

# Information Policies

[www.cmegroup.com/informationpolicies](http://www.cmegroup.com/informationpolicies)

Updated April 1, 2019

- 1) Unit of Count
  - a. The default Unit of Count is Device.
  - b. Information accessed from a single source, via multiple delivery mechanisms, must be reported and appropriate Fees will be assessed for each Device.
  - c. Data control systems that can permit simultaneous access to Information, must report the maximum concurrent methods of access on a monthly basis.
  - d. For the purpose of clarity, CME does not accept 'actual use' of Information as a basis for Unit of Count reporting.
- 2) Internal Controls
  - a. must meet the following requirements:
    - i. Account for all Units of Count that have been technically enabled to access or receive Information;
    - ii. Provide accurate historical audit trail information;
    - iii. Generate audit trail reports, showing software controlled entitlements (not administrative reports), including activations and deactivations;
    - iv. Govern Device access with unique ID and password combinations that are not shared;
    - v. Prevent, or identify and count, simultaneous access to Information, by the same unique ID and password combination; and
    - vi. Are used to govern Licensee and Subscriber use of Information.
  - b. If the Information is disseminated into a network which does not control access to the Information, then all Unit of Count Devices with access to that network must be reported as Fee liable for all Information.
- 3) End of Day – End of Day Information is disseminated by CME at 10.30pm CT via MDP.
- 4) Fee Waivers  
Licensees are eligible to apply for Fee Waivers for Internal Display Devices used exclusively for:
  - Internal Technical Support – provision of technical assistance relating only to data quality or performance issues by Licensee's internal technical support staff in situations related only to Information and Services supplied to the Licensee's employees but not using Information directly in placing or adjusting an order.
  - Quality Assurance – oversight of internal data quality control and assurance – i.e. monitoring systems to ensure correct software or hardware processing of the Information to ensure accurate flow of data but not using Information directly in placing or adjusting an order.
  - Product Development – developing new Licensee Services or further developing existing Licensee Services.

Licensees who are Information distributors licensed for redistribution of Real Time Information are also eligible to apply for Fee Waivers for Internal Display Devices used exclusively for:

- Product Demonstration and Client Training – demonstrating the Licensee's Service to potential Subscribers or training Subscribers in the use of the Licensee's Service.
- Customer Services Technical Support - providing customers of the Licensee's Service with technical support relating only to data quality or performance issues but not for the purpose of providing instrument price quotations, settlement data or any other CME Information.
- Marketing Events – demonstrating Licensee's Service in a public forum – i.e. at a conference/trade show or other public and time-limited event.

The maximum number of Devices that are eligible for the Fee waiver will not exceed 10% of the total Devices entitled for Real Time Information.

Licensee must report all Devices to CME to be eligible for this Fee waiver. Any Devices that are not reported by Licensee will be charged Real Time Device Fees.