

40. Attach as Exhibit AA a description of safeguards, policies, and procedures implemented by the applicant to prevent the misappropriation or misuse of (a) any confidential information received by the applicant, including, but not limited to, trade data, position data, and any nonpublic personal information about a market participant or any of its customers; (b) material, nonpublic information; and/or (c) intellectual property by applicant or any person associated with the applicant for their personal benefit or benefit of the others.

DDR has implemented several safeguards, policies and procedures to prevent the misappropriation or misuse of confidential information, including, among other things, material nonpublic information and intellectual property. The DDR Code of Conduct (attached at Exhibit J(2)) requires all personnel supporting DDR operations to hold confidential information, including trade data, trading strategies and other intellectual property of clients, in the strictest confidence and to take all reasonable precautions to prevent the inadvertent disclosure of such information. This policy also prohibits the use of confidential information, including material nonpublic information, for the individual's own benefit or the benefit of others and restricts an individual's use of confidential information to that which is required to perform the individual's assigned duties, as authorized by the appropriate DDR officer, or required by law. The DTCC enterprise-wide employee trade monitoring safeguard described in the DDR Code of Conduct, monitors the investment and trading activity of all personnel supporting DDR operations to ensure compliance with applicable restrictions on the use of confidential information. In connection with this, all brokerage accounts that the applicable individual controls, that members of the applicable individual's household control, or that the applicable individual shares control with must be disclosed to DDR. Further, DDR must be authorized to request information about the activity in any such account directly from the applicable financial institution. Restrictions placed on affiliated and non-affiliated third parties from accessing confidential information to protect against misuse or misappropriation are described in the DDR Compliance Manual (Exhibit GG(2)). The DTCC Global Privacy Policy (attached at Exhibit Z(1)) defines baseline obligations in line with applicable global legal and regulatory requirements for the protection of personal data).