



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

1 COMPANY INFORMATION

1.1	What is the Company's name?	Tracenable
1.2	Does the Company have a different legal name?	Datacie Ltd
1.3	Company's principal business/headquarters address:	Chemin Erna Hamburger 1c, EPFL Innovation Park, 1015 Lausanne
1.4	Please provide the registered address of the Company if different from its principal business address.	/
1.5	Years in business:	Since May 11 th , 2020
1.6	Names of any Affiliates, if relevant with respect to the Data:	/
1.7	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.
1.8	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?	No
1.9	Please describe any formal or informal investment policies the Company maintains concerning its investments or the investments of its employees.	The Company does not make investments or allow its employees to make investments based on the Data.
1.10	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.
1.11	What is the Company's website address?	https://tracenable.com
1.12	Name of Executive Relationship Manager, Account Representative, or other primary sales contact:	Robin Slomian
1.13	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.	Robin Slomian, CEO Timothée Savoy, CTO
1.14	Effective date of this questionnaire:	27/11/2024

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.	<p>We currently commercialize access to three products of Data:</p> <ul style="list-style-type: none"> • Greenhouse Gas Emissions Data • Climate Targets & Commitments Data • EU Taxonomy Data
-------	---	---

2.1.2	Please describe the Data or provide a description from your data catalogue, tear sheet, or other documentation.	<p>Greenhouse Gas Emissions Data:</p> <p>Comprehensive dataset capturing the carbon footprint of global companies, detailing total direct (Scope 1), indirect (Scope 2), and value chain (Scope 3) emissions. Each category is further broken down by specific sources and includes emissions intensity data per unit of revenue, asset or per employee, providing a thorough analysis of climate impact.</p> <p>Climate Targets & Commitments Data</p> <p>Detailed dataset capturing global corporate commitments to reducing greenhouse gas emissions. It includes both absolute and intensity-based reduction targets across publicly listed companies worldwide. Fully standardized and exceptionally granular, our data spans over 200 'as reported' intensity metrics, standardized into 28 comparable sub-categories, offering a comprehensive view of each company's pledged environmental impact and enabling unparalleled cross-company comparisons, surpassing the standards set by the SBTi or CDP.</p> <p>EU Taxonomy Data</p> <p>Comprehensive dataset covering all EU Taxonomy metrics reported by non-financial undertakings subject to the Non-financial Reporting Directive (NFRD). It meticulously details both alignment (A1) and eligibility (A2, A) metrics across companies' reported turnover, OPEX, and CAPEX, offering both aggregate and precise activity-level insights. Fully standardized and continuously updated, our dataset adheres rigorously to the specifications of the Commission Delegated Regulation (EU) 2023/2486, ensuring you receive the most reliable EU Taxonomy data available.</p>
2.1.3	In what year did the Company begin offering the Data to customers?	2021
2.1.4	<p>Approximate number of active customers in each category below that the Company provides the Data to:</p> <ul style="list-style-type: none"> • Financial services related customers? • Non-Financial services related customers? 	<p>Approximate number of financial services related customers:</p> <p>6-10</p> <p>Approximate number of non-financial services related customers:</p> <p>6-10</p>

2.1.5	Is the Data disseminated simultaneously to all customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No, and explanation is provided below Click or tap here to enter text.
2.1.6	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)?	<input type="checkbox"/> Yes, and explanation is provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
2.1.7	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.	We collect the Data ourselves.
2.2 DATASET INFORMATION		
2.2.1	From which countries/states/clouds are the Data obtained?	Worldwide countries
2.2.2	Where are the Data stored? In which countries/states/clouds are the Data stored?	The data is securely stored on servers hosted by major cloud providers, including AWS and GCP. These servers are distributed across various regions worldwide, ensuring reliability, scalability, and compliance with regional data regulations.

2.2.3	Please indicate whether any of these data generating or collection methods are used to create the Data:	<input checked="" type="checkbox"/> Web scraping <input type="checkbox"/> Apps; browser plugins; from consumers generally <input type="checkbox"/> From third party aggregators <input type="checkbox"/> IoT devices <input type="checkbox"/> Financial transaction/exchange <input checked="" type="checkbox"/> Government/public sources (please explain) <input type="checkbox"/> On-premise data collection (e.g. counting cars in parking lots) <input type="checkbox"/> Calls with public companies, expert networks, surveys of companies/individuals <input type="checkbox"/> Satellite/drone/radar collection
2.2.4	Who provides the underlying information contained in the Data?	The companies themselves
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?	The Data we collect is sourced directly from publicly available corporate materials, including company websites and official corporate disclosures. Since this information is published by the companies themselves, we ensure that it is publicly accessible.
2.2.6	Please describe any other due diligence performed on third-party data suppliers?	We carefully review the terms and conditions of all third-party data suppliers to ensure they are fully aligned with our own client agreements. This process involves verifying that the data suppliers operate in compliance with applicable laws and that their terms allow for the lawful collection, use, and distribution of the data. By aligning supplier terms with our contractual obligations to clients, we ensure that the data we provide is sourced ethically and transparently, minimizing any potential risks to compliance or integrity.
2.2.7	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 https://twelvedata.com/terms

3 MNPI, Covered Personal Information, and Other Issues

3.1 MNPI/INSIDE INFORMATION AND COVERED PERSONAL INFORMATION

3.1.1	Does the Data contain any MNPI or inside information, or is it potentially derived from 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 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?	<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	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.	<input type="checkbox"/> Yes, and more details are provided below <input checked="" type="checkbox"/> No Click or tap here to enter text.
3.1.4	Please describe any diligence you perform on the Data concerning issues surrounding MNPI, inside information, or otherwise confidential information?	Our data collection process is designed to ensure that only publicly available information is used. We source data directly from corporate websites, official corporate disclosures, and other publicly accessible and legally obtained sources. Our strict adherence to sourcing protocols minimizes any risk of including MNPI, inside information, or otherwise confidential information in the Data.
3.1.5	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?	Yes, we use reasonable best efforts to ensure that the Data we collect and use is obtained lawfully and ethically. By sourcing information solely from public and verifiable corporate disclosures and websites, we mitigate the risk of using data that could be associated with a breach of fiduciary duty, contract, or deceptive behavior. We are confident that the Data we provide does not contain any information derived from such activities.

3.2 PERSONAL DATA / PII		
3.2.1	<p>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?</p> <p>If Yes, please also answer the questions in Appendix 1</p>	<p><input type="checkbox"/> Yes, and more details are provided below</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
3.2.2	<p>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?</p>	<p>The Data we produce is 100% company-focused and does not include any information about individuals. Our sourcing is strictly limited to publicly available corporate disclosures, websites, and other legal documentation directly related to businesses. This approach ensures that no Covered Personal Information is collected, as our process is entirely centered on data pertaining to companies rather than individuals.</p>
3.3 OTHER ISSUES		
3.3.1	<p>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)?</p> <p>If yes, please fill out Appendix 2, which refers to these practices as “scraping.”</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
3.3.2	<p>Does the Company collect any Data through the use of Application Programming Interface (“API”) calls or similar techniques?</p> <p>If yes, please fill out Appendix 2, which refers to these practices as “scraping.”</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
3.3.3	<p>Does the Company collect Data from mobile devices, such as phones or tablets or collect data about individuals’ digital device usage?</p> <p>If yes, please fill out Appendix 3.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

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 the name of the Company's outside counsel, if any, relating to the Data and/or the Company's data practices more generally.	1. WALTEMATHE ANWALTSKANZLEI 2. Domenig & Partner

4.1.3	<p>Please provide a description of how the legal and compliance aspects of the collection and dissemination of data are managed by the Company.</p>	<p>The Company has carefully designed its data collection methodology to ensure it does not infringe on the intellectual property rights of third parties or violate the terms of use of the companies from which data is sourced. The raw data is exclusively collected from public and legally accessible sources, such as corporate websites, regulatory filings, and official corporate disclosures, and the Company does not accept raw data from third parties who may hold intellectual property rights over the data. When automated methods are used, strict compliance is maintained with the robots.txt files and the terms and conditions of the websites. For websites that prohibit the use of bots, crawling engines, or automated tools, the Company employs a dedicated team of web researchers who manually investigate and extract the data to ensure full compliance with the site's policies and legal requirements. This meticulous approach ensures that all data collection is conducted ethically, transparently, and in full accordance with applicable laws.</p>
4.1.4	<p>Does the Company maintain written policies and procedures regarding the handling sensitive information, including:</p> <ul style="list-style-type: none"> • MNPI • Covered Personal Information • Confidential information • Data supplier due diligence, if applicable? 	<p><input type="checkbox"/> Yes, a description of the policies is provided below</p> <p><input checked="" type="checkbox"/> No</p> <p>Please input a description of the policies maintained by the company.</p>

4.2 GENERAL DATA COLLECTION AND DATA DISSEMINATION		
4.2.1	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)?	The Company ensures compliance with the terms of use of any data source by carefully reviewing and adhering to the specific terms and conditions outlined by each source. For websites, this includes respecting robots.txt files and any explicit restrictions on automated data collection, such as crawling or scraping. When such methods are prohibited, the Company relies on its team of skilled web researchers to manually collect publicly available data in a manner consistent with the site's policies. For third-party suppliers, the Company conducts due diligence to verify that the data is provided lawfully and aligns with the agreed contractual terms. This rigorous approach guarantees that all data is obtained ethically and in full compliance with the terms of use set by the source.
4.2.2	<p>Relating to its data collection/use/distribution practices, in the last 5 years, has the Company ever?</p> <p>Please provide additional details, if necessary</p>	<p><input type="checkbox"/> Received a cease and desist order</p> <p><input type="checkbox"/> Been sued/notified of alleged claim</p> <p><input type="checkbox"/> Received a subpoena</p> <p><input type="checkbox"/> Been subject to an investigation by a regulator, law enforcement agency, or governmental organization</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> None of the above</p> <p>Please click or tap here to provide additional details, if necessary.</p>

4.2.3	<p>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?</p>	<p> <input type="checkbox"/> Received a cease and desist order <input type="checkbox"/> Been sued/notified of alleged claim <input type="checkbox"/> Received a subpoena <input type="checkbox"/> Been subject to an investigation by a regulator, law enforcement agency, or governmental organization <input type="checkbox"/> Other <input checked="" type="checkbox"/> None of the above </p> <p>Please click or tap here to provide additional details, if necessary.</p>
-------	---	---

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 COVERED PERSONAL INFORMATION		
1.1	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)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
1.2	Do natural persons provide consent to the commercialization of their Covered Personal Information?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
1.3	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.
1.4	Does the Company or any third party sources used to produce the Data employ any de-identification or anonymization processes?	<input type="checkbox"/> Yes, and more details are provided below <input type="checkbox"/> No <input type="checkbox"/> Not applicable Click or tap here to enter text.
1.5	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.

2 WEB SCRAPING AND APIS

2.1	<p>Do you use any service providers to assist you in web data collection including proxies, CAPTCHA solutions, third-party scraping providers, or others?</p> <p><u>IF SO, YOUR ANSWERS BELOW INCLUDE BOTH YOUR PRACTICES AS WELL AS THOSE OF THE ABOVE-REFERENCED SERVICE PROVIDERS</u></p>	<p><input checked="" type="checkbox"/> Proxies</p> <p><input type="checkbox"/> CAPTCHA solutions</p> <p><input type="checkbox"/> Third-party scraping providers</p> <p><input type="checkbox"/> Others</p>
-----	---	--

<p>2.2</p>	<p>Has the Company considered any industry or other web data collection guidelines including</p> <ul style="list-style-type: none"> - The FISD Web Data Collection Guidelines - Investment Data Standards Organization Web Crawling Best Practices - Others? <p>Please describe how you implement and/or comply with that guidance.</p>	<p>The Company has carefully considered industry guidelines for responsible web data collection, including the FISD Web Data Collection Guidelines and the Technical and Governance Guidelines for Responsible Data Collection from the Alliance for Responsible Data Collection (ARDC). In line with these standards, we have implemented several measures to ensure compliance and responsible practices in our data collection efforts:</p> <p>We strictly limit our data collection to publicly accessible internet data, ensuring that we do not access or collect information requiring a restricted access login. To minimize potential disruptions, we schedule automated data collection during low-traffic periods based on inferred geographic and content-based traffic patterns. Additionally, we apply randomness to script start times to avoid generating concurrent requests and keep the number of outstanding requests below predefined limits. Scripts are further calibrated to operate at a "human speed," mimicking the pace at which a person would manually collect data.</p> <p>The Company adheres to robots.txt directives, including crawl-delay instructions, when specified. Furthermore, all data collection activities comply with acceptable use policies, which reflect our commitment to relevant laws and outline prohibited activities or those requiring additional internal review.</p> <p>In compliance with the FISD Web Data Collection Considerations, we ensure that the data we collect either constitutes "facts" or falls under fair use, as clarified in legal precedents such as Swatch Group v. Bloomberg. Additionally, we do not collect data on "Operating Companies," as defined by the FISD, ensuring that our activities are not competitive with the entities managing the websites we access.</p> <p>By implementing these practices, we align with industry standards for ethical and responsible web data collection while maintaining transparency and legal compliance.</p>
------------	--	--

2.3	Does the Company perform any analysis of the terms and conditions of the websites that it scrapes? If so, please describe that analysis.	<input checked="" type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No <p>Yes, the Company conducts a thorough analysis of the terms and conditions of every website it scrapes. This process ensures that our data collection activities comply with the website's stated policies. If the terms and conditions explicitly prohibit the use of automated methods, we respect these restrictions and instead assign a human operator to manually investigate and extract the publicly available data. This approach allows us to maintain compliance with the website's terms while continuing to gather data in an ethical and lawful manner.</p>
2.4	Does the Company scrape data from directories or files specified as disallowed in robots.txt?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.5	Does the Company utilize proxies, including anonymizing proxies? If so, do the proxy providers include information sufficient for scraped websites to contact the Company?	<input checked="" type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No <p>Yes, the Company utilizes proxies, including anonymizing proxies. This approach helps maintain operational efficiency and minimizes the risk of overloading servers. However, this anonymization is not intended to obscure the Company's identity. The proxy providers include contact details in its terms of service for addressing general inquiries</p>
2.6	Does the Company use multiple IP addresses or otherwise anonymize its IP addresses?	<input checked="" type="checkbox"/> Yes, and details are provided below <input type="checkbox"/> No <p>The Company uses anonymized IP addresses as part of its data collection process. This approach helps maintain operational efficiency and minimizes the risk of overloading servers.</p>
2.7	Does the Company use onion routing in connection with its scraping activities?	<input type="checkbox"/> Yes, and details are provided below <input checked="" type="checkbox"/> No <p>Click or tap here to provide additional details.</p>
2.8	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 checked="" type="checkbox"/> No <p>No, the Company does not collect data from websites through automated means.</p>

2.9	Are the websites from which the Company scrapes able to identify and contact the Company?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No The ability of websites to identify and contact the Company may vary.
-----	---	--

<h3 style="margin: 0;">3 DIGITAL DEVICE/MOBILE DATA</h3>		
3.1	Does the Company monitor, or is the Data or underlying data obtained by monitoring, 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.
3.2	Does the Company process, or is the Data or underlying data obtained by processing, 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.
3.3	<p>Does the Company process, or is the Data or underlying data obtained by processing, 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.