

# 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?	Tiki Inc.
1.2	Does the Company have a different legal name?	No
1.3	Company's principal business/headquarters address?	1814 Hayes Street, Nashville, TN, 37203, USA.
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)	Redacted
1.6	Approximate number of employees?	10
1.7	Years in business?	3
1.8	Names of any Affiliates, if relevant with respect to the Data:	NA
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 Click or tap here to enter text.
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 Click or tap here to enter text.
1.12	What is the Company's website address?	www.mytiki.com
1.13	Name of Executive Relationship Manager	Barry O'Connor
1.14	Email address and phone number of Executive Relationship Manager	<a href="mailto:barry@mytiki.com">barry@mytiki.com</a> 615-657-7475

## 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.	Tiki Data
2.1.2	Please describe the Data.	A large dataset comprised of retail and transaction data.
2.1.3	In what year did the Company begin offering the Data to customers.	2023
2.1.4	<p>Approximate number of active customers in each category below that the Company provides the Data to:</p> <p><input type="checkbox"/> Financial services related customers?</p> <p><input type="checkbox"/> Non-Financial services related customers?</p>	<p>Approximate number of financial services related customers:</p> <p>1-5</p> <p>Approximate number of non-financial services related customers:</p> <p>1-5</p>
2.1.5	Is the Data disseminated simultaneously to all customers?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No, and explanation is provided below:</p> <p>Click or tap here to enter text.</p>
2.1.6	Are there any access restrictions to the Data that would impact our use of the Data?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No, and explanation is provided below:</p> <p>Data is disseminated in the form of unique cleanrooms, where all accessible data is pre-qualified for the business's use case(s). In rare circumstances, expanding the scope of the cleanroom may require additional approval by data suppliers.</p>

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.	<p>Each cleanroom contains a data provenance audit trail and all corresponding legal agreements.</p> <p>The templates for these legal agreements can be found here:</p> <p><a href="https://mytiki.com/docs/guidelines">https://mytiki.com/docs/guidelines</a></p> <p><a href="https://mytiki.com/docs/udla-template">https://mytiki.com/docs/udla-template</a></p>
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2.2 DATASET INFORMATION		
2.2.1	From which jurisdictions are the Data obtained?	USA
2.2.2	Where are the Data stored?	AWS (S3)
2.2.3	Please describe how the Data are obtained.	<p>Data is obtained directly and explicitly from end-users (zero-party) in exchange for fair compensation. This happens via one of two methods:</p> <p>1) Businesses use Tiki's SDKs within their products to collect/enforce consent and capture data, directly submitting it our cloud APIs.</p> <p>2) Businesses that already collect permissioned/zero-party data direct from users provide regular batch updates from their backend system to ours.</p>
2.2.4	Who provides the underlying information contained in the Data?	End users
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.	<ol style="list-style-type: none"> <li>1. We audit all relevant third party data contracts, agreements, terms of service, and privacy policies for compliance.</li> <li>2. All SDK users sign an agreement stating they have a legal right to provide the data.</li> <li>3. Each data capture tool/source is audited, and sanitized where necessary to ensure strict compliance.</li> </ol>
2.2.6	Does the company have contracts in place with primary data providers? If yes, please provide redacted copies of those contracts.	<p><input checked="" type="checkbox"/> Yes, and the contracts are provided as described below</p> <p><input type="checkbox"/> No</p> <p>Contact <a href="mailto:barry@mytiki.com">barry@mytiki.com</a> for access.</p>
2.2.7	Please describe any other due diligence performed on third-party data suppliers?	In addition to providing templated legal agreements and language, we monitor and sanitize supplier data for conformance

### 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.	We only accept and work with end-user/consumer data. We do not allow business information, proprietary, confidential, or otherwise.

#### 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 checked="" type="checkbox"/> Yes, and more details are provided below <input type="checkbox"/> No  We allow certain data sources/suppliers to provide PII data with explicit user consent. However, all PII data is removed by default, prior to purchasing a cleanroom. Access to PII data requires additional approval from Tiki inc. and a thorough evaluation of the purchasers specific usecase.
3.2.2	How does the Company identify whether it collects any PII and/or personal data?	We maintain strictly enforced data schemas and only accept data that complies with these schemas. Each schema field can contain potential PII data, is flagged, documented, and routinely reviewed by our team. These fields do not propagate to cleanrooms. They are 100% removed, opposed to redaction/sanitization.

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
3.2.4	Do natural persons provide consent to the commercialization of their PII?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input 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.	If PII data is provided, it must be clearly defined in the signed user agreement ( <a href="https://mytiki.com/docs/udla-template">https://mytiki.com/docs/udla-template</a> ).
3.2.6	Does the Company employ any de-identification or anonymization processes?	<input checked="" type="checkbox"/> Yes, and more details are provided below <input type="checkbox"/> No <input type="checkbox"/> Not Applicable  All data is deidentified by default and optionally, at customer request may be anonymized using techniques such as differential privacy.
3.2.7	Please describe any diligence you perform on the Data concerning issues surrounding PII or other data protected by privacy laws.	All PII sources require additional audits by Tiki for both legal and platform (Apple/Google/etc.) compliance.
<b>3.3 OTHER ISSUES</b>		
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)?  <b>If yes, please fill out Appendix 1, which refers to these practices as “scraping.”</b>	<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?  <b>If yes, please fill out Appendix 2.</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 4 COMPANY LEGAL AND REGULATORY INFORMATION

### 4.1 COMPANY'S INTERNAL LEGAL AND REGULATORY CONTROLS

4.1.1	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.
4.1.2	Please provide a description of how the legal aspects of the collection and dissemination of data is managed by the Company.	Tiki provides infrastructure for the fair, transparent, and legal exchange of consumer data.  Compliant collection and dissemination is built into the foundation of our technology.  Tiki only works with consumer data, that is explicitly and directly licensed from the end-user (who's data it is) who willingly opted-in (not out) of the program in exchange for fair compensation.  Agreements undergo thorough legal review. All data is continuously monitored for compliance, and agreement terms are enforced prior to any data becoming available in a cleanroom.
4.1.3	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.



4.1.4	<p>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.</p>	<p>Our entire business is data compliance, there is not a single department — it's the whole company.</p> <p>We create infrastructure for the compliant exchange of consumer data. Our infrastructure is 100% open source, for review not just by our security, privacy, and legal counsel, but yours as well.</p>
4.1.5	<p>Does the Company maintain written policies and procedures regarding the handling sensitive information, including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> MNPI</li> <li><input type="checkbox"/> PII or other personal data</li> <li><input type="checkbox"/> Confidential information</li> </ul>	<p><input checked="" type="checkbox"/> Yes, a description of the policies is provided below</p> <p><input type="checkbox"/> No</p> <p><a href="https://mytiki.com/page/privacy">https://mytiki.com/page/privacy</a></p> <p><a href="https://mytiki.com/docs/user-data-license-agreement">https://mytiki.com/docs/user-data-license-agreement</a></p> <p><a href="https://mytiki.com/docs/guidelines">https://mytiki.com/docs/guidelines</a></p> <p><a href="https://mytiki.com/page/terms">https://mytiki.com/page/terms</a></p>
<h2>4.2 GENERAL DATA COLLECTION AND DATA DISSEMINATION</h2>		
4.2.1	<p>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)?</p>	<p>First, we maintain strict curated data schemas to disallow data that does not meet the terms of use.</p> <p>Second, all data contains a provenance audit trail with corresponding legal agreements, which are continuously monitored and enforced prior to data availability to purchasers.</p>

4.2.2	<p>Relating to its data collection/use/distribution practices, in the last 5 years, has the Company</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Ever received a cease and desist order?</li> <li><input type="checkbox"/> Been sued or notified of an alleged claim?</li> <li><input type="checkbox"/> Received a subpoena?</li> <li><input type="checkbox"/> Been subject to any investigations by a regulator, law enforcement agency or governmental organization, other than routine regulatory examinations?</li> </ul> <p>Please provide additional details, if necessary</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Cease and Desist</li> <li><input type="checkbox"/> Sued/Notified of Alleged Claim</li> <li><input type="checkbox"/> Subpoena</li> <li><input type="checkbox"/> Non-Routine Investigation</li> </ul> <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 checked="" type="checkbox"/> No <a href="#">Click or tap here to provide additional details.</a>
1.2	Does the Company scrape data from directories or files specified as disallowed in robots.txt?	<input type="checkbox"/> Yes <input checked="" 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 <a href="#">Click or tap here to provide a description of how and why the Company hides its identity when scraping.</a>
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 <a href="#">Click or tap here to provide additional details.</a>
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 <a href="#">Click or tap here to provide additional details.</a>
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 <a href="#">Click or tap here to provide additional details.</a>

## 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 checked="" type="checkbox"/> No <a href="#">Click or tap here to provide additional details.</a>
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 <a href="#">Click or tap here to provide additional details.</a>
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 <a href="#">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.</a>