CME Group

Information Policy Requirements for Entitlement Systems

This document forms part of CME's Information Policies and includes the minimum requirements for entitlement systems used as part of Internal Controls. Please note that unless otherwise defined herein, any capitalized terms shall have the same meaning as set out in the Information License Agreement.

Pursuant to the terms of the Information License Agreement, CME requires all Licensee Group and Subscriber Group entities to have and to maintain, at all times, effective Internal Controls and, as part of having effective Internal Controls, Licensee Group and Subscriber Group, must use an entitlement system. An entitlement system is part of effective Internal Controls, that manage entitlement, access, and distribution of Information. In addition to facilitating compliance with the Information License Agreement and Subscriber Agreement, entitlement systems must maintain accurate records for audit purposes, for the most recent five (5) year period. These systems should form the basis of your monthly reports required under the Information License Agreement and Subscriber Agreement/Addendum.

What does an entitlement system do?

Entitlement systems acceptable to CME, must be able to monitor and control the downstream flow of Information from each data feed access point to all applications, the application users, and recipient Devices within Licensee Group and Subscriber Group. These systems must ensure that only those applications, the application users, and their Devices that are entitled and licensed to receive the Information can do so. There should be no feed-based access to Information that is not governed by effective entitlement system controls.

Types of entitlement systems

Licensee Group and Subscriber Group may use either a proprietary entitlement system or a third-party system provided by a data vendor or software provider.

Below is a list of the most common entitlement system configurations, however this is not an exhaustive list:

- **Proprietary entitlement system**

  The Licensee Group or Subscriber Group develops and maintains an in-house system that controls, monitors, and reports the ability to access Information.

- **Data distributor/third party – On-site service**

  A CME licensed data provider develops and maintains a system and deploys it on-site at the Licensee Group or Subscriber Group. The Licensee Group or Subscriber Group is responsible for administrating the system that controls, monitors, and reports all ability to access Information.

- **Hosted/managed – Off-site**
  An administrative team at the CME licensed data provider, hosts and manages the ability to access Information for the Licensee Group or Subscriber Group. In this setup, internal procedures at the data provider are required to control, monitor, and report Licensee Group or Subscriber Group ability to access Information.

Downstream entitlement systems

All entitlement systems sit downstream from the source of Information. CME appreciates that firms have different configurations of their entitlement systems at varying levels of the Information distribution (internal and/or external). All systems involved in any stage of the distribution of Information should meet the entitlement system requirements described in the next section.

Entitlement system requirements

Entitlement systems must be deployed in all Licensee Group and Subscriber Group entities and be capable of controlling all ability to access Information. Information deployed on all Services must be entitled on an approved Unit of Count basis. The entitlement system must maintain logs of all entitlement activity, including changes to each Unit of Count, with both the date and timestamp of the change.

An "Access ID" is a unique authentication identifier for each point of access to Information on a Device. Access IDs are typically used in combination with a password and supplied to a firm's downstream applications and users of those applications. An application user may have multiple accesses to the same information via different Services, each of which must be recorded and reported to CME for the assessment of applicable fees. Licensee Group and Subscriber Group must keep such logs/audit trail records for the most recent five (5) year period.

An entitlement system must record the following information for monthly reporting purposes and such information must be made available to CME during an audit:

- Access IDs and corresponding unique users associated with each Unit of Count that has the ability to access the Information during each required reporting period.

- The corresponding Service (as defined in the information License Agreement) through which the Information was made available to the Units of Count.

- How each Unit of Count is configured to access the Information e.g., was a Device configured to simply display the Information or use the Information in some non-display functionality.

- How each entitlement code (used to entitle each Unit of Count) is configured as to explicitly permit or restrict access to specific Information, based on the licensed product groups. A product group can be a full Designated Contact Market ("DCM"), a sub-set of instruments of Information related to a specific DCM, such as "E-mini".

- The distribution timing (such as, Real-Time, Delayed, Historical etc) of the Information by each Unit of Count.

- In the case of a Quote Unit of Count, the entitlement system must retain records of each Quote request made, per reporting period.

- The entitlement activation and deactivation date for each Unit of Count (along with the Access ID for that Unit of Count) and corresponding Information licensed to each Unit of Count.

- Where the entitlement system is configured, so that an Access ID has concurrent entitlement to access Information through multiple Units of Count, then such entitlement system must capture the Access ID, the number of concurrent entitlements relating to that Access ID and the date any change was made to the number of concurrent entitlements.

- If applicable, identify Devices that are entitled to Subscribers, who are qualified as Non-Professional.

- Location ID/Site ID of each Data Feed.

Administrative records such as invoices for payment of services are not an acceptable form of evidence of entitlement and

access to Information for audit purposes.

If Licensee Group or Subscriber Group is unable to demonstrate Internal Controls or records of entitlement, CME will assess applicable fees for all Units of Count that are capable of accessing Information via data feeds.

Effective entitlement systems and supporting processes will enable Licensee Group and Subscriber Group to comply with data licensing requirements and reduce operational, commercial, and other risks associated with insufficient Internal Controls for the distribution and access to Information.

CME reserves the right to refuse or terminate access to Information, if Internal Controls are determined to be inadequate.