



DIGITAL REALTY TRUST, INC./DIGITAL REALTY TRUST, L.P.

INDEPENDENT SERVICE AUDITOR'S SOC 3 REPORT

FOR THE

DATA CENTER SERVICES SYSTEM

FOR THE PERIOD OF JANUARY 1, 2022, TO DECEMBER 31, 2022

Attestation and Compliance Services



Proprietary & Confidential

Unauthorized use, reproduction, or distribution in whole or in part without prior written consent is strictly prohibited.

INDEPENDENT SERVICE AUDITOR'S REPORT

To Digital Realty Trust, Inc. and Digital Realty Trust, L.P. (together with their respective subsidiaries, "Digital Realty" or the "service organization"):

Scope

We have examined Digital Realty's accompanying assertion titled "Assertion of Digital Realty Trust, L.P. Service Organization Management" ("assertion") that the controls within Digital Realty's Data Center Services system ("system") were effective throughout the period January 1, 2022, to December 31, 2022, to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved based on the trust services criteria relevant to security and availability set forth in TSP section 100, *Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria)*.

Service Organization's Responsibilities

Digital Realty is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved. Digital Realty has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Digital Realty is responsible for selecting, and identifying in its assertion, the applicable trust services criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and systems requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements;
- Assessing the risks that controls were not effective to achieve Digital Realty's service commitments and system requirements based on the applicable trust services criteria; and
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Digital Realty's service commitments and system requirements based on the applicable trust services criteria.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk

that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Digital Realty's Data Center Services system were effective throughout the period January 1, 2022, through December 31, 2022, to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

SHELLMAN & COMPANY, LLC

Tampa, Florida
June 11, 2023

ASSERTION OF DIGITAL REALTY SERVICE ORGANIZATION MANAGEMENT

We are responsible for designing, implementing, operating, and maintaining effective controls within Digital Realty's Data Center Services system ("system") throughout the period January 1, 2022, to December 31, 2022, to provide reasonable assurance that Digital Realty's service commitments and system requirements relevant to security and availability were achieved. Our description of the boundaries of the system is presented below and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period January 1, 2022, to December 31, 2022, to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved based on the trust services criteria relevant to security and availability (applicable trust services criteria) set forth in TSP section 100, Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria). Digital Realty's objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and systems requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented below.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period January 1, 2022, to December 31, 2022, to provide reasonable assurance that Digital Realty's service commitments and systems requirements were achieved based on the applicable trust services criteria.

DESCRIPTION OF THE BOUNDARIES OF THE DATA CENTER SERVICES SYSTEM

Company Background

Digital Realty provides data center, colocation, and interconnection solutions for customers across a variety of industry verticals through a portfolio of data centers located throughout North America, Europe, South America, Asia, Australia, and Africa. If a customer is not served through the focal data center, the portions of this description that cover the focal data center will not be relevant to that customer. In addition, as discussed below, certain services provided by Digital Realty are not within the scope of this report. For that reason, it is recommended that customers confirm the data center(s) through which they are served by contacting their Digital Realty account executive.

Types of Services Provided

While Digital Realty provides a variety of services to its customer, this report covers only the specific services set forth below (the “Data Center Services”) and excludes all other services. Although the Data Center Services are provided on a widespread basis across Digital Realty data centers, these Data Center Services may differ to some extent across data centers, solutions, and customers. If a customer receives different Data Center Services, the portions of this description that cover the Data Center Services will not be relevant to that customer. For that reason, it is recommended that customers confirm the Data Center Services they receive by contacting their Digital Realty account executive.

The term “Data Center Services” is limited to the following services provided by Digital Realty:

- Suites or cabinets
- Physical security
- Heating, ventilation, and air conditioning (HVAC)
- Fire detection and fire suppression
- Power

While Digital Realty may provide customers the following services, they are not considered “Data Center Services” for the purpose of this Report and are, accordingly, outside the scope of this Report:

- Cross-Connect (Cross-Connect, Pack, Riser Fiber, Intra-customer Connectivity, and Metro Cross-Connect)
- Digital Realty Internet Exchange (DRIX)
- Dedicated Internet Access (DIA)
- Service Exchange
- Service Fabric

These services (and any other service provided by Digital Realty outside of the five services listed in the definition of “Data Center Services”) are “Out of Scope Services.” This report and description exclude services provided by (i) Interxion II B.V. and its subsidiaries, which are subsidiaries of Digital Realty, and (ii) joint ventures of which Digital Realty is directly or indirectly an equity owner, unless the report states otherwise; and (ii) Out of Scope Services.

System Boundaries

A system is designed, implemented, and operated to achieve specific business objectives in accordance with management-specified requirements. The purpose of the system description is to delineate the boundaries of the system, which includes the services outlined above and the five components described below: infrastructure, software, people, procedures, and data.

The scope of this report includes the Data Center Services system provided to Digital Realty’s customers at the Digital Realty data center facilities noted in the table below.

Digital Realty Data Center Facilities	
Site Code	Address
ACC4	44480 Hastings Drive, Ashburn, Virginia
ACC5	44521 Hastings Drive, Ashburn, Virginia
ACC6	44461 Chillum Place, Ashburn, Virginia
ACC10	21744 Sir Timothy Drive, Ashburn, Virginia
AMS15	Jan Wijsmullerdreef 10 (De President Business Park), Amsterdam, Netherlands
AMS17	Science Park, Amsterdam, Netherlands
AMS18	Amstel Business Park, Amsterdam, Netherlands
ATL13	56 Marietta Street, Atlanta, Georgia
ATL14	250 Williams Street, Atlanta, Georgia
AUS11	7500 Metro Center, Austin, Texas
BOS13	55 Middlesex Turnpike, Bedford, Massachusetts
BOS14	128 First Avenue, Needham, Massachusetts
BOS16	105 Cabot Street, Needham, Massachusetts
CH1	2200 Busse Road, Elk Grove Village, Illinois
CH3	1400 Devon Avenue, Elk Grove Village, Illinois
CLT10	113 N Myers Street, Charlotte, North Carolina
DFW10	2323 Bryan Street, Dallas, Texas
DFW11	4025 Midway Road, Carrollton, Texas
DFW12	2440 Marsh Lane, Carrollton, Texas
DFW14	4849 Alpha Road, Dallas, Texas
DFW16	1232 Alma Road, Richardson, Texas
DFW17	900 Quality Way, Richardson, Texas
DFW18	1210 Integrity Drive, Dallas, Texas
DFW28	850 E. Collins Boulevard, Richardson, Texas
DFW29	950 E. Collins Boulevard, Richardson, Texas
DFW35	907 Security Row, Richardson, Texas
DFW36	8435 Stemmons Freeway, Dallas, Texas
DUB10	Unit 9 Blanchardstown Corporate Center, Dublin, Ireland
DUB12	Clonsaugh Industrial Estate (Eircom), Dublin, Ireland
DUB13	Profile Park (Bldg 1), Dublin, Ireland
DUB14	Profile Park (Bldg 2), Dublin, Ireland
EWR10	300 JFK Boulevard East, Weehawken, New Jersey
EWR11	3 Corporate Place, Piscataway, New Jersey

Digital Realty Data Center Facilities

Site Code	Address
EWR12	365 S Randolphville Road, Piscataway, New Jersey
EWR20	100 Delawanna Avenue, Clifton, New Jersey
EWR21	2 Peekay Drive, Clifton, New Jersey
FRA28	Lyonerstrasse, Frankfurt, Germany
FRA30	Wilhelm-Fay Strasse 24, Frankfurt, Germany
FRA31	Wilhelm-Fay Strasse 24 (Bldg 2), Frankfurt, Germany
FRA32	Wilhelm-Fay Strasse 24 (Bldg 3), Frankfurt, Germany
HKG10	33 Chun Choi Street, Hong Kong, Hong Kong
HKG11	11 Kin Chuen Street, Hong Kong, Hong Kong
HVN10	60-80 Merritt Boulevard, Trumbull, Connecticut
IAD12	43881 Devin Shafron Drive (Bldg B), Ashburn, Virginia
IAD14	43791 Devin Shafron Drive (Bldg D), Ashburn, Virginia
IAD15	43915 Devin Shafron Drive (Bldg A), Ashburn, Virginia
IAD24	43830 Devin Shafron Drive (Bldg F), Ashburn, Virginia
IAD30-32	4030/4040/4050 Lafayette Center Drive, Chantilly, Virginia
IAD35	43940 Digital Loudoun Plaza (Bldg G), Ashburn, Virginia
IAD36	43780 Digital Loudoun Plaza (Bldg H), Ashburn, Virginia
IAD37	44060 Digital Loudoun Plaza (Bldg K), Ashburn, Virginia
IAD38	44100 Digital Loudoun Plaza (Bldg J), Ashburn, Virginia
IAD39	44274 Round Table Plaza (Bldg L), Ashburn, Virginia
IAD40	44462 Round Table Plaza (Bldg M), Ashburn, Virginia
IAD41	44751 Round Table Plaza (Bldg P), Ashburn, Virginia
IAD42	2215 Broderick Drive (Bldg R), Ashburn, Virginia
IAH11	12031 N Freeway, Houston, Texas
IAH13	12235 N. Freeway, Houston, Texas
IAH14	12231 N Freeway, Houston, Texas
JFK10	111 8th Avenue, New York, New York
JFK12	60 Hudson Street, New York, New York
JFK13	32 Avenue of the Americas, New York, New York
KIX10	5-8-1 Yamabuki, Osaka, Japan
KIX11	6-1 Aokita, Saito, Minoh-shi, Osaka, Japan
KIX12	6-2-1 Aokita, Saito, Minoh-shi, Osaka, Japan
LAX10	600 W Seventh Street, Los Angeles, California
LAX12	2260 E El Segundo Boulevard, El Segundo, California
LGW10	Foxboro Business Park – Unit 3, Redhill, UK

Digital Realty Data Center Facilities

Site Code	Address
LGW14	Unit 21 Goldsworth Park, Woking, UK
LGW15	Unit 1 Power Avenue, Crawley, UK
LGW16	Unit 2 Power Avenue, Crawley, UK
LHR13	1 Fountain Court, Chessington, UK
LHR14	The Chess Building – Watford, London, UK
LHR17	Unit 1 Airport Gate, London, UK
LHR18	1 Oliver's Yard, London, UK
LHR19	47 Millharbour, London, UK
LHR20	227 Marsh Wall (Sovereign House), London, UK
LHR21	215 Marsh Wall (Meridian Gate), London, UK
MEL11	72 Radnor Drive, Melbourne, Australia
MEL10	98 Radnor Drive, Melbourne, Australia
MIA10	36 NE Second Street, Miami, Florida
NRT10	2-9-3 Otsuka, Tokyo, Japan
OAK10	720 Second Street, Oakland, California
ORD10	350 E Cermak Road, Chicago, Illinois
ORD11	600-700 S. Federal Street, Chicago, Illinois
ORD12	9333 Grand Avenue, Franklin Park, Illinois
ORD13	9355 Grand Avenue, Franklin Park, Illinois
ORD14	9377 Grand Avenue, Franklin Park, Illinois
ORD23	505 N Railroad Avenue, Northlake, Illinois
PDX10	3825 Northwest Aloclek Place, Hillsboro, Oregon
PDX11	6675 NE 62nd Avenue, Hillsboro, Oregon
PHX10	120 E Van Buren Street, Phoenix, Arizona
PHX15	2121 S Price Road, Chandler, Arizona
SC1	2220 De La Cruz Boulevard, Santa Clara, California
SFO10	200 Paul Avenue 1-4, San Francisco, California
SFO12	365 Main Street, San Francisco, California
SIN10	29A International Business Park, Singapore, Singapore
SIN11	3 Loyang Way, Singapore, Singapore
SIN12	11 Loyang Close, Singapore, Singapore
SJC10	1100 Space Park Drive, Santa Clara, California
SJC11	3011 Lafayette Street, Santa Clara, California
SJC15	1201 Comstock Street, Santa Clara, California
SJC16	1525 Comstock Street, Santa Clara, California

Digital Realty Data Center Facilities	
Site Code	Address
SJC29	1725 Comstock Street, Santa Clara, California
SJC30	3105 Alfred Street, Santa Clara, California
SJC31	2805 Lafayette, Santa Clara, California
SJC34	2820 Northwestern Parkway, Santa Clara, California
SJC35	3205 Alfred Street, Santa Clara, California
SYD10	1-11 Templar Road, Sydney, Australia
SYD11	13-23 Templar Road, Sydney, Australia
TOR1	1 Century Place, Ontario, Canada
VA3	1780 Business Center Drive, Reston, Virginia
YYZ10	371 Gough Road, Ontario, Canada

PRINCIPAL SERVICE COMMITMENTS AND SYSTEM REQUIREMENTS

Digital Realty implements procedures and controls to meet its objectives for Data Center Services. Those objectives are based on the service commitments that Digital Realty makes to user entities, the laws and regulations that govern the provision of Data Center Services, and the financial, operational, and compliance requirements that Digital Realty has established for the services.

Principal Service Commitments

Security and availability commitments to user entities are documented and communicated in customer agreements, global Master Services Agreements (MSAs) and Service Level Agreements (SLAs) as well as in the description of the Data Center Services provided online. Digital Realty makes the following security and availability commitments to their customers:

- Make available the services to customers for the service term
- Establish, implement, and maintain commercially reasonable industry standards for physical security and protection
- Establish, implement, and maintain commercially reasonable industry standards to make the services available
- Make available the data center space 24 hours per day, 7 days a week
- Provide services in a manner that meets applicable laws and regulations

System Requirements

Digital Realty establishes operational requirements that support the achievement of the principal service commitments, relevant laws and regulations, and other system requirements.

These requirements include the following capabilities:

- **Availability Monitoring:** Dedicated personnel are responsible for the 24x7 monitoring and remediation of system events affecting availability. Software and other technologies are deployed to manage system availability and capacity levels against predefined thresholds.
- **Infrastructure Redundancy:** Redundant infrastructure is available and configured to process transactions when primary systems are unavailable.
- **Physical Security Perimeter:** Security perimeters are used to protect areas that contain information and information processing facilities – using walls, controlled entry doors/gates, manned reception desks, and other measures.
- **Physical Entry Controls:** Policies and procedures are implemented to limit physical access to its electronic information systems and the facility or facilities in which they are housed, while ensuring that properly authorized access is allowed.
- **Temperature and Humidity Monitoring:** Temperature and humidity are monitored to maintain the environment temperature and humidity in accordance with standard guidelines for datacom equipment.
- **Preventative Maintenance Program:** Preventative maintenance programs on environmental systems are performed at least annually beginning no later than twelve months from the commissioning period.
- **Employee Training:** Employees are required to complete training upon hire and on a regular interval to understand their obligations and responsibilities to comply with the corporate and business unit commitments and the associated system requirements.

Infrastructure and Software

The infrastructure supporting the Data Center Services includes the data center building, the suites within, security cameras, physical access control devices, interconnection routers, and switches and the servers supporting the applications noted below. The building is also equipped with uninterruptible power supply (UPS), fire detection, and suppression systems, back-up generators, and HVAC systems to protect against threats to environmental security.

The primary in-scope systems utilized for delivery of the Data Center Services are the physical access control system applications and the logical access to interconnection routers and switches. These commercial badge access applications are based on the Windows operating systems, and are used to provision, de-provision, and manage user access to the building and suites contained within. Network device login and access is governed by an access control system tied to directory services. These devices serve as interconnection devices that provide data forwarding between internal networks and Ethernet exchanges. The routers and switches include Cisco, Juniper, and Dell equipment.

Secondary applications utilized to support delivery of the Data Center Services include:

- **Digital Realty DMZ application** – utilized for provisioning individual IDs for third party team members to access InSite/ServiceNow.
- **Building Management System (BMS)** – utilized by the site engineering team to monitor and control environmental systems.
- **Network Monitoring Application** – utilized to detect and log changes made to network device configurations.
- **Salesforce** – utilized to track network changes, cross-connects, and complex installations through completion.
- **ServiceNow/Insite** – the third-party cloud-based Integrated Work Order Management System is utilized for Maintenance Management, Security Access & Authorization, Incident Reporting, & Customer Request modules.

The Data Center Services system is limited to the data center services and related infrastructure maintained by Digital Realty and does not include customer entity systems, or the Internet connectivity utilized for accessing their environments.

The in-scope infrastructure consists of multiple applications, operating system platforms and databases, as shown in the table below:

Production Systems			
Production Application	Business Function Description	Operating System Platform	Physical Location
Web, Application, and Database Servers	Application and database servers that support physical access systems.	Windows	Digital Realty property-level locations
Database	Physical access system data storage.		
Firewall and Router Systems	Front-end firewalls protect the network perimeter based on rule-based access control lists.	Juniper Cisco	
Access Control System	Manages Authentication for virtual private network (VPN), firewalls, and network devices.	Linux	
Directory Services	Provides access control and directory services for all users and systems.	Windows	
Commercial Badge Access Applications	Security Management System, supporting badge access.		

People

Digital Realty’s Senior Vice President (SVP) of Global Operations oversees the electrical and mechanical engineering specialists who maintain and monitor platforms of all the data center facilities. More specifically, the SVP of Global Operations ensures that the specialists are properly trained, and that systems and processes are in place to ensure continual facilities uptime, system-wide security consciousness, and consistent service execution.

Digital Realty employs regional vice presidents, directors and managers of technical operations who are responsible for process, quality, and compliance with all aspects of technical operations and engineering functions. These individuals have significant experience with the operation and maintenance of diverse mission critical electrical and mechanical equipment. Core groups supporting day-to-day operations include the following:

- Site Engineering – responsible for operation and maintenance of diverse mission critical electrical and mechanical equipment; develops detailed specifications and bills of materials for customer installations; and ensures that colocation and interconnection inventory is accurately updated and maintained.
- Security – responsible for 24x7 monitoring of the building, administration of physical access systems, and responding to alerts/events.
- Site Management – primary point of contact for all customer inquiries; responsible for non-technical operations of the site; performs all billing, lease, and financial reporting functions.
- Customer Services – escalation point for addressing customer needs. Responsible for event management (including problem and incident management coordination), corporate escalations, emergency response communications, after event reporting/documentation coordination and release, emergency management coordination, corporate and customer documentation and off-site support for site and/or customer communications.
- Provisioning – documents customer orders for new cross-connects and maintains the cross-connects inventory.

Procedures

Procedures supporting the Data Center Services include:

Physical Security

Digital Realty's physical security policies are set forth in the operations and maintenance guide which is distributed to the Site Management and Security teams at the local data center facilities. Physical security of the building is controlled through limited access points, and physical security of each suite is controlled through a badge and/or biometric reader. Access to master keys is restricted to emergency use only and to personnel from the Security, Engineering, and Site Management teams. New security personnel are required to undergo orientation training and existing security personnel are required to complete annual refresher training course(s).

Visitor Procedures

All visitors are required to check-in with the Security team and must provide valid government-issued photo ID to verify their identity. Visitors must sign-in and provide the name of the Digital Realty/customer individual they will be meeting with. The visitor will either be pre-authorized by the designated Digital Realty or customer host or will be provided escorted access by an authorized customer or Digital Realty representative. Authorized employees and customer personnel are issued a permanent badge. Digital Realty personnel other than authorized employees and strategic partners are granted a temporary badge.

Monitoring

Security personnel monitor both the interior and exterior of the building through closed-circuit TV (CCTV). The data center is under 24-hour recorded CCTV camera surveillance. Cameras are also deployed within the suites and surrounding areas to monitor the security of exits and entrances. The recordings are retained for a minimum of 90 days and may be used for investigative purposes, or as otherwise legally permitted.

Security personnel also monitor card activity for access points to the building and the suites. In the event of any suspicious activity (e.g., a card reader bypass by a master key, a door being held open for an extended time, etc.), the security system initiates an alert and displays the logged event. Security personnel investigate the alert and once the issue is resolved, they record the outcome in the physical security access system.

Incident Response

Security personnel respond to security incidents and involve the appropriate resources (e.g., Digital Realty management, fire department, police, etc.) to achieve resolution. The security incidents are documented in an Incident Report database and reported to Digital Realty Portfolio Security management for their review. High impact security events (i.e., a security breach) are also communicated to impacted employees or customers.

Disaster Recovery

Digital Realty has in place disaster recovery plans for the Data Center Services that address the following:

- Risk identification, evaluation, and scoring
- Personnel assignments and team organization
- Incident response plans
- Contact information for customers, vendors, employees, emergency responders, and recovery partners
- Recovery team's tasks and procedures

Each of the above elements is tested regularly through live exercises of systems and personnel in the course of normal operations. This testing takes the following forms:

- Load testing of UPS and generator systems
- Activation of incident response communications systems to communicate with customers, vendors, employees, emergency responders, and response teams

- Activation of response teams to evaluate and respond to potentially threatening conditions
- Redundant physical access systems and environmental systems infrastructure exercises, including power and cooling systems

In each case noted above, management plans, communications, staff responses and system redundancies are validated to confirm that all perform properly to prevent or mitigate the impact on the data center operations.

Because situations in which Digital Realty has access to customer data are very limited generally and even more so with the defined Services system, back-up procedures for customer data are considered outside the boundaries of this system and are the user entities' responsibilities.

Customer Contact List

For every customer, Digital Realty maintains a list of customer personnel (the "customer contact list") that can approve user account requests. Customers provide up-to-date customer contact lists to Digital Realty Security and Site Management personnel.

User Access Requests and Provisioning

Security personnel will issue badges or grant access (i) to a customer's employees or contractors based on documented approvals obtained from an authorized approver identified in the corresponding customer contact list and (ii) to Digital Realty's employees or contractors based on approvals obtained from Digital Realty's Site Management or Site Engineering team.

User Access Revocation

An individual's access to the building is disabled through the physical security access system upon request by the authorized customer or Digital Realty personnel. Upon the termination of any Digital Realty employee or contractor, Human Resources (HR) sends a notification via the ticketing system that is routed to the physical security access system administrators to disable the employee/contractor access. A confirmation e-mail is sent upon removal and tracked in the ticketing system.

Internal Security Assessment Program

The Portfolio Security Team performs an internal security assessment program annually as part of the "Digital Realty Center of Operational Excellence Program." This quality assurance program consists of three separate assessments: (1) Security Operations Assessment, (2) Operations Assessment, and (3) Property Operations Assessment. As part of the program, the directors of the Site Management team and directors of strategic partners along with each property team evaluate their current operating procedures and address any areas which are inconsistent with standard operating procedures.

Environmental Controls

Environmental controls are maintained by the Site Engineering team. The Site Engineering team for each data center consists of a property Chief Engineer and building engineers. The team reports to the Site Manager. The Site Engineering team uses an online BMS to monitor and control the environmental systems that support the building and the suites. The Site Engineering team tracks alerts through to resolution.

Uninterruptible Power Supply (UPS / Batteries)

UPS systems are in place to ensure uninterrupted power supply in case of a power outage. The current operational state of the UPS systems is monitored by site personnel. Preventative maintenance is performed at least annually.

Computer Room Air Conditioner (CRAC) / Computer Room Air Handler (CRAH)

The CRAC / CRAH systems control and monitor temperature and humidity levels within the building and the suites. The chilling loop system has a cooling capacity greater than the required cooling capacity. The units are monitored and any change in temperature or humidity levels outside of a pre-set threshold triggers an alert that is sent to the Site Engineering team for resolution. Preventative maintenance is performed at least annually.

Fire Suppression; Fire and Smoke Detection

The fire suppression systems are double interlock pre-action systems. These systems require two triggers – a fusible link melting and a signal from the pre-action detection system. Unless both of these triggers are initiated, water does not enter the water mist fire suppression or sprinkler piping system. Fire and smoke detectors and fire extinguishers are present throughout the building and the suites. Preventative maintenance is performed at least annually.

Generators

Generators are in place to support the base building and the suites in an event of a prolonged power failure. The current operational state of each of the generators is monitored by site personnel. Preventative maintenance is performed at least annually.

Data

The data relevant to the in-scope systems include user account information, access lists, and physical and environmental event logs and reports. User account information is submitted through the online customer service system and the request (provisioning/de-provisioning) is executed in the physical security access system. Access to this data is limited to authorized personnel through logical access controls for the in-scope systems and considered as classified information by Digital Realty personnel.

Because situations in which Digital Realty has access to customer data are very limited generally and even more so with the defined Services system, customer data, including data maintained on back-up media or servers, is not included in the scope of this assessment.

The following table describes the data used and supported by the system.

Data Used and Supported by the System		
Data Description	Data Reporting	Classification
Physical security data that include access logs and video surveillance images.	This data is not reported to customers unless required for investigative purposes.	Classified
Environmental security monitoring log data regarding the status of the environmental monitoring systems.		Restricted
Environmental security data that include inspection reports for fire detection, fire suppression, water intrusion, cooling systems, power equipment (UPS, generator, etc.), humidity, etc.		

Significant Changes During the Period

There were no significant changes that are likely to affect report users' understanding of how the in-scope system is used to provide the services covered by this examination during the period.

Subservice Organizations

No subservice organizations were relevant to the scope of this assessment whose controls were necessary, in combination with controls at Digital Realty, to provide reasonable assurance that Digital Realty's service commitments and system requirements were achieved.

Complementary Controls at User Entities

Complementary user entity controls are not required, or significant, to achieve the service commitments and system requirements based on the applicable trust services criteria.

Trust Services Criteria Not Applicable to the In-Scope System

The Trust Services criteria presented below, are not applicable to the Data Center Services system within the scope of this examination. As a result, an associated control is not required to be in place at the service organization for the omitted applicable trust services criteria. The following table presents the trust services criteria that are not applicable for the Data Center Services system at Digital Realty.

Criteria #	Reason for Omitted Criteria
CC6.6 CC6.7	The Digital Realty in-scope systems do not transmit, move, or remove data outside the boundaries of the system and Digital Realty does not administer logical access to systems for user entities.