in 1951, is the global leader for storage and information management services. Trusted by more than 220,000 organisations around the world, and with a real estate network of more than 85 million square feet across more than 1,400 facilities in over 50 countries, Iron Mountain stores and protects billions of information assets, including critical business information, highly sensitive data, and cultural and historical artifacts. Providing solutions that include secure storage, information management, digital transformation, secure destruction, as well as data centres, art storage and logistics, and cloud services, Iron Mountain helps organisations to lower cost and risk, comply with regulations, recover from disaster, and enable a more digital way of working. Visit www.ironmountain.com for more information.

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