Data Provider Due Diligence Questionnaire (“DDQ”)

Because investment managers intend to use this data to inform investment decisions for trading public and private securities, they must consider applicable securities laws, as well as other laws, in evaluating data sets. The responses you provide here will likely be material to an investment manager's decision to acquire and use the data product(s).

As a general rule, investment managers do not want to receive data containing and/or derived from the following types of information:

* **Material, non-public information (also known as “MNPI” or “Inside Information”)** (i.e., information that is not widely known and could affect a reasonable investor’s decision to trade);
* **Information that is subject to a confidentiality obligation;**
* **Information that the vendor is prohibited from disclosing**;
* **Information obtained through misappropriation, through deception, in violation of law, or in breach of a duty (whether contractual, fiduciary, or otherwise)**; and
* **Personal Information, Personally Identifiable Information and Personal Data (referred to herein as “Covered Personal Information”)** (i.e.,information that could be used to identify or be associated with individual natural persons).

Definitions

The following definitions apply:

* “Company” means the name of the entity offering the Data.
* “Affiliate” means any entity that controls, is controlled by, or is under common control with the Company.
* “Data” means the information product offered by the Company and, where appropriate, any information used directly or indirectly to create, process, structure, acquire, aggregate, or resell the Data.
  + When the words “information,” “data,” or “data set” are used, without having been capitalized, please interpret them according to their ordinary dictionary meaning.
* “MNPI” and “Inside Information” have the meanings used above.
* “Covered Personal Information” has the meaning used above.

Instructions

Please answer each question in this DDQ, responding with all information available to you and which you believe to be true after performing a reasonable investigation. If you must make an interpretation of any question or any term used within a question, please describe that interpretation as part of your answer.

**Document Request List**

In addition to answering the questions below, please provide the following, if they exist for the Data:

* A document describing the Data, such as a tear sheet, brochure, or other marketing literature
* A data dictionary, data schema, or other document listing the fields provided in the Data and describing the types of values that may be contained within each field
* A small sample of the Data in human-readable form. This sample should contain less than 100 rows of Data. The sample Data should be from more than 3 months ago
* If you buy Data from others, a copy of any relevant terms from your contracts with those persons. These terms should show your legal right to resell or license the Data to us and/or to sell/license newly created (i.e. “derived”) Data products
* If you collect or generate Data from or about individuals or their devices, a copy of any consent or other terms you have entered into with those individuals concerning Data collected from or about them or their devices

|  |  |  |
| --- | --- | --- |
| Company Information | | |
|  | What is the Company’s name? | Click or tap here to enter text. |
|  | Does the Company have a different legal name? | Click or tap here to enter text. |
|  | Company’s principal business/headquarters address: | Click or tap here to enter text. |
|  | Please provide the registered address of the Company if different from its principal business address. | Click or tap here to enter text. |
|  | Years in business: | Click or tap here to enter text. |
|  | Names of any Affiliates, if relevant with respect to the Data: | Click or tap here to enter text. |
|  | Is Company or any Affiliate a regulated entity? | Yes, and details are provided below  No  Click or tap here to enter text. |
|  | Do you model, maintain a “paper book” or otherwise track potential performance of your data product(s) against the public equity markets? If yes, do you publish or share with clients? | Click or tap here to enter text. |
|  | Please describe any formal or informal investment policies the Company maintains concerning its investments or the investments of its employees. | Click or tap here to enter text. |
|  | Does the Company make investments or allow its employees to make investments based on the Data? | Yes, and details are provided below  No  Click or tap here to enter text. |
|  | What is the Company’s website address? | Click or tap here to enter text. |
|  | Name of Executive Relationship Manager, Account Representative, or other primary sales contact: | Click or tap here to enter text. |
|  | Please provide the names of at least two persons who have reviewed the responses to this questionnaire and what function they hold at the Company. If you have a legal or compliance department, at least one person from one of those departments should review these responses. | Click or tap here to enter text. |
|  | Effective date of this questionnaire: | Click or tap here to enter text. |

|  |  |  |
| --- | --- | --- |
| Product/Service Information | | |
| General | | |
|  | What is the name of the Data? Please provide any alternate names that Data may be known by. | Click or tap here to enter text. |
|  | Please describe the Data or provide a description from your data catalogue, tear sheet, or other documentation. | Click or tap here to enter text. |
|  | In what year did the Company begin offering the Data to customers? | Click or tap here to enter text. |
|  | Approximate number of active customers in each category below that the Company provides the Data to:   * Financial services related customers? * Non-Financial services related customers? | Approximate number of financial services related customers:  Choose an item.  Approximate number of non-financial services related customers:  Choose an item. |
|  | Is the Data disseminated simultaneously to all customers? | Yes  No, and explanation is provided below  Click or tap here to enter text. |
|  | Are there any third party dependencies and/or access restrictions to the Data that would impact our receipt and/or use of the Data (e.g., expiration of upstream license agreement(s), anticipated updates to website/app terms of service through which the data is collected, changing privacy regulations (i.e., CPRA)? | Yes, and explanation is provided below  No  Click or tap here to enter text. |
|  | Do you collect or generate the Data yourself, or do you buy or collect the Data from others? If you either buy or collect the Data from others, please provide any relevant Terms & Conditions or Agreements with those persons related to the Data, such as user consents to collection and dissemination of anonymized personal data or terms demonstrating your ability to resell the Data or to create derived Data products. You may redact such agreements as necessary to comply with your confidentiality obligations. | Please provide a brief descriptions of the documents you are providing. You may deliver them by email or any other convenient electronic means. |
| Dataset Information | | |
|  | From which countries/states/clouds are the Data obtained? | Click or tap here to enter text. |
|  | Where are the Data stored? In which countries/states/clouds are the Data stored? | Click or tap here to enter text. |
|  | Please indicate whether any of these data generating or collection methods are used to create the Data: | Web scraping  Apps; browser plugins; from consumers generally  From third party aggregators  IoT devices  Financial transaction/exchange  Government/public sources (please explain)  On-premise data collection (e.g. counting cars in parking lots)  Calls with public companies, expert networks, surveys of companies/indivduals  Satellite/drone/radar collection |
|  | Do you use Generative AI tools (e.g., ChatGPT) in the production of your Data?  "Generative AI" means generative pre-trained transformers and large language models that produce new content in response to a user’s prompts based on the data the models were trained on.  **If yes, please fill out Appendix 4, which refers to “Generative AI”.** | Click or tap here to enter text. |
|  | Who provides the underlying information contained in the Data? | Click or tap here to enter text. |
|  | Please describe any diligence **you perform on the Data** to determine whether the persons or companies providing the underlying information contained in the Data have the legal right to do so? | Click or tap here to enter text. |
|  | Please describe any other due diligence **performed on third-party data suppliers**? | Click or tap here to enter text. |
|  | Does the company have contracts in place with primary data providers? If yes, please provide redacted copies of those contracts. | Yes, and the contracts are provided as described below  No  Please provide a brief descriptions of the documents you are providing. You may deliver them by email or any other convenient electronic means. |

|  |  |  |
| --- | --- | --- |
| MNPI, Covered Personal Information, and Other Issues | | |
| MNPI/Inside Information and Covered Personal Information | | |
|  | Does the Data contain any MNPI or inside information, or is it potentially derived from MNPI or inside information? | Yes, and more details are provided below  No  Click or tap here to enter text. |
|  | Does the Company engage in any activities that involve, or expose it to, MNPI, regardless of whether the Data relating to this request contains or is potentially derived from MNPI? | Yes, and more details are provided below  No  Click or tap here to enter text. |
|  | Does the Data contain or is it derived from any information that is otherwise confidential? For example, your license to the Data is covered by a non-disclosure agreement. | Yes, and more details are provided below  No  Click or tap here to enter text. |
|  | Please describe any diligence you perform on the Data concerning issues surrounding MNPI, inside information, or otherwise confidential information? | Click or tap here to enter text. |
|  | Have you used reasonable best efforts to determine that any data you use to create the Data was not derived from a breach of fiduciary duty, breach of contract or deceptive behavior? And are you reasonably sure the Data does not contain any of the forgoing? | Click or tap here to enter text. |
| Personal Data / PII | | |
|  | Does the Company, or do the third party sources of any underlying Data used by the Company to produce the Data, collect any Covered Personal Information as part of its products and/or services?  **If Yes, please also answer the questions in Appendix 1** | Yes, and more details are provided below  No  Click or tap here to enter text. |
|  | How does the Company identify whether it, or the third party sources of any underlying data used by the Company to produce the Data, collects any Covered Personal Information? | Click or tap here to enter text. |
| Other Issues | | |
|  | Does the Company collect any Data through web scraping or other automated data harvesting (e.g., does the Company deep-link, scrape, crawl or use robots, spiders, or other automated programs, devices, algorithms or methods to collect Data from websites)?  **If yes, please fill out Appendix 2, which refers to these practices as “scraping.”** | Yes  No |
|  | Does the Company collect any Data through the use of Application Programming Interface (“API”) calls or similar techniques?  **If yes, please fill out Appendix 2, which refers to these practices as “scraping.”** | Yes  No |
|  | Does the Company collect Data from mobile devices, such as phones or tablets or collect data about individuals’ digital device usage?  **If yes, please fill out Appendix 3.** | Yes  No |

|  |  |  |
| --- | --- | --- |
| Company Legal and Regulatory Information | | |
| Company’s Internal Legal and Regulatory Controls | | |
|  | Does the Company have a legal department and, if so, how many employees make up the function? | Yes, the number of employees is provided below  No  Please input the number of employees. |
|  | Please provide the name of the Company’s outside counsel, if any, relating to the Data and/or the Company’s data practices more generally. | Click or tap here to enter text. |
|  | Please provide a description of how the legal and compliance aspects of the collection and dissemination of data are managed by the Company. | Click or tap here to enter text. |
|  | Does the Company maintain written policies and procedures regarding the handling sensitive information, including:   * MNPI * Covered Personal Information * Confidential information * Data supplier due diligence, if applicable? | Yes, a description of the policies is provided below  No  Please input a description of the policies maintained by the company. |
| General Data Collection and Data Dissemination | | |
|  | How does the Company ensure it complies with the terms of use of any data source from which data is obtained (e.g., websites, third-party suppliers)? | Click or tap here to enter text. |
|  | Relating to its data collection/use/distribution practices, in the last 5 years, has **the Company** ever?  Please provide additional details, if necessary | Received a cease and desist order  Been sued/notified of alleged claim  Received a subpoena  Been subject to an investigation by a regulator, law enforcement agency, or governmental organization  Other  None of the above  Please click or tap here to provide additional details, if necessary. |
|  | With respect to the **providers of underlying data** used by the Company, and their collection/ use/ distribution practices, is the Company aware whether in the past 5 years, any of those provider have ever? | Received a cease and desist order  Been sued/notified of alleged claim  Received a subpoena  Been subject to an investigation by a regulator, law enforcement agency, or governmental organization  Other  None of the above  Please click or tap here to provide additional details, if necessary. |

Appendices

Please answer the questions in one or more of the appendices below if you were directed to do so by one of the questions in the main body of the questionnaire.

|  |  |  |
| --- | --- | --- |
| Covered Personal Information | | |
|  | Are natural persons provided notice regarding the commercialization of their Covered Personal Information? (either by the Company or by the third-party sources of any data used to produce the Data)? | Yes  No  Not applicable |
|  | Do natural persons provide consent to the commercialization of their Covered Personal Information? | Yes  No  Not applicable |
|  | Please provide copies/links of any relevant, related evidence regarding notice provided to or consent received from natural persons to the Company itself and/or to any third party sources of any underlying data used to produce the Data. | Please describe the evidence you are providing. Evidence may be provided by email, link, or other electronic means. |
|  | Does the Company or any third party sources used to produce the Data employ any de-identification or anonymization processes? | Yes, and more details are provided below  No  Not applicable  Click or tap here to enter text. |
|  | Please describe any diligence you perform on the Data concerning issues surrounding Covered Personal Information or other data protected by privacy laws. This includes not only the Data, but also third party sources of any underlying data, as well as the underlying data provided by those third party sources. In other words, please describe diligence you perform on your data vendors (if any) and the data they provide. | Click or tap here to enter text. |

|  |  |  |
| --- | --- | --- |
| Web Scraping and APIs | | |
|  | Do you use any service providers to assist you in web data collection including proxies, CAPTCHA solutions, third-party scraping providers, or others?  **IF SO, YOUR ANSWERS BELOW INCLUDE BOTH YOUR PRACTICES AS WELL AS THOSE OF THE ABOVE-REFERENCED SERVICE PROVIDERS** | Proxies  CAPTCHA solutions  Third-party scraping providers  Others |
|  | Has the Company considered any industry or other web data collection guidelines including   * The FISD Web Data Collection Guidelines * Investment Data Standards Organization Web Crawling Best Practices * Others?   Please describe how you implement and/or comply with that guidance. | Click or tap here to enter text. |
|  | Does the Company perform any analysis of the terms and conditions of the websites that it scrapes? If so, please describe that analysis. | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Does the Company scrape data from directories or files specified as disallowed in robots.txt? | Yes  No |
|  | Does the Company utilize proxies, including anonymizing proxies? If so, do the proxy providers include information sufficient for scraped websites to contact the Company? | Yes, and details are provided below  No  Click or tap here to provide a description of how and why the Company hides its identity when scraping. |
|  | Does the Company use multiple IP addresses or otherwise anonymize its IP addresses? | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Does the Company use onion routing in connection with its scraping activities? | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Does the Company collect data from websites that require an affirmative action to access the data (e.g., checking a box to accept its terms and conditions, providing a user identification and/or password, completing a CAPTCHA or completing a similar verification mechanism)? | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Are the websites from which the Company scrapes able to identify and contact the Company? | Yes  No  Click or tap here to provide additional details. |

|  |  |  |
| --- | --- | --- |
| Digital Device/Mobile Data | | |
|  | Does the Company monitor, or is the Data or underlying data obtained by monitoring, the browsing habits of individuals? | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Does the Company process, or is the Data or underlying data obtained by processing, geolocation data from individuals’ digital devices? | Yes, and details are provided below  No  Click or tap here to provide additional details. |
|  | Does the Company process, or is the Data or underlying data obtained by processing, data from Apple or Android mobile devices?  If so, please provide details of steps the Company takes to ensure its practices conform to development guidelines and/or the legal requirements of the relevant application platform. | Apple device data  Android device data  Click or tap here to provide details of steps taken to ensure that the Company’s practices conform to all relevant development guidelines and/or legal requirements. |

|  |  |  |
| --- | --- | --- |
| Generative AI | | |
|  | What is/are the name(s) of the Generative AI tool(s) you use in the production of your Data? |  |
|  | Is/are the Generative AI tool(s) the public version of such tool(s) (which, for clarity, includes any public version of a Generative AI tool as well as any other version of a Generative AI tool (even if not public) where your inputs could be shared with third parties or used to train the model), or the internal version of such tool(s)? |  |
|  | How are Generative AI tool(s) used in the production of your Data? |  |
|  | Do you input into the Generative AI tool(s) any: PII, PHI, MNPI, confidential information, or intellectual property-protected information?  If yes:  Please explain, and please also provide information relating to any controls in place around those inputs. |  |
|  | Do you review the output for accuracy and/or bias, as applicable?  If yes:  Please describe and provide any related policies or procedures. |  |
|  | Please describe how the Generative AI tool was trained, where the training data set came from and how it works. |  |
|  | Are the Generative AI tools trained on any:  (a) customer data and/or any other, underlying data subject’s or end user’s data?  (b) data licensed from a third party?  If yes:  Please explain, including details of any diligence performed on the training data to determine whether the persons or companies providing the underlying information training the Generative AI tool have the legal right to do so. To the extent applicable, please provide a copy of any disclosures/consents/licensing language from the relevant contract, arrangement or terms of service (subject to reasonable redaction of sensitive and irrelevant information) related to such data. |  |