

# Third Party Downloader Service



## The Industry Leading Third Party Downloader Service for SEC Compliance

**Is your firm SEC Compliant? (Maybe you should double check).** The best way to avoid regulatory problems with your e-mail is to be SEC compliant in the first place. But many securities firms overlook a key requirement. All broker-dealer firms that store e-mail or other records electronically must have a third party designated with the SEC who can download the firm's archived electronic records. This designated downloader must be a third party who has access to the broker-dealer's e-mail and other electronic records and can provide e-records to the SEC if requested.

More broker-dealers trust Iron Mountain to be their third party downloader service provider than any other. In fact, six of the top ten broker-dealer firms in the U.S. count on Iron Mountain for compliant, secure and reliable third party downloader service.

### BENEFITS OF WORKING WITH IRON MOUNTAIN

**Unparalleled experience and expertise.** In 1993 Iron Mountain was the first company to file a third party undertaking to the SEC. With 10 years of experience, our service delivers proven compliance to broker-dealer firms of all sizes.

**Cost-effective.** Iron Mountain works with broker-dealers to implement cost-effective and operationally sound processes that meet the firm's needs, while complying with all applicable regulatory requirements.

**Solutions tailored to your needs.** Iron Mountain's Third Party Downloader Service is available in two service options.

- **Stand-alone.** Works with your existing in-house electronic record archiving solution. Additionally, we offer an off-site vaulting service to meet the SEC Rule 17a-4 requirement to store a duplicate copy of the records in a separate location.
- **Part of the Iron Mountain digital archiving solution.** Provides rapidly implemented, compliant and cost-effective digital archiving of electronic records. Our e-Mail Archiving Service delivers assured e-mail compliance for SEC Rule 17a-4, NASD and NYSE. Both service options also meet e-records compliance requirements for CFTC Rule 1.31.

### How Iron Mountain Ensures Compliance

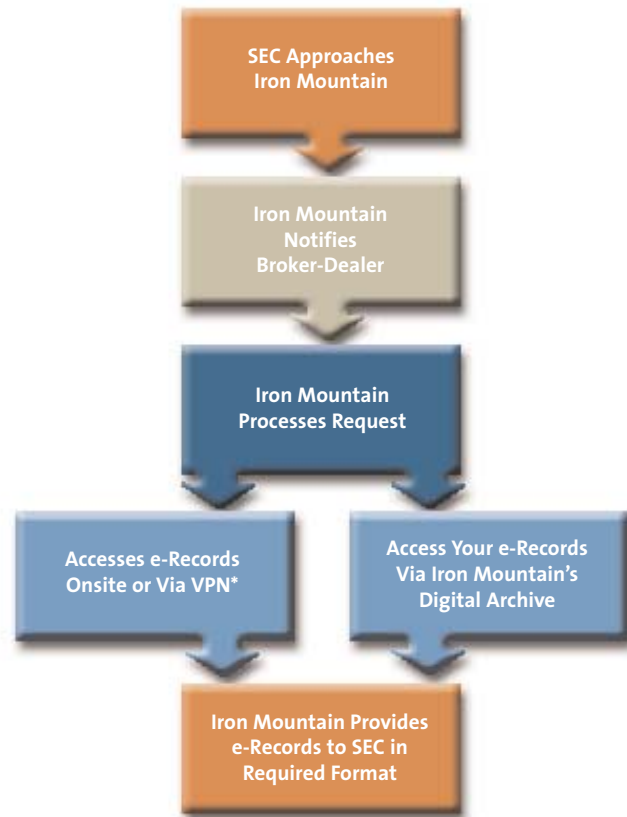
SEC Requirement Third Party Requirement	Iron Mountain Solution	Assured Compliance
Have the know-how to access e-records at any time.	We document your archiving environment including hardware, software, locations etc..	Twice per year, Iron Mountain audits your environment to note any changes.
Have the ability to access e-records whenever necessary.	We obtain legal rights to access your on-site system (either by physical access or remote access via VPN)	At least once per year we conduct a retrieval test - either on-site or remotely and document the results.

## SERVICE COMPONENTS

As a full-service third party downloader provider, Iron Mountain will execute all of the following requirements on your behalf:

- Develop and maintain the Archiving Environment Guide, which explains how to access your e-records. Included in the guide are:
  - Archiving environment documentation
  - Information required to access e-records (including passwords or access authorization)
  - Seamless processes that will allow Iron Mountain to access your e-records and indexes.
- Provide formal submission to the SEC
  - A Letter of Undertaking stating that Iron Mountain will undertake to take reasonable steps to provide access to the information and will furnish the documents to the SEC, its designees or representatives if and when called upon.
  - A description of the Iron Mountain Third Party Downloader Service
- Submit to the designated SRO and the State Regulators (as applicable) copies of the correspondence to the SEC, or provide notice of Iron Mountain's Third Party Downloader Services as required by the specific agency.
- Complete an annual test and compliance audit report to demonstrate Iron Mountain's on-going ability to access the customer's e-records.

### How Iron Mountain Would React to a SEC Request



#### What happens if the SEC makes a request to Iron Mountain for your e-records?

Iron Mountain will first notify you that the SEC has made the request. We will then use the Archiving Environment Guide to access and download the requested e-records. \*This step can take place on location, remotely via a virtual private network, or through Iron Mountain's Digital Archives user interface (depending on your service option). The downloaded e-records are then provided to the SEC in whatever format they require.

Get compliant with the leading third party download provider, Iron Mountain - where more broker-dealers put their trust.

To learn more, call (617) 535-2800 or visit us at: [www.ironmountain.com/digital](http://www.ironmountain.com/digital).



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Today, with over \$1 billion in annual revenues, Iron Mountain operates in major markets worldwide, serving thousands of customers in more than 80 markets in the U.S. and 40 markets in Europe, Canada, and Latin America. For more information, visit our Web site at [www.ironmountain.com](http://www.ironmountain.com)