

Data Provider Due Diligence Questionnaire (“DDQ”)

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

- **Material, non-public information (also known as “MNPI” or “Inside Information”).** As a general matter, these terms refer to information about a public company, political intelligence, and other market impactful information that is not widely known and could affect a reasonable person’s decision to trade;
- **Information that is subject to a confidentiality obligation;**
- **Information that the vendor is prohibited from disclosing;** and
- **Personal Information, Personally Identifiable Information and Personal Data (“PII”)** (This includes national identifiers, such as Social Security Numbers, names, phone numbers, IP addresses, device IDs, online identifiers, account numbers and any other information that could be used to identify or be associated with individual natural persons.)

This is because investment managers globally are subject to numerous state (in the U.S.), national and international laws, including prohibitions against trading while in possession of MNPI (i.e. “insider trading”) and rules on the processing of personal information. In addition, investment managers respect the legal rights of data owners and want to acquire data only from parties that are authorized to provide it. Finally, in addition to being subject to privacy and other rules on processing PII, PII is irrelevant to the analysis of data for investment purposes and, therefore, it is something which is generally avoided.

DEFINITIONS AND INSTRUCTIONS

Please answer each question below, responding with all information available to you and which you believe to be true after performing a reasonable investigation. Please make efforts to answer questions fully, as incomplete answers will require follow-up. 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. To the extent necessary, you may interpret a question about the Company as including the Company’s Affiliates, but please indicate in your explanation when you are doing so.

When reading the questions below, please consult the below definitions:

- “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 the Data. For the purposes of this definition, “create” shall mean produce, put together, process, structure, acquire, resell, aggregate, and all similar activities.
 - When the words “information,” “data,” or “dataset” are used, without having been capitalized, please interpret them according to their ordinary dictionary meaning.
- “MNPI” and “Inside Information” have the meanings used above.
- “PII” has the meaning used above, and includes all personal information, personally identifiable information, and personal data.

Finally, in addition to answering the questions below, please provide the following documentation. You may provide this documentation via email or by providing hyperlinks to documents:

- Any marketing materials that are relevant to the Data.
- A data dictionary, header file(s), and any other documents describing the fields or other information contained in the Data.
- A sample that includes all fields contained in the Data. Please also ensure that the content of the sample is representative of the Data. Depending on the Data, such a sample may be 1,000 rows of data or a single day’s worth of data. Please ensure the sample data provided is from at least one month ago.

1 COMPANY INFORMATION

1.1	What is the Company's name?	90 West Data, LLC
1.2	Does the Company have a different legal name?	No
1.3	Company's principal business/headquarters address?	1300 East 9 th Street Suite 1650 Cleveland, OH 44114
1.4	Is the registered address of the Company different from its principal business address?	No
1.5	What is the Company's registration number? (if applicable)	Click or tap here to enter text.
1.6	Approximate number of employees?	<5
1.7	Years in business?	<1
1.8	Names of any Affiliates, if relevant with respect to the Data:	N/A
1.9	Is Company or any Affiliate a regulated entity?	<input type="checkbox"/> Yes, and details are provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
1.10	Does the Company make investments or allow its employees to make investments in companies about which the data pertains?	<input type="checkbox"/> Yes, and details are provided below <input checked="" type="checkbox"/> No Employees are prohibited from trading securities listed on the "tracked securities" list.
1.11	Does the Company make investments or allow its employees to make investments based on the Data?	<input type="checkbox"/> Yes, and details are provided below <input checked="" type="checkbox"/> No Employees are prohibited from trading securities listed on the "tracked securities" list.
1.12	What is the Company's website address?	www.90westdata.com
1.13	Name of Executive Relationship Manager	John Farrall
1.14	Email address and phone number of Executive Relationship Manager	jfarrall@90westdata.com 216-577-3618

2 Product/Service Information

2.1 GENERAL

2.1.1	What is the name of the Data. Please provide any alternate names that Data may be known by.	"90 West consumer transaction panel" "Panel A" "Panel B"
2.1.2	Please describe the Data.	US consumer transaction data
2.1.3	In what year did the Company begin offering the Data to customers.	2020
2.1.4	Approximate number of active customers in each category below that the Company provides the Data to: <ul style="list-style-type: none"> Financial services related customers? Non-Financial services related customers? 	Approximate number of financial services related customers: 1-5 Approximate number of non-financial services related customers: 0
2.1.5	Is the Data disseminated simultaneously to all customers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, and explanation is provided below: We plan to offer the data and reports with varying degrees of frequency (Daily, Weekly, Monthly). For each level of frequency the data or report will be delivered or accessible simultaneously.
2.1.6	Are there any access restrictions to the Data that would impact our use of the Data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No, and explanation is provided below: There are no access restrictions to the data we offer to clients.

2.1.7	Please provide any relevant Terms & Conditions/Draft Agreement with respect to the Data. You may redact such documents as necessary to comply with your confidentiality obligations.	Documents attached include redacted sections from licensing agreement between 90 West and its data partner along with the redacted agreement between our data partner and its financial institution clients. These sections outline the permissible use of the data. There are also sample data privacy policies utilized by the financial institutions outlining their rights with regard to using the data.
2.2 DATASET INFORMATION		
2.2.1	From which jurisdictions are the Data obtained?	United States
2.2.2	Where are the Data stored?	AWS
2.2.3	Please describe how the Data are obtained.	We have an exclusive partnership with Segmint (www.segmint.com). Segmint is in the business of aggregating, processing and contextualizing bank data to help their bank clients more effectively market to their customers. Segmint aggregates the data from their multiple bank clients and provides that data to 90 West.
2.2.4	Who provides the underlying information contained in the Data?	The underlying data comes from banking institutions.
2.2.5	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.	We have documented permissible use throughout the data chain via the licensing agreement and privacy policies. We also were provided with a legal review with regard to the permissible use outlined in the licensing agreements.
2.2.6	Does the company have contracts in place with primary data providers? If yes, please provide redacted copies of those contracts.	<input checked="" type="checkbox"/> Yes, and the contracts are provided as described below <input type="checkbox"/> No 90 West's contract with Segmint is attached.
2.2.7	Please describe any other due diligence performed on third-party data suppliers?	90 West only gets data from Segmint. Segmint has completed SOC II testing, find the document attached.

3 MNPI, PII, and Other Issues

3.1 MNPI/INSIDE INFORMATION

3.1.1	Does the Data contain any MNPI or inside information?	<input type="checkbox"/> Yes, and more details are provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
3.1.2	Does the Data contain any information that is otherwise confidential?	<input type="checkbox"/> Yes, and more details are provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
3.1.3	Please describe any diligence you perform on the Data concerning issues surrounding MNPI, inside information, or otherwise confidential information.	Per our agreement with Segmint, they will not send 90 West data that would be considered confidential. The data itself represents <2% of total sales for any merchant in the panel.

3.2 PERSONAL DATA / PII

3.2.1	Does the Company collect any personally identifiable information ('PII') or other personal data as part of its products and/or services?	<input type="checkbox"/> Yes, and more details are provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
3.2.2	How does the Company identify whether it collects any PII and/or personal data?	Per our agreement with Segmint, they will not send 90 West data that would be considered PII and/or personal data. Segmint also does not received PII from their bank clients. The data we receive is aggregated at the merchant level.
3.2.3	Are natural persons provided notice regarding the commercialization of their PII? (Either by the Company or by a third-party data provider)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
3.2.4	Do natural persons provide consent to the commercialization of their PII?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable

3.2.5	Please provide copies/links of any relevant, related evidence regarding notice provided to or consent received from natural persons.	N/A
3.2.6	Does the Company employ any de-identification or anonymization processes?	<input type="checkbox"/> Yes, and more details are provided below <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable Click or tap here to enter text.
3.2.7	Please describe any diligence you perform on the Data concerning issues surrounding PII or other data protected by privacy laws.	N/A
3.3 OTHER ISSUES		
3.3.1	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 1, which refers to these practices as “scraping.”	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.3.2	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 2.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

4 COMPANY LEGAL AND REGULATORY INFORMATION

4.1 COMPANY’S INTERNAL LEGAL AND REGULATORY CONTROLS

4	Does the Company have a legal department and, if so, how many employees make up the function?	<input type="checkbox"/> Yes, the number of employees is provided below <input checked="" type="checkbox"/> No Please input the number of employees.
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4	Please provide a description of how the legal aspects of the collection and dissemination of data is managed by the Company.	90 West has utilized the law firm McDonald Hopkins with a practice in Data Security and Transaction Cards to review the license and agreements pertaining to the permissible use of the data.
4	Does the Company have a compliance department and, if so, how many employees make up the function?	<input type="checkbox"/> Yes, the number of employees is provided below <input checked="" type="checkbox"/> No Please input the number of employees.
4	If the Company has no compliance department, please provide a description of how the compliance aspects of the collection and dissemination of the data is managed by the Company.	Both Founders of 90 West Data have decades of experience in traditional sell side research roles, including research supervisory roles. The founders have documented the relationship with their sole data provider (Segment) and have documented the handling of data at 90 West to ensure compliance with any rules or regulations. In addition, 90 West has retained legal counsel and data security consultants to provide policy guidance with regard to the data.
4	Does the Company maintain written policies and procedures regarding the handling sensitive information, including: <ul style="list-style-type: none"> • MNPI • PII or other personal data • Confidential information 	<input checked="" type="checkbox"/> Yes, a description of the policies is provided below <input type="checkbox"/> No Although not a broker dealer or registered investment adviser, 90 West's policies follow those as laid out in the SEC's code of ethics for Investment Advisers: https://www.sec.gov/Archives/edgar/data/1356115/000119312517258663/d434833dex99r2.htm

4.2 GENERAL DATA COLLECTION AND DATA DISSEMINATION

4	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)?	90 West gets data solely from Segmint. Our agreement with Segmint ensures compliance with terms of use throughout the chain of data control.
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4	<p>Relating to its data collection/use/distribution practices, in the last 5 years, has the Company</p> <ul style="list-style-type: none"> • Ever received a cease and desist order? • Been sued or notified of an alleged claim? • Received a subpoena? • Been subject to any investigations by a regulator, law enforcement agency or governmental organization, other than routine regulatory examinations? <p>Please provide additional details, if necessary</p>	<div> <input type="checkbox"/> Cease and Desist <input type="checkbox"/> Sued/Notified of Alleged Claim <input type="checkbox"/> Subpoena <input type="checkbox"/> Non-Routine Investigation </div> <p>Please click or tap here to provide additional details, if necessary.</p>
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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.

1 WEB SCRAPING		
1.1	Does the Company perform any analysis of the terms and conditions of the websites that it scrapes? If so, please describe that analysis.	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.
1.2	Does the Company scrape data from directories or files specified as disallowed in robots.txt?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.3	Does the company hide its identity when scraping?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide a description of how and why the Company hides its identity when scraping.
1.4	Does the company use multiple IP addresses or otherwise anonymize its IP addresses?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.
1.5	Does the company use onion routing in connection with its scraping activities?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.
1.6	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)?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.

2 DIGITAL DEVICE/MOBILE DATA

2.1	Does the company monitor the browsing habits of individuals?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.
2.2	Does the company process geolocation data from individuals' digital devices?	<input type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No Click or tap here to provide additional details.
2.3	<p>Does the company process data from Apple or Android mobile devices?</p> <p>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.</p>	<input type="checkbox"/> Apple device data <input type="checkbox"/> 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.