



# **Payment Card Industry Data Security Standard**

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## **Attestation of Compliance for Report on Compliance – Service Providers**

**Version 4.0.1**

Publication Date: August 2024



# **PCI DSS v4.0.1 Attestation of Compliance for Report on Compliance – Service Providers**

**Entity Name: Digital Realty Trust, Inc. and Digital Realty Trust, L.P.**

**Date of Report as noted in the Report on Compliance: March 31, 2026**

**Date Assessment Ended: March 03, 2026**



## Section 1: Assessment Information

### Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider’s assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* (“Assessment”). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information	
<b>Part 1a. Assessed Entity (ROC Section 1.1)</b>	
Company name:	Digital Realty Trust, Inc. and Digital Realty Trust, L.P.
DBA (doing business as):	
Company mailing address:	2323 Bryan Street, Dallas, TX 75201
Company main website:	www.digitalrealty.com
Company contact name:	Marcy Maxwell
Company contact title:	Senior Director, Global Compliance
Contact phone number:	415.848.9308
Contact e-mail address:	MMaxwell@digitalrealty.com
<b>Part 1b. Assessor (ROC Section 1.1)</b>	
Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.	
PCI SSC Internal Security Assessor(s)	
ISA name(s):	Not applicable.
Qualified Security Assessor	
Company name:	Schellman Compliance, LLC
Company mailing address:	4010 W Boy Scout Boulevard, Suite 600, Tampa, FL 33607
Company website:	https://www.schellman.com/services/pci-compliance
Lead Assessor name:	Jeff Lasker
Assessor phone number:	1.866.254.0000
Assessor e-mail address:	pciocs@schellman.com
Assessor certificate number:	QSA (202-860), PCIP (1006-364)



## Part 2. Executive Summary

### Part 2a. Scope Verification

Services that were **INCLUDED** in the scope of the Assessment (select all that apply):

Name of service(s) assessed:		Colocation Services	
Type of service(s) assessed:			
<b>Hosting Provider:</b> <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input checked="" type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify):	<b>Managed Services:</b> <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	<b>Payment Processing:</b> <input type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):	
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch	
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services	
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management	
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments	
<input type="checkbox"/> Network Provider			
<input type="checkbox"/> Others (specify):			

**Note:** These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.



**Part 2. Executive Summary (continued)**

**Part 2a. Scope Verification (continued)**

**Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply):**

Name of service(s) not assessed:	All other services offered by Digital Realty.
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Type of service(s) not assessed:

<p><b>Hosting Provider:</b></p> <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify):	<p><b>Managed Services:</b></p> <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	<p><b>Payment Processing:</b></p> <input type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> Others (specify):		

Provide a brief explanation why any checked services were not included in the Assessment:	Only the physical security of the data center/colocation services offered by Digital Realty were included within the scope of this assessment.
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**Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1)**

Describe how the business stores, processes, and/or transmits account data.	Digital Realty does not store, process or transmit cardholder data. All access to systems and data are the responsibility of the customers themselves. Digital Realty simply provides secure space, power, and environmental controls for merchants and service providers, some of which fall under PCI compliance. Digital Realty has no logical access to any customer systems that may contain cardholder data. Digital Realty's managed services are not included within the scope of this assessment.
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<p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.</p>	<p>All access to systems that may store, process, or transmit cardholder data are the responsibility of the colocation services customers, including Digital Realty. The in-scope data centers simply provide secure space, power, and environmental controls for merchants and service providers, some of which fall under PCI compliance, including Fastly. The in-scope data centers have no logical access to any customer system that may contain cardholder data.</p>
<p>Describe system components that could impact the security of account data.</p>	<p>Not applicable. The scope of the assessment was limited to the physical security at the in-scope data center facilities and the related policies and procedures.</p>



**Part 2. Executive Summary (continued)**

**Part 2c. Description of Payment Card Environment**

Provide a high-level description of the environment covered by this Assessment.

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

Digital Realty provides colocation services to merchants and service providers, some of which may store, process, or transmit cardholder data and fall under PCI compliance. Digital Realty does not store, process, or transmit cardholder data.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.

(Refer to the “Segmentation” section of PCI DSS for guidance on segmentation)

Yes  No

**Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)**

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)
Colocation Facilities	81	AMS3: Cessnalaan 1-33, 1119 NJ, Schiphol-Rijk, Netherlands AMS5: Tupolevlaan 101, 1119 PA, Schiphol-Rijk, Netherlands AMS7: Cessnalaan 50, 1119 NL, Schiphol-Rijk, Netherlands AMS8: Pudongweg 37, 1437 EM, Rozenburg, Netherlands AMS9: Science Park 121, 1098 XG, Amsterdam, Netherlands AMS10: Pudongweg 25, 1437 EM, Rozenburg, Netherlands ATH1: 76 Ifaistou Street, Koropi, Greece ATH2: 76 Ifaistou Street, Koropi, Greece ATH3: 76 Ifaistou Street, Koropi, Greece BRU1: Wezembeekstraat 2, bus 1, Zaventem, Belgium BRU3: Mercuriusstraat 27, Zaventem, Belgium BRU4: Mercuriusstraat 27, Zaventem, Belgium CPH1: Industriparken 20A, Ballerup, Denmark CPH2: Industriparken 20A, Ballerup, Denmark CPH3: Industriparken 24, Ballerup, Denmark CPHRS: Carl Jacobsens Vej 20, Valby, Denmark DUB1: Unit 35 Lavery Avenue, Parkwest Business Park, Dublin, Ireland DUB2: Unit 24 Hume Avenue, Parkwest Business Park, Dublin, Ireland DUB3: Grange Castle Business Park, Old Nangor Road, Dublin, Ireland DUB4: Grange Castle Business Park, Old Nangor Road, Dublin, Ireland DUS1: In der Steele 25-45, Duesseldorf, Germany DUS2: In der Steele 39-45, Duesseldorf, Germany DUS3: In der Steele 27-43, Duesseldorf, Germany

FRA1: Hanauer Landstrasse 302, Frankfurt am Main, Germany  
 FRA2: Hanauer Landstrasse 304-306, Frankfurt am Main, Germany  
 FRA4: Weismuellerstrasse 19, Frankfurt am Main, Germany  
 FRA5: Hanauer Landstrasse 308-310, Frankfurt am Main, Germany  
 FRA6: Hanauer Landstrasse 300-300a, Frankfurt am Main, Germany  
 FRA7: Hanauer Landstrasse 296a-298, Frankfurt am Main, Germany  
 FRA8: Weismuellerstrasse 36, Frankfurt am Main, Germany  
 FRA9: Weismuellerstrasse 25-27, Frankfurt am Main, Germany  
 FRA10: Weismuellerstrasse 38, Frankfurt am Main, Germany  
 FRA11: Weismuellerstrasse 40, Frankfurt am Main, Germany  
 FRA12: Weismuellerstrasse 29-31, Frankfurt am Main, Germany  
 FRA13: Weismuellerstrasse 42, Frankfurt am Main, Germany  
 FRA14: Weismuellerstrasse 34, Frankfurt am Main, Germany  
 FRA15: Weismuellerstrasse 1, Frankfurt am Main, Germany  
 FRA16: Weismuellerstrasse 37-39, Frankfurt am Main, Germany  
 FRA17: Hugo-Junkers-Strasse 7a, Frankfurt am Main, Germany  
 HER1: Epsilon & Theta Street, Building Block 18, Heraklion, Greece  
 JFK10: 111 8<sup>th</sup> Avenue, New York, NY, 10011, USA  
 JFK12: 60 Hudson Street, New York, NY, 10013, USA  
 JFK13: 32 Avenue of the Americas, New York, NY, 10013, USA  
 LHR26: 630 Ajax Avenue, Slough, UK  
 LHR27: 631 Ajax Avenue, Slough, UK  
 LON1: 11 Hanbury Street, London, UK  
 LON2: Dray Walk, Building 1, 91-95 Brick Lane, London, UK  
 LON3: 1 Spicer Street, Off Dray Walk, London, UK  
 MAD1: Calle Albasanz 71, Madrid, Spain  
 MAD2: Calle Albasanz 73, Madrid, Spain  
 MAD3: Calle Emilio Muñoz 49, Madrid, Spain  
 MAD4: Calle Alfonso Gómez 4, Madrid, Spain  
 MRS1: 40 avenue Roger Salengro, Marseille, France  
 MRS2: Enceinte Portuaire, Porte 4, Marseille, France  
 MRS3: Enceinte Portuaire, Porte 4, Marseille, France  
 MRS4: Enceinte Portuaire, Porte 4, Marseille, France  
 PAR1: 45 avenue Victor Hugo, Bâtiment 260, Aubervilliers, France  
 PAR2: 20-22 rue des Gardinoux, Bâtiment E501, Aubervilliers, France  
 PAR3: 7-9 avenue des Arts et Métiers, Saint-Denis, France  
 PAR4: 21 rue du Port, Parc de l'île - Allée Bleue, Nanterre, France  
 PAR5: 11-13 avenue des Arts et Métiers, Saint-Denis, France  
 PAR6: 11-15 rue de Galilée, Ivry-sur-Seine, France  
 PAR7: 1-3 rue Rateau, La Courneuve, France  
 PAR8: 2-20 avenue Marcel Cachin, La Courneuve, France  
 PAR9: 2-20 avenue Marcel Cachin, La Courneuve, France  
 PAR10: 2-20 avenue Marcel Cachin, La Courneuve, France  
 PAR11: 2-20 avenue Marcel Cachin, La Courneuve, France  
 PAR12: 16 avenue Joseph Froelicher, Ferrières-en-Brie, France  
 PAR13: 14 rue de l'Orme à Moineaux, Les Ulis, France  
 STO1 - STO5: Esbogatan 11, 164 74 Kista, Stockholm, Sweden  
 STO6: Vandagatan 3, 164 74 Kista, Stockholm, Sweden  
 VIE1: Louis-Haefliger-Gasse 10, Vienna, Austria  
 VIE2: Louis-Haefliger-Gasse 10, Vienna, Austria  
 ZAG1: Selska Cesta 93, Zagreb, Croatia  
 ZUR1: Sägereistrasse 35, Glattbrugg, Switzerland  
 ZUR2: Bäulerwisenstrasse 4, Glattbrugg, Switzerland  
 ZUR3: Bäulerwisenstrasse 6, Glattbrugg, Switzerland



**Part 2. Executive Summary** *(continued)*

**Part 2e. PCI SSC Validated Products and Solutions**  
**(ROC Section 3.3)**

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions\*?

Yes  No

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which Product or Solution Was Validated	PCI SSC Listing Reference Number	Expiry Date of Listing
Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.

\* For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components, appearing on the PCI SSC website ([www.pcisecuritystandards.org](http://www.pcisecuritystandards.org)) (for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions), and Mobile Payments on COTS (MPoC) products.



**Part 2. Executive Summary** *(continued)*

**Part 2f. Third-Party Service Providers**  
**(ROC Section 4.4)**

For the services being validated, does the entity have relationships with one or more third-party service providers that:

<ul style="list-style-type: none"> <li>• Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage))</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> <li>• Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and IaaS, PaaS, SaaS, and FaaS cloud providers)</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> <li>• Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**If Yes:**

<b>Name of Service Provider:</b>	<b>Description of Services Provided:</b>
Securitas	Third-party data center security guard services used exclusively at the data centers.

**Note:** Requirement 12.8 applies to all entities in this list.



**Part 2. Executive Summary (continued)**

**Part 2g. Summary of Assessment (ROC Section 1.8.1)**

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either “Not Applicable” or “Not Tested,” complete the “Justification for Approach” table below.

**Note:** One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Colocation Services

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Justification for Approach**



**Part 2. Executive Summary (continued)**

<p>For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.</p>	<p>1.1.1 – 1.5.1, 2.3.1 – 2.3.2, 3.1.1 – 3.7.9, 4.1.1 – 4.2.2, 6.2.1 – 6.2.4, 6.3.2, 6.4.1 – 6.4.3, 6.5.3 – 6.5.6, 7.2.6, 8.2.3, 8.3.10 – 8.3.10.1, 8.4.1 – 8.4.2, 10.2.1.1, 11.2.1 – 11.5.1.1, 11.6.1, 12.10.7: N/A. Based on the scope of services, Digital Realty customers were responsible for complying with these requirements.</p> <p>9.4.1 – 9.4.7: N/A. Digital Realty did not maintain media containing cardholder data. Digital Realty customers were responsible for complying with these requirements.</p> <p>9.5.1 – 9.5.1.3: N/A. Digital Realty did not maintain POI devices. Digital Realty customers were responsible for complying with these requirements.</p> <p>10.7.1: N/A. This requirement has been superseded by Requirement 10.7.2.</p> <p>12.3.2: N/A. The customized approach was not used.</p> <p>A1.1.1 – A1.2.3: N/A. Digital Realty was not a multi-tenant service provider.</p> <p>A2.1.1 – A2.1.3: N/A. Digital Realty did not use SSL/Early TLS or POI terminals.</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>2.1.1 – 2.2.7, 5.1.1 – 5.4.1, 6.1.1 – 6.1.2, 6.3.1, 6.3.3, 6.5.1 – 6.5.2, 7.1.1 – 7.2.5.1, 7.3.1 – 7.3.3, 8.1.1 – 8.2.2, 8.2.4 – 8.3.9, 8.3.11, 8.4.3 – 8.6.3, 10.1.1 – 10.2.1, 10.2.1.2 – 10.6.3, 11.1.1 – 11.1.2, 11.5.2, 12.2.1, 12.3.3 – 12.3.4, 12.5.1: Per Digital Realty request, the operating system related controls of the badge access system were not tested.</p>



## Section 2 Report on Compliance

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**(ROC Sections 1.2 and 1.3)**

Date Assessment began: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>	June 23, 2025
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	March 03, 2026
Were any requirements in the ROC unable to be met due to a legal constraint?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any testing activities performed remotely?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



## Section 3 Validation and Attestation Details

### Part 3. PCI DSS Validation (ROC Section 1.7)

This AOC is based on results noted in the ROC dated *March 31, 2026*.

Indicate below whether a full or partial PCI DSS assessment was completed:

- Full Assessment** – All requirements have been assessed and therefore no requirements were marked as Not Tested in the ROC.
- Partial Assessment** – One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.

Based on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (*select one*):

<input checked="" type="checkbox"/>	<p><b>Compliant:</b> All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall <b>COMPLIANT</b> rating; thereby <i>Digital Realty Trust, Inc. and Digital Realty Trust, L.P.</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>								
<input type="checkbox"/>	<p><b>Non-Compliant:</b> Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall <b>NON-COMPLIANT</b> rating; thereby <i>Digital Realty Trust, Inc. and Digital Realty Trust, L.P.</i> has not demonstrated compliance with PCI DSS requirements.</p> <p><b>Target Date</b> for Compliance: Not applicable.</p> <p>An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.</p>								
<input type="checkbox"/>	<p><b>Compliant but with Legal exception:</b> One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby <i>Digital Realty Trust, Inc. and Digital Realty Trust, L.P.</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.</p> <p>This option requires additional review from the entity to which this AOC will be submitted.</p> <p><i>If selected, complete the following:</i></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met						
Affected Requirement	Details of how legal constraint prevents requirement from being met								



### Part 3. PCI DSS Validation (continued)

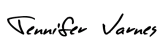
#### Part 3a. Service Provider Acknowledgement

**Signatory(s) confirms:**

(Select all that apply)

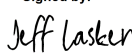
<input checked="" type="checkbox"/>	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects.
<input checked="" type="checkbox"/>	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

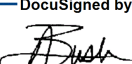
#### Part 3b. Service Provider Attestation

DocuSigned by:  674519367C48492...	
Signature of Service Provider Executive Officer ↑	Date: April 1, 2026
Service Provider Executive Officer Name: Jennifer Varnes	Title: VP, Compliance

#### Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this Assessment, indicate the role performed:	<input checked="" type="checkbox"/> QSA performed testing procedures.
	<input type="checkbox"/> QSA provided other assistance.
If selected, describe all role(s) performed:	

Signed by:  089E85A745F84F1...	
Signature of Lead QSA ↑	Date: April 1, 2026
Lead QSA Name: Jeff Lasker	

DocuSigned by:  4C64E1964742453...	
Signature of Duly Authorized Officer of QSA Company ↑	Date: 4/1/2026
Duly Authorized Officer Name: Adam Bush	QSA Company: Schellman Compliance, LLC

#### Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement

If an ISA(s) was involved or assisted with this Assessment, indicate the role performed:	<input type="checkbox"/> ISA(s) performed testing procedures.
	<input type="checkbox"/> ISA(s) provided other assistance.
If selected, describe all role(s) performed:	



## Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement below. For any “No” responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement	Description of Requirement	Compliant to PCI DSS Requirements (Select One)		Remediation Date and Actions (If “NO” selected for any Requirement)
		YES	NO	
1	Install and maintain network security controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
2	Apply secure configurations to all system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
3	Protect stored account data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
5	Protect all systems and networks from malicious software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
6	Develop and maintain secure systems and software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
7	Restrict access to system components and cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
8	Identify users and authenticate access to system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
9	Restrict physical access to cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
10	Log and monitor all access to system components and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
11	Test security systems and networks regularly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
12	Support information security with organizational policies and programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to part 2g for requirement applicability.

Note: The PCI Security Standards Council is a global standards body that provides resources for payment security professionals developed collaboratively with our stakeholder community. Our materials are accepted in numerous compliance programs worldwide. Please check with your individual compliance accepting organization to ensure that this form is acceptable in their program. For more information about PCI SSC and our stakeholder community please visit: [https://www.pcisecuritystandards.org/about\\_us/](https://www.pcisecuritystandards.org/about_us/)