



## **Jordan & Jordan Market Data Services**

### **Representative Engagements**

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## Data Usage Audits

### Client Type: Global Investment Bank

#### Exchange Audit Preparation and Response

Assisted client with the management of an audit performed by a major European exchange.

- › Reviewed client market data desktop usage and reporting
- › Reviewed client applications sourcing exchange data
- › Created client analysis of the audit period
- › Reviewed exchange agreements covering the audit period
- › Reviewed official exchange audit report
- › Developed client's response to exchange audit findings
  - › Clarified client position on unit of count
  - › Provided details on applications in question
  - › Calculated client financial reporting position for the audit period
- › Assisted client in face-to-face meetings with exchange personnel and auditors

#### MISU Audit Services

Reviewed Multiple Instance Single User (MISU) reporting process for compliance with New York Stock Exchange policy.

- › Confirmed that MISU reports included all users in the firm's inventory system
- › Confirmed that the firm's inventory system accurately reflected permissioning
- › Confirmed that MISU reports were presented in the required New York Stock Exchange format
- › Confirmed that records were retained in compliance with exchange policy

- › Verified employment status of reported users with the human resource department

## **Per Query Audit Services**

Reviewed quote metering systems for compliance with New York Stock Exchange's query distribution policy.

- › Confirmed that the quote metering system records all quote requests
- › Confirmed that the quote metering system produces accurate usage reports for the exchange
- › Confirmed that the market hours and holidays recognized by the quote metering system are the actual real-time hours and holidays of the exchange
- › Confirmed that capping is performed in compliance with exchange policy

## **Client Type: Major North American Exchange**

### **Exchange Audit Services**

Reviewed reporting and distribution practices of market data vendors and end-user firms for compliance with exchange policy.

- › Confirmed monthly usage reports to permissioning records
- › Confirmed that vendors collected usage reports from data feed customers
- › Investigated the proprietary applications of end user firms
- › Confirmed that subscriber agreements are executed with all external customers

## **Strategic Consulting Engagements**

### **Client Type: Global Investment Bank**

#### **Market Data Spend Analysis**

Analyzed the market data usage and spending to identify potential cost reduction opportunities.

- › Reviewed market data vendor contractual obligations, including termination and renewal dates, usage requirements, early termination penalties, etc.
- › Identified current usage and requirements, including under- or non-utilized products and non-essential market data permissioning
- › Provided comparable vendor product comparisons for required data products where available
- › Analyzed vendor product usage to identify potential savings through contractual negotiation where alternative products were not available
- › Reviewed the market data inventory and reporting process to identify opportunities for optimization
- › Developed total annual savings potential based on viable market data alternative products, permission reduction, contractual negotiation and process optimization

## **Market Data Special Project Management**

Analyzed market data spend to realign management of certain categories of market data services, leveraging existing market data management software and administration personnel, and setting up procedures for efficient and ongoing maintenance.

- › Performed a comprehensive review of market data services for market data inventory update
- › Acted as a liaison between client and vendors to ensure appropriate routing of invoices
- › Helped design and implement ongoing procurement procedures to ensure ongoing inventory maintenance
- › Updated and communicated changes and additions to ordering system to market data administration team

## **Client Type: Derived Data Products Creator**

### **Client Compliance with Exchange Policies Concerning Creation and Distribution of Derived Data Products**

Leveraged exchange contacts/relationships and our experience with exchange protocol and policies to verify and document the policies concerning requirements and fees applicable to the creation of derived data products, including securing, completing, and submitting appropriate documents needed for complete compliance with exchange rules.

- › Ensured compliance with diverse market data policies governing the creation of derived data products for over 70 exchanges
- › Contacted exchanges, determined appropriate requirements for index development, and documented policies for referral and future use
- › Completed and submitted numerous diverse agreements and system descriptions required by the exchanges for such application of data

## Compliance Assessment Engagements

### Client Type: Global Investment Bank

- › Validated an annual multi-million dollar under-reporting liability in applications used in Europe, the Americas and the Pacific Rim
- › Developed and implemented global application reporting processes to correct systematic underreporting
- › Provided strategic and policy guidance for remediation of applications not complying with exchange contractual and policy requirements
- › Developed and implemented process controls to eliminate the possibility for recurrence of systematic under-reporting
- › Assisted in developing a pro-active strategy to approach exchanges for liability settlements
- › Assisted in preparing for exchange audits, including presenting client's compliance, control and reporting processes to exchange auditors

### Client Type: Global Investment Bank

- › Analyzed market data usage of over 200 applications in Europe, the Americas and the Pacific Rim
- › Identified under-reporting for 40 applications costing millions of dollars; recommended remediation activities reduced on-going liability by over 20%
- › Identified application users with access to unnecessary exchange market data. The termination of such access capability resulted in a further significant reduction in annual liability
- › Identified and quantified the annual financial liability associated with incomplete reporting of users permissioned through DACS

- › Identified application deployment and market data permissioning processes that increased compliance exposure and drafted appropriate workflows to ensure market data compliance
- › Integrated Jordan & Jordan's repository of exchanges' market data policies into its workflow
- › Assisted in developing a pro-active liability settlement strategy to approach exchanges, including development of an exchange-by-exchange risk rating analysis, identification of key exchange personnel and expected negotiation levers

## **Client Type: Global Investment Bank**

- › Performed financial analysis of usage of proprietary vendor data products used by vendor desktop software users and applications fed through the vendor data feed for assessment of overall value
- › Analyzed exchange market data usage by 45 applications in North America and identified under-reporting liability amounting to millions of dollars
- › Managed remediation activities of applications responsible for under-reporting
- › Developed an application reporting process and application market data approval workflow to improve compliance
- › Assisted in developing strategies for pro-active settlement of liability

## **Client Type: Top 100 Hedge Fund**

- › Assisted in achieving compliance with major North American securities exchanges' policies
- › Obtained exchange approval for a non-traditional market data entitlement/reporting procedure that resulted in significantly lower market data costs

## **Client Type: Top 100 Hedge Fund**

- › Reviewed its market data infrastructure and recommended options to correct and maintain identified exchange market data compliance issues
- › Developed a response/justification to an adverse audit finding from a major exchange that resulted in a significant reduction in the initial audit assessment

# Outsourcing Services

## Client Type: Global Investment Bank

### Staff Augmentation: Market Data Manager

Supplied managerial presence to market data administration team while company supervisor was on extended leave, providing guidance and leadership while managing ongoing challenges and changes inherent in the market data administrative world.

- › Acted as interim manager for the Americas Market Data Administration team, supervising daily inventory maintenance and permissioning procurement
- › Managed multiple inventory changes as a result of exchange consolidations and policy changes
- › Assisted in the development and documentation of a global procurement and control process for access to market data through a major global vendor
- › Analyzed and resolved numerous invoice issues, working with vendors and businesses to come up with quick and appropriate responses