TRUTH OR DARE:
CAN YOU PROVE COMPLIANCE?

Insert Presenter Name
AGENDA

Drivers
Describe the Framework
Review Controls
Implementation Advice
  ▪ Oversight & Delivery
  ▪ Measures of Success
  ▪ Plans for Improvement
Your Compass for Action
Have you experienced THE GAP?
There’s you… and your team
CHALLENGES
Multiple business units, geographies, regulatory & operational requirements...

and all of this!
THE RIM RISK FRAMEWORK
A PRACTICAL GUIDE FOR A RECORDS AND INFORMATION MANAGEMENT RISK & CONTROL FRAMEWORK

A PRACTICAL GUIDE
Risk & Control Framework

WHITE PAPER
INFORMATION IS YOUR ADVANTAGE

A PRACTICAL GUIDE FOR A RECORDS AND INFORMATION MANAGEMENT RISK & CONTROL FRAMEWORK

A PRACTICAL GUIDE
Risk & Control Framework

WHITE PAPER
INFORMATION IS YOUR ADVANTAGE
Establish an operational self-assessment program

1. Institutionalize a consistent protocol for all to use
2. Allow business managers to diagnose their performance
3. Identify and address weaknesses in RIM processes
4. Provide evidence of compliance to authorities
RIM
Risk + Control

- TRAINING
- GOVERNANCE
- INVENTORY
- STAFFING
- RETENTION
- DISPOSITION
- VENDOR MANAGEMENT
- PRIVACY & SECURITY
- LEGAL HOLDS
Establish a consistent rating scale for all controls

COMMUNICATE
Purpose & Process
## DISPOSITION

<table>
<thead>
<tr>
<th>CONTROL</th>
<th>DESCRIPTION</th>
<th>SUPPORTING INFO</th>
<th>RATING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secure Destruction of Eligible Records</td>
<td>Records eligible for destruction are securely disposed of in accordance with RIM Policy and Information Security protocols.</td>
<td>Roles and responsibilities of the secure disposition process are clearly defined and communicated in policy and procedure. Electronic data or physical record secure destruction standards are upheld consistently and audited.</td>
<td>1. All eligible records are disposed of routinely and securely. The process is documented and regularly audited. 2. Eligible records are disposed of securely, but the process is not audited or discrepancies have been found in the process. 3. Some, but not all, eligible records are securely destroyed or there is no confirmation in writing of the secure destruction. 4. Records are not disposed of in a secure manner.</td>
</tr>
</tbody>
</table>
Taking guidance from the RIM team, each LOB must develop a records index in sufficient detail as to fully support Legal Hold, e-Discovery, and records retrieval processes for paper and electronic content. This indexing includes the appropriate records classification and storage location for each identified record.

LOB indexing reflects the use of the appropriate record code/record class from the company retention schedule.

Indexing provides sufficient supporting information so as to be able to consistently retrieve records in a timely fashion when needed, place Legal Holds on material responsive to Hold Notices, or for e-Discovery purposes.

<table>
<thead>
<tr>
<th>CONTROL</th>
<th>DESCRIPTION</th>
<th>SUPPORTING INFO</th>
<th>RATING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line of Business (LOB) Records Indexing</td>
<td>Taking guidance from the RIM team, each LOB must develop a records index in sufficient detail as to fully support Legal Hold, e-Discovery, and records retrieval processes for paper and electronic content. This indexing includes the appropriate records classification and storage location for each identified record.</td>
<td>LOB indexing reflects the use of the appropriate record code/record class from the company retention schedule. Indexing provides sufficient supporting information so as to be able to consistently retrieve records in a timely fashion when needed, place Legal Holds on material responsive to Hold Notices, or for e-Discovery purposes.</td>
<td>1. LOB maintains complete and accurate indexing of all records &amp; can respond to Legal Hold notices, or requests to produce information, in a timely and efficient manner. Performs self-audit at least annually to reconcile vendor indexing with LOB indexing of physical records. Changes made to Schedules are updated accordingly.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. LOB maintains an index of records but it is not fully complete, accurate or updated periodically to reflect changes to the Schedule.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. LOB maintains some indexing, but it does not capture all of the electronic and physical records. It may be largely focused on physical records, and does not reflect the requirements of the current Schedule.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4. LOB does not maintain any index other than what is in physical records vendor tracking inventories and/or data maps.</td>
</tr>
</tbody>
</table>
IMPLEMENTATION
Take a Leading Role

Your Involvement

- Initiate & collaborate in selection of controls
- Provide input into collection method
- Communicate purpose & practice to lines of business
- Conduct a pilot
Establish a formal process for review and maintenance

**ANNUALLY**
- Identify new risks, add or modify controls
- Confirm applicability of current controls, edit as required
- Review input from LOBs re ease of use, rating system, etc.
- Make appropriate changes to process & communicate to LOBs
- Monitor methodology
- Engage any new stakeholders

**QUARTERLY**
- Assess how controls are functioning
- Recommend changes to oversight team & communicate to LOBs

**CONTINUOUSLY**
- Identify gaps in Framework design & execution
- Receive input from LOBs
- Recommend changes, as required
Method of delivery

Provide evidence of submission

USE TECHNOLOGY
- Survey tool
- Dashboards

OTHER OPTIONS
- Excel Spreadsheets
- Word or PDF forms
- In-Person interviews
Roles and responsibilities

- **Risk**
  - Protect brand, finances, and operations

- **Legal**
  - Risk profile and litigation exposure

- **Compliance**
  - Ensures requirements are met

- **RIM**
  - Oversees program

- **LOB**
  - Establishes Risk Awareness

- **IT**
  - Proper protection of data
Measures of success

- Improved LOB ratings year-over-year
- KPI & KRI improvements
- Increased employee awareness of RIM policy and requirements
- Lack of regulatory criticism
- Improved audit results
- Avoidance of damage to your brand

Identify, capture, and review on an on-going basis
Which risks pose the greatest threat to your organization and which controls must be enhanced immediately to close off gaps?

What is the cost/benefit ratio for the enhancements?

Can the RIM team alone institute changes to enhance the controls, or is a partnership with another functional area required?

What resources are required to enhance the controls?

Move the scale

Use the ratings to assess how you measure up
ACTION ITEMS
Your Compass

- Leverage the guide
- Promote the Framework
- Align with Partners
- Select appropriate controls
- Pilot the self-assessment process
- Use results to gain support

Celebrate your success!
To obtain a free copy of the Practical Guide For a Risk & Control Framework please visit:

ironmountain.com/thoughtleadership

1.800.899.4766 (IRON)